



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**Charter One Bank N.A.
Charter Number: 24340**

**1215 Superior Avenue
Cleveland, Ohio 44114**

Office of the Comptroller of the Currency

**Large Bank Division
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Washington DC 20019**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**Satisfactory**”.

The following table indicates the performance level of **Charter One Bank N.A.** with respect to the lending, investment, and service tests:

Performance Levels	Charter One Bank N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- A good volume of HMDA lending and good responsiveness to the credit needs of the assessment areas.
- A good distribution of loans to borrowers and to geographies of different income levels.
- A substantial majority of loans were made in the institution’s assessment areas.
- A good volume of community development lending which has a positive impact on the lending test performance.
- A good level of community development investments, which show good responsiveness to the credit and economic development needs of the assessment areas. The majority of the investments were made late in the evaluation period and the timing of the investments had a negative impact on the investment test performance.
- Branch locations are reasonably accessible to low- and moderate-income individuals and geographies. The bank’s branch openings in low- and moderate-income tracts had a positive impact on the overall service test performance.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for pre-approval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division (MD): As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an

employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

Charter One Bank N.A. (COB) is an interstate financial institution headquartered in Cleveland, Ohio. During the evaluation period, COB conducted business within thirty-six assessment areas (AAs) located in nine states. COB is a wholly owned subsidiary of Charter One Financial Incorporated (COFI) headquartered in Cleveland, Ohio. COB comprised over 99 percent of the assets of COFI as of June 30, 2004. COB was the 30th largest commercial bank based upon assets as of December 31, 2003. COB converted to a national bank charter from a federal thrift charter on May 7, 2002.

COB experienced significant growth through merger and acquisition activity and aggressive de novo branch openings. During the evaluation period, COB acquired Advance Bancorp, Inc. in Chicago, Illinois in 2003 and Charter National Bancorp, Inc. in Michigan in 2002. These two holding companies had combined assets of \$.9 billion. COB opened 209 de novo branches during the evaluation period. These de novo branches added one new rating area (Indiana) that was in existence for more than twelve months and is evaluated in this performance evaluation. Two additional new rating areas, Pennsylvania and Connecticut, did not have twelve months of lending data and were not included in the scope of this evaluation.

As of June 30, 2004, COB had total assets of \$42.5 billion, deposits of \$26.9 billion, and total loans of \$33 billion. Approximately, 68 percent of the bank's loan portfolio was comprised of real estate loans, of which the predominant portion was secured by 1-4 family residential properties. Loans to individuals for household, family, and personal expenditures made up 21 percent of the total loan portfolio and commercial and industrial loans comprised 4 percent of the portfolio. COB had a Tier 1 capital base of \$2.6 billion as of June 30, 2004.

At the request of COB and in accordance with the CRA, this evaluation does not consider affiliate activities.

As of August 31, 2004, COB was a full service bank with 667 branches in nine states. The bank offers a full array of retail banking services and loan products. Although the bank's business strategy is not limited to any one business endeavor, its primary focus is retail banking with an emphasis on mortgage and consumer lending. Competition is strong in the bank's major markets with numerous local, regional, and national banks as well as mortgage companies and non-bank lenders.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its assessment areas.

COB was rated "Satisfactory" at the previous CRA evaluation dated May 14, 2001 and covered activity through March 31, 2001. The Office of Thrift Supervision performed this examination.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The last evaluation of the bank was dated May 14, 2001. The current evaluation assesses the bank's performance from January 1, 2002 through August 31, 2004. Under the lending test we considered home purchase, refinance and small business lending data from January 1, 2002 through June 30, 2004. We did not evaluate home improvement lending data since it was only reported for the first six months of 2004. Prior to 2004 the bank was not required to report home improvement HMDA data based upon HMDA reporting definitions. For the Investment and Service tests and for Community Development Loans, we considered activity from January 1, 2002 through August 31, 2004.

For HMDA and CRA reportable loans, we used three sub-evaluation periods. We analyzed loan data from January 1, 2002 through December 31, 2002 using the 1990 census demographic data. We analyzed loan data from January 1, 2003 through December 31, 2003 using the 2000 census demographic data. We analyzed loan data from January 1, 2004 through June 30, 2004 using the 2000 census demographic data with official geographic adjustments to reflect changes to the MSA boundary definitions made by the Office of Management and Budget (OMB). While the performance evaluation covers performance for all three periods described above, the standard tables are shown only for the 2003 period.

Data Integrity

COB's HMDA data was accurate when submitted. However, the bank's 2002 small business lending information was not accurate when reported. Management reviewed and corrected the 2002 data to ensure accuracy and reliability. We used the revised data in our examination. The data correction focused on the removal of non-reportable loans to not-for profit entities. The 2003 and 2004 small business lending data was accurate. We reviewed and validated the accuracy of the HMDA and small business lending data, including the scrubbed 2002 small business lending data.

CD loans, investments, and services submitted by COB were verified to ensure they qualified under the regulatory definition for community development.

Selection of Areas for Full-Scope Review

For the purposes of this evaluation, seven individual state ratings are blended into COB's overall evaluation. In each state, one AA was selected for a full-scope review. These full-scope areas were selected based upon their percentage of deposits and lending volume.

We did not evaluate COB's performance in the States of Pennsylvania and Connecticut or in the Columbus, Ohio MSA. The bank operated in these states and this AA for less than one year as of June 30, 2004 and did not have at least 12 months of lending data to analyze.

Ratings

The bank's overall rating is a blend of state ratings. Ohio, New York, Illinois and Michigan have similar levels of deposits. The combined deposits in these four states represent 95

percent of total deposits and these state rating areas were most heavily weighted in arriving at the evaluation conclusions.

Overall ratings are a blend of 2002, 2003 and 2004 performance. Performance in 2003 was weighted most heavily since it is the most current full year of data. For the State of Indiana, 2004 was weighted more heavily, as both 2003 and 2004 were partial years of data for the state due to de novo branching activities and 2004 data was the most current. HMDA loans represent 95 percent of lending by COB and receive more weight in assigning ratings. The bank did not originate any small loans to farms during the evaluation period. The volume of multifamily lending was minimal and analysis of this product was not meaningful to the overall rating.

The state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

We considered the timing of the bank's community development investments in our evaluation of Investment Test performance. The fact that the majority of the investments were made in 2004 rather than over the entire evaluation period was a factor in our conclusions.

Inside/Outside Ratio

This ratio is a bank wide calculation, and is not calculated by individual rating area or AA. Analysis is limited to bank originations. In 2002, 93.0 percent of HMDA loans were originated inside the bank's AAs and 97.4 percent of small loans to businesses were originated within the bank's AAs. In 2003, 92.0 percent of HMDA loans were originated inside the bank's AAs and 97.3 percent of small loans to businesses were originated within the bank's AAs. Performance at these levels is very positive.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

State Rating

State of Ohio

CRA Rating for Ohio:	Satisfactory
The lending test is rated:	Outstanding
The investment test is rated:	Low Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- An excellent volume of HMDA lending and a good responsiveness to the credit needs of the AAs.
- A good distribution of loans among borrowers of different income levels.
- A good distribution of loans among geographies of different income levels.
- An excellent level of community development lending that was responsive to the credit needs of the AAs and had a positive impact on lending test performance.
- An adequate level of investments that reflected good responsiveness to the credit and community development needs of the AAs.
- Service delivery systems were accessible to geographies and individuals of different income levels in these AAs. The bank's performance in opening branches in low- and moderate-income geographies improved accessibility and was a positive factor in service test performance.

Description of Institution's Operations in Ohio

COB had six AAs within the State of Ohio. They included the Cleveland AA, the Akron AA, the Canton AA, the Toledo AA, and Youngstown AA and the AA of the combined non-metropolitan areas. COB had 157 branches within the state, representing 23.5 percent of the bank's total branch network. Forty-eight new branches were opened in Ohio during the evaluation period.

As of June 30, 2003, the bank ranked 8th in total state deposits with a 3.55 percent market share. COB's statewide deposits totaled \$7.5 billion. Deposit competitors include Fifth Third, National City, KeyBank, Bank One, and U.S. Bank.

Based on deposits, Ohio was the second largest state rating area and accounted for approximately 26.9 percent of total bank deposits. During the evaluation period, COB originated 26 percent of its total reportable HMDA loans and small loans to businesses in Ohio.

Refer to the Market Profiles for the State of Ohio in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in Ohio

We conducted a full-scope review of the Cleveland AA. This AA had 64 percent of the state's deposits and accounted for approximately 47 percent of HMDA lending and 58 percent of small loans to businesses in the state during the evaluation period. As of June 30, 2004, the Cleveland AA had 57 percent of the state's branches. We based ratings for the State of Ohio primarily on the results of our analysis of the AA selected for full-scope review due to the majority of deposits and loans located in this AA.

We conducted limited-scope reviews of the Akron AA, Canton AA, Toledo AA, Youngstown AA and the combined non-metropolitan AA.

We considered input received from community contacts. The two organizations contacted were involved primarily with affordable housing initiatives. They stated a primary need in the Cleveland AA was affordable housing programs including affordable mortgage loans and financial literacy. We considered these needs in our evaluation of COB's performance in the State of Ohio.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Ohio is rated Outstanding. Based on a full-scope review, the bank's performance in the Cleveland AA is excellent.

Lending Activity

Refer to Table 1, Lending Volume in the State of Ohio section of Appendix D for the facts and data used to evaluate the bank's lending activity.

COB's overall lending activity in the full-scope AA is excellent. COB ranked third for deposits with a 7.4 percent market share. Based upon 2003 aggregate HMDA data, COB ranked fourth in home purchase lending (4.01 percent market share) and second in refinance lending (7.02 percent market share) in the Cleveland AA. The bank ranked 20th in small business lending; however, since small business lending was not a primary focal point for the bank it did not significantly impact the overall lending volume conclusion.

Distribution of Loans by Income Level of the Geography

The geographic distribution of home mortgage loans and small loans to businesses reflects good penetration throughout the full-scope AA geographies.

The reader should note that in developing the conclusions for both geographic and borrower distribution, more consideration was given to 2003 data. The 2002 data is older and the more recent data better reflects steps taken by management to meet the credit needs of their AAs. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Home Mortgage Loans

Refer to Tables 2, 4 and 5 in the State of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home purchase loans was good. The geographic distribution of home purchase loans was adequate in 2002, good in 2003, and excellent in 2004.

In 2002, the portion of home purchase loans made in low-income geographies was significantly lower than the percentage of owner-occupied housing units and was poor. The portion of home purchase loans made in moderate-income geographies was slightly lower than the percentage of owner-occupied units and was good. The 2002 market share data for low- and moderate-income geographies was consistent with the geographic distribution performance.

In 2003, the portion of home purchase loans in low-income geographies was somewhat lower than the percentage of owner-occupied housing units and was adequate. The portion of home purchase loans made in moderate-income geographies exceeded the percentage of owner-occupied units and was excellent. The 2003 market share data for low- and moderate-income geographies was consistent with the geographic distribution performance.

In 2004, the portion of home purchase loans in low- and moderate-income geographies exceeded the percentage of owner-occupied units and was excellent.

The overall geographic distribution of refinance loans was adequate. The geographic distribution of refinance loans was poor in 2002, adequate in 2003, and good in 2004.

In 2002, the portion of refinance loans made in low-income geographies was significantly lower than the percentage of owner-occupied units and was poor. The portion of refinance loans made in moderate-income geographies was somewhat lower than the percentage of owner-occupied units and was adequate. The low- and moderate-income market share data was consistent with the geographic distribution.

In 2003, the portion of refinance loans made in low- and moderate-income geographies was somewhat lower than the percentage of owner-occupied units and was adequate. The market share of refinance loans in low- and moderate-income geographies was slightly lower than the bank's overall market share and reflected good performance.

In 2004, the portion of refinance loans made in low- and moderate-income geographies was slightly lower than the corresponding percentage of owner-occupied units and reflected good performance.

Multifamily home lending was minimal in the Cleveland AA and was not meaningful to the performance of COB.

Small Loans to Businesses

Refer to Table 6 in the State of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses was good in 2002, 2003, and 2004.

In 2002, the portion of small loans to businesses made in low-income geographies was somewhat lower than the portion of small businesses in those geographies and adequate. Performance in moderate-income geographies was good with the portion of small loans to businesses in those geographies slightly lower than the corresponding portion of small businesses. The market share of small loans to businesses in low- and moderate-income geographies exceeded the bank's overall market share and was excellent.

In 2003, the portion of small loans to businesses made in low-income geographies was somewhat lower than the portion of businesses in those geographies and was adequate. The portion of small loans to businesses in moderate-income geographies was excellent and almost equaled the portion of small businesses in those geographies. In low-income geographies, the market share for small loans to businesses was slightly lower than the overall market share of loans to small businesses and was good. In moderate-income geographies, the market share of small loans to businesses exceeded the bank's overall market share and was excellent.

In 2004, the portion of small loans to businesses made in low- and moderate-income geographies was slightly lower than the portion of small businesses in those geographies and reflected good performance.

Lending Gap Analysis

We evaluated the lending distribution in the Cleveland AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

This ratio is a bank wide calculation, and is not calculated by individual rating area or AA. Analysis is limited to bank originations. In 2002, 93.0 percent of HMDA loans were originated inside the bank's AAs and 97.4 percent of small loans to businesses were originated within the bank's AAs. In 2003, 92.0 percent of HMDA loans were originated inside the bank's AAs and 97.3 percent of small loans to businesses were originated within the bank's AAs. Performance at these levels is very positive.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans was good among borrowers of different income levels. The distribution of loans among borrowers of different income levels in the Cleveland AA was good.

Home Mortgage Loans

Refer to Tables 8 and 10 in the State of Ohio section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution for home purchase lending was excellent. Borrower distribution was excellent in 2002, 2003, and 2004.

In 2002 and 2003, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered excellent after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families and was excellent. The market share of home purchase loans to low-income borrowers exceeded the bank's overall market share and was excellent. The market share of home purchase loans to moderate-income borrowers was slightly lower than the bank's overall market share and was good.

In 2004, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered excellent after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families within the AA and was excellent. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Borrower distribution for refinance lending was good. Borrower distribution was good in 2002, 2003, and 2004.

In 2002, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families. After analyzing the portion of households below the poverty level in the AA, the distribution was considered adequate. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families and was excellent. The market share of low-income borrowers was somewhat lower than the bank's overall market share and reflected adequate performance. The market share of moderate-income borrowers for refinance loans was slightly lower than the bank's overall market share and reflected good performance.

In 2003, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of households living below the poverty level. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was excellent. The market share of low-income borrowers exceeded the bank's overall market share and was excellent. The market share of moderate-income borrowers was slightly lower than the bank's overall market share and reflected good performance.

In 2004, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of household living below the poverty level. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families and reflected excellent performance. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Small Loans to Businesses

Refer to Table 11 in the State of Ohio section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the Cleveland AA was good. Distribution was good in 2002, excellent in 2003, and adequate in 2004.

In 2002, the percentage of small loans to businesses was slightly lower than the percentage of small businesses and was good. The bank's market share of small loans to businesses significantly exceeded its overall market share and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2003, the percentage of small loans to businesses significantly exceeded the percentage of small businesses and was excellent. The bank's market share of small loans to businesses exceeded its overall market share and reflected excellent performance. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2004, the percentage of small loans to businesses was somewhat lower than the percentage of small businesses and was adequate. The bank made slightly less than half of its small loans to businesses in amounts below \$100,000. As the evaluation period did not cover the full year, we did not evaluate market share performance in 2004.

Community Development Lending

Refer to Table 1, Lending Volume in the State of Ohio section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

COB's excellent volume of CD lending had a positive impact on the evaluation of its lending performance in the Cleveland AA. COB originated \$22.1 million in qualified CD loans in the AA during the evaluation period. Approximately, \$20.6 million of the CD loans supported affordable housing for low- and moderate-income individuals and showed good responsiveness to an important need in the AA.

Product Innovation and Flexibility

COB offered a standard product mix of loans including FHA loans and FNMA affordable housing loans. COB originated 116 loans under FNMA affordable housing programs during the evaluation period. COB also offered four affordable lending products through its Central Cities Homeownership Assistance Program (CCHAP). CCHAP products have flexible underwriting standards designed to assist low- and moderate-income people with home purchases. COB originated 732 CCHAP loans during the evaluation period in the Cleveland AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Toledo AA is not inconsistent with the bank's overall Outstanding performance under the lending test in Ohio. In the Akron AA, the Canton AA and combined non-metropolitan AA, the bank's performance is weaker than the bank's overall performance in Ohio due to weaker community development lending activity. In the Youngstown AA, the bank's performance is weaker than the bank's overall performance in Ohio due to weaker geographic distribution of HMDA lending. The bank's performance in the limited scope AAs did not have a significant impact on the overall lending test rating. Refer to Tables 1 through 11 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Ohio is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Cleveland AA was adequate.

Refer to Table 14 in the State of Ohio section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, COB made six investments totaling \$7.6 million in the Cleveland AA. There were two prior period investments still outstanding totaling \$387 thousand in the Cleveland AA. In addition, there were three current period investments totaling \$503 thousand and one prior period investment totaling \$1.9 million in the larger statewide or regional area, which benefited the AA. COB also made 117 grants totaling \$675 thousand in the full scope AA. A substantial majority of the investments and grants were made during the evaluation period. COB exhibited a low level of complexity and was not innovative in its qualified investments. Almost 95 percent of the CD investments were associated with affordable housing for low- and moderate-income people, which is responsive to an important need within the AA. The Cleveland AA had a reasonable number of investment opportunities based upon discussions with bank management and community contacts. The Cleveland AA is competitive as there were other large regionally and nationally active banks competing for qualified investments in this market.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Youngstown AA and the combined non-metropolitan AA is not inconsistent with the bank's overall Low Satisfactory performance under the investment test in Ohio. In the Akron AA and Toledo AA, the bank's performance is stronger than the bank's overall performance in the state due to a higher volume of qualified investments. In the Canton AA, the bank's performance is weaker than the bank's overall performance in the state due to a lower volume of qualified investments. The bank's performance in the limited scope AAs did not have a significant impact on the investment test rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Ohio is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Cleveland AA is good.

Retail Banking Services

Refer to Table 15 in the State of Ohio section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

COB's delivery systems are reasonably accessible to individuals and geographies of different income levels in the Cleveland AA. Access to branches in low- and moderate-income areas was adequate.

The bank opened one branch in a low-income area and five branches in moderate-income areas over the course of the evaluation period. No branches were closed during the evaluation period. These branch openings improved accessibility in low- and moderate-income geographies and had a positive impact on the service test rating.

COB's hours and services offered throughout the full-scope AA were good. The services offered and hours of operation of the branches were consistent across the branch network.

COB offered a variety of alternative delivery systems, which included full service automated teller machines (ATMs) and telephone banking including loan-by-phone services. On-line banking services included deposit applications, retail loan applications, home equity and mortgage loan applications, small business and commercial loan applications and bill payment services. We did not place significant weight on alternative delivery systems, as no data was available to determine the impact of these banking services on low- and moderate-income geographies and individuals.

COB offered an affordable checking account product that would be attractive to low- and moderate-income people. The account, which could be opened with as little as a \$50 initial deposit, featured no monthly maintenance fee and no minimum monthly balance.

Community Development Services

COB's performance in providing CD services in its Cleveland AA was adequate and had a neutral impact on the service test performance. While CD services were responsive to local community development needs, the volume of services provided was moderate. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services mostly involved providing credit counseling to low- and moderate-income individuals and technical expertise to non-profit or government organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Akron AA and the combined non-metropolitan AA is not inconsistent with the bank's overall High Satisfactory performance under the service test in Ohio. In the Toledo AA and Youngstown AA, the bank's performance is weaker than the bank's overall performance in the state due to weaker branch distribution. In the Canton AA, the bank's performance is stronger than the bank's overall performance in the state due to excellent branch distribution. The bank's performance in the limited scope AAs did not have a significant impact on the service test rating. Refer to Table 15 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

State Rating

State of New York

CRA Rating for New York:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Low Satisfactory
The service test is rated:	Outstanding

The major factors that support this rating include:

- An excellent volume of HMDA lending and a good responsiveness to the credit needs of the AAs.
- An excellent distribution of loans among borrowers of different income levels.
- A good distribution of loans among geographies of different income levels.
- A good volume of community development lending that was responsive to the credit needs of the AAs and had a positive impact on lending test performance.
- An adequate level of investments that reflects adequate responsiveness to the credit and community development needs of the AAs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the AAs. The bank's performance was positively impacted by branch openings in low- and moderate-income geographies.

Description of Institution's Operations in New York

COB had fourteen AAs within the State of New York during the evaluation period; however, due to de novo branching activity and the OMB change in census boundary definitions, not all fourteen areas were in place for the entire evaluation period. These AAs included the Rochester AA, the Albany AA, the Binghamton AA, the Buffalo AA, the Dutchess County AA, the Elmira AA, the Glen Falls AA, the Jamestown AA, the New York AA, the Newburgh AA, the Syracuse AA, the Utica AA, the Westchester County AA and the AA of the combined non-metropolitan areas. The Elmira, Jamestown and Westchester County AAs were created in 2003 as a result of de novo branch openings. The Dutchess County, Jamestown, and New York AAs were eliminated in 2004 due to the change in OMB MSA boundaries. COB had 189 branches within the state, representing 28.3 percent of the bank's total branch network. Sixty-five new branches were opened during the evaluation period.

As of June 30, 2003, the bank ranked 14th in total state deposits with a 1.33 percent market share. COB's statewide deposits totaled \$7.75 billion. Deposit competitors included Citibank, BankNorth, M&T Bank, and KeyBank.

Based on deposits, New York was the largest state rating area and accounted for 27.8 percent of total bank deposits. During the evaluation period, COB originated 26 percent of its total HMDA loans and small loans to businesses in New York.

Refer to the Market Profiles for the State of New York in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in New York

We conducted a full-scope review of the Rochester AA. This AA had 23.5 percent of the state's deposits and accounted for approximately 24 percent of the HMDA lending and 21 percent of the small loans to businesses in the state. The Rochester AA had 18 percent of the state's branches. We based our ratings for the State of New York primarily on the results of our analysis of the AA selected for full-scope review due to the volume of deposits and loans located in this AA. The limited scope AAs of Albany and Buffalo were given more weight than the other limited scope AAs due to their deposit and lending volumes. Refer to the market profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA.

We conducted limited scope reviews of the Albany AA, Binghampton AA, Buffalo AA, Dutchess County AA, Elmira AA, Glen Falls AA, Jamestown AA, New York AA, Newburgh AA, Syracuse AA, Utica AA, Westchester County AA, and the combined non-metropolitan AA.

We considered input received from community contacts. The organization contacted was involved primarily with affordable housing initiatives and the impact of predatory lending on the community. They stated the primary needs in the Rochester AA were affordable housing programs including affordable mortgage loans, financial literacy training, and more competitive deposit products and branch locations. We considered these needs in our evaluation of COB's performance in the State of New York.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in New York is rated Outstanding. Based on a full-scope review, the bank's performance in the Rochester AA is excellent.

Lending Activity

Refer to Table 1, Lending Volume in the State of New York section of Appendix D for the facts and data used to evaluate the bank's lending activity.

COB's overall lending activity in the full-scope AA is excellent. COB ranked fifth for deposits with a 7.79 percent market share. Based upon 2003 aggregate HMDA data, COB ranked second in home purchase lending (7.14 percent market share) and second in refinance lending (7.88 percent market share) in the Rochester AA. The bank ranked 20th in small business

lending; however, since small business lending was not a primary focal point for the bank, it did not significantly affect the overall lending volume conclusion.

Distribution of Loans by Income Level of the Geography

The geographic distribution of home mortgage loans and small loans to businesses reflects good penetration through the full-scope AA geographies.

The reader should note that in developing the conclusions for both geographic and borrower distribution, more consideration was given to 2003 data. The 2002 data is older and the more recent data better reflects steps taken by management to meet the credit needs of their AAs. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Home Mortgage Loans

Refer to Tables 2, 4 and 5 in the State of New York section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home purchase loans was excellent. The geographic distribution was adequate in 2002 and excellent in 2003 and 2004 in the Rochester AA.

In 2002, the portion of home purchase loans made in low- and moderate-income geographies was somewhat lower than the percentage of owner-occupied housing units and was adequate. The market share in low-income geographies exceeded the overall market share and reflected excellent performance. The market share in moderate-income geographies was somewhat lower than the overall market share and was adequate.

In 2003, the portion of home purchase loans in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units and was excellent. The market share in low-income geographies exceeded the overall market share and reflected similar excellent performance. The market share in moderate-income geographies was somewhat lower than the overall market share and was adequate.

In 2004, the portion of home purchase loans in low-income geographies was slightly lower than the percentage of owner-occupied units and was good. The portion of home purchase loans in moderate-income geographies significantly exceeded the percentage of owner-occupied units and was excellent.

The overall geographic distribution of refinance loans was good. The geographic distribution of refinance loans was adequate in 2002 and 2003 and excellent in 2004.

In 2002, the portion of refinance loans made in low- and moderate-income geographies was significantly lower than the percentage of owner-occupied units and was poor. The market share in low-income geographies almost equaled the bank's overall market share and was good. The moderate-income market share data is somewhat lower than the overall market share and reflected adequate performance.

In 2003, the portion of refinance loans made in low- and moderate-income geographies was somewhat lower than the percentage of owner-occupied units and was adequate. The market share of refinance loans in low- and moderate-income geographies exceeded the bank's overall market share and reflected excellent performance.

In 2004, the portion of refinance loans made in low- and moderate-income geographies exceeded the corresponding percentage of owner-occupied units and reflected excellent performance.

Multifamily home lending was minimal in the Rochester AA and was not meaningful to the performance of COB.

Small Loans to Businesses

Refer to Table 6 in the State of New York section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses was good in 2002 and 2003 and excellent in 2004.

In 2002, the portion of small loans to businesses made in low-income geographies exceeded the portion of small businesses in those geographies and was excellent. Performance in moderate-income geographies was adequate with the portion of small loans to businesses in those geographies somewhat lower than the corresponding portion of small businesses. The market share of small loans to businesses in low-income geographies exceeded the bank's overall market share and was excellent. The market share of small loans to businesses in moderate-income geographies was somewhat lower than the bank's overall market share and reflected adequate performance.

In 2003, the portion of small loans to businesses made in low-income geographies was somewhat lower than the portion of businesses in those geographies and was adequate. The portion of small loans to businesses in moderate-income geographies was excellent and exceeded the portion of small businesses in those geographies. Market share performance for both low- and moderate-income geographies was excellent and exceeded the bank's overall market share.

In 2004, the portion of small loans to businesses made in low-income geographies exceeded the portion of small businesses in those geographies and was excellent. In moderate-income geographies, the portion of loans was slightly lower than the portion of small businesses in those geographies and was good.

Lending Gap Analysis

We evaluated the lending distribution in the Rochester AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

This ratio is a bank wide calculation, and is not calculated by individual rating area or AA. Analysis is limited to bank originations. In 2002, 93.0 percent of HMDA loans were originated inside the bank's AAs and 97.4 percent of small loans to businesses were originated within the bank's AAs. In 2003, 92.0 percent of HMDA loans were originated inside the bank's AAs and 97.3 percent of small loans to businesses were originated within the bank's AAs. Performance at these levels is very positive.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans was excellent among borrowers of different income levels. The distribution of loans among borrowers of different income levels in the Rochester AA was excellent.

Home Mortgage Loans

Refer to Tables 8 and 10 in the State of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution for home purchase lending was excellent. Borrower distribution was excellent in 2002, 2003, and 2004.

In 2002 and 2003, the portion of home purchase loans to low-income borrowers was less than the percentage of low-income families, but was considered excellent after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families and was excellent. The market share of home purchase loans to low-income borrowers exceeded the bank's overall market share and was excellent. The market share of home purchase loans to moderate-income borrowers was somewhat lower than the bank's overall market share and was adequate.

In 2004, the portion of home purchase loans to low-income borrowers was less than the percentage of low-income families, but was considered excellent after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families within the AA and was excellent. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Borrower distribution for refinance lending was excellent. Borrower distribution was good in 2002 and excellent in 2003 and 2004.

In 2002, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families. After analyzing the portion of households below the poverty level in the AA, the distribution was considered good. The portion of refinance loans to moderate-income borrowers almost equaled the percentage of moderate-income families and was good. The market share of low-income borrowers exceeded the bank's overall market

share and reflected excellent performance. The market share of moderate-income borrowers for refinance loans was somewhat lower than the bank's overall market share and reflected adequate performance.

In 2003, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of households living below the poverty level. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was excellent. The market share of low- and moderate-income borrowers exceeded the bank's overall market share and was excellent.

In 2004, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered excellent after analyzing the percentage of household living below the poverty level. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families and reflected excellent performance. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Small Loans to Businesses

Refer to Table 11 in the State of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the Rochester AA was excellent. Distribution was excellent in 2002 and 2003 and adequate in 2004.

In 2002, the percentage of small loans to businesses exceeded the percentage of small businesses and was excellent. The bank's market share of small loans to businesses significantly exceeded its overall market share and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2003, the percentage of small loans to businesses exceeded the percentage of small businesses and was excellent. The bank's market share of small loans to businesses also exceeded its overall market share and reflected excellent performance. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2004, the percentage of small loans to businesses was somewhat lower than the percentage of small businesses and was adequate. The bank made a majority of its small loans to businesses in amounts below \$100,000. As the evaluation period did not cover the full year, we did not evaluate market share performance.

Community Development Lending

Refer to Table 1, Lending Volume in the State of New York section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

COB's good volume of CD lending had a positive impact on the evaluation of its lending performance in the Rochester AA. COB originated \$7 million in qualified CD loans in the AA during the evaluation period and showed good responsiveness to the credit needs of the Rochester AA. Approximately, \$5.5 million of the CD loans supported revitalization and stabilization in a state designated development zone by renovating a vacant building for use in delivering community services and creating low- and moderate-income jobs, an important need in the AA.

Product Innovation and Flexibility

COB offered a standard product mix of loans including FHA loans and FNMA affordable housing loans. COB originated 21 loans under FNMA affordable housing programs during the evaluation period in the Rochester AA. COB also offered four affordable lending products through its Central Cities Homeownership Assistance Program (CCHAP). CCHAP products have flexible underwriting standards designed to assist low- and moderate-income people with home purchases. COB originated 493 CCHAP loans during the evaluation period in the Rochester AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Albany AA, New York AA, Syracuse AA, and the non-metropolitan AA is not inconsistent with the bank's overall Outstanding performance under the lending test in New York. In the Binghampton AA, Buffalo AA, Dutchess County AA, Elmira AA, Glen Falls AA, Jamestown AA, Newburgh AA, Utica AA, and the Westchester County AA the bank's performance is weaker than the bank's overall performance in the state due to weaker borrower and geographic distribution. The weaker performance did not significantly impact the overall lending test performance as the AAs with Outstanding performance represent a majority of the bank's deposits and loans. Refer to Tables 1 through 11 in the State of New York section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in New York is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Rochester AA is adequate.

Refer to Table 14 in the State of New York section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, COB made six investments totaling \$804 thousand in the Rochester AA. There was one prior period investment still outstanding totaling \$192 thousand in the Rochester AA. In addition, there was one prior period investment for \$9 million in the larger statewide or regional area, which benefited the AA. COB also made 26 grants totaling \$71 thousand. The majority of the investments were made during the current period. COB exhibited a low level of complexity and was not innovative in its qualified investments. All of the investments were associated with affordable housing for low- and moderate-income

individuals, which is responsive to an identified need in the AA. All of the grants were associated with community services for low- and moderate-income individuals. The AA had a reasonable number of investment opportunities based upon discussions with bank management and community contacts. The Rochester AA is competitive as there were other large regionally and nationally active banks competing for qualified investments in this market.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Albany AA, Dutchess County AA, Newburgh AA, and the combined non-metropolitan AA is not inconsistent with the bank's overall Low Satisfactory performance under the investment test in New York. In the New York AA, the bank's performance is stronger than the bank's overall performance in the state, due to a higher volume of investment activity. In the Binghamton AA, Buffalo AA, Elmira AA, Glen Falls AA, Jamestown AA, Syracuse AA, Westchester AA and the Utica AA the bank's performance is weaker than the bank's overall performance in the state due to a lower volume of investment activity. The bank's performance in the limited scope AAs supported the overall investment test rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in New York is rated Outstanding. Based on a full-scope review, the bank's performance in the Rochester AA is excellent.

Retail Banking Services

Refer to Table 15 in the State of New York section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

COB's delivery systems were readily accessible to individuals and geographies of different income levels in the Rochester AA. Access to branches in low- and moderate-income areas was excellent.

The bank opened two branches in low-income areas and three branches in moderate-income areas over the course of the evaluation period, which improved accessibility in low- and moderate-income geographies. No branches were closed during the evaluation period.

COB's hours and services offered throughout the Rochester AA were good. Services offered and hours of operation were consistent across the branch network.

COB offered a variety of alternative delivery systems, which include full service ATMs and telephone banking including loan-by-phone services. On-line banking services included deposit applications, retail loan applications, home equity and mortgage loan applications, small business and commercial loan applications and bill payment services. We did not place significant weight on alternative delivery systems, as no data was available to determine the impact of these banking services on low- and moderate-income geographies and individuals.

COB offered an affordable checking account product that would be attractive to low- and moderate-income people. The account, which could be opened with as little as a \$50 initial deposit, featured no monthly maintenance fee and no minimum monthly balance.

Community Development Services

COB's performance in providing CD services in the Rochester AA was adequate and had a neutral impact on the service test performance. While CD services were responsive to local community development needs, the volume of services provided was moderate. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing credit counseling to low- and moderate-income individuals and technical expertise to non-profit or government organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Binghamton AA, Dutchess County AA, New York AA, Newburgh AA, Utica AA, Westchester AA, and the combined non-metropolitan AA is not inconsistent with the bank's overall Outstanding performance under the service test in New York. In the Albany AA, Buffalo AA, Glen Falls AA, Jamestown AA and Syracuse AA the bank's performance is weaker than the bank's overall performance in the state due to good branch distribution in these AAs. In the Elmira AA, the bank's performance is weaker than the bank's overall performance in the state due to adequate branch distribution. The weaker performance in some limited scope AAs did not have a significant impact on the overall service test rating. Refer to Table 15 in the State of New York section of Appendix D for the facts and data that support these conclusions.

State Rating

State of Illinois

CRA Rating for Illinois:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- A good volume of HMDA lending and a good responsiveness to the credit needs of the AA.
- An excellent distribution of loans among borrowers of different income levels.
- An excellent distribution of loans among geographies of different income levels.
- A good volume of community development lending that was responsive to the credit needs of the AA and had a positive impact on the lending test performance.
- An excellent level of investments that reflected good responsiveness to the credit and community development needs of the AA.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the AA. The bank's performance was positively impacted by branch openings in low- and moderate-income geographies.

Description of Institution's Operations in Illinois

COB had one AA within the State of Illinois, the Chicago AA. COB had 117 branches within the state, representing 17.7 percent of the bank's total branch network. Twenty-eight branches were opened in Illinois during the evaluation period.

As of June 30, 2003, the bank ranked 7th in total state deposits with a 2.16 percent market share. COB's statewide deposits totaled \$6.1 billion. Deposit competitors include Bank One, LaSalle, Harris, Northern Trust, and Fifth Third.

Based on deposits, Illinois was the third largest state rating area and accounted for approximately 21.9 percent of total bank deposits. During the evaluation period, COB originated 16 percent of its total HMDA loans and small loans to businesses in Illinois.

Refer to the Market Profiles for the State of Illinois in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in Illinois

We conducted a full-scope review of the Chicago AA. This was the only AA in the state and accounted for 100 percent of the state's deposits, HMDA loans, small loans to businesses, and branches. The State of Illinois rating is based entirely on the results of our analysis of the Chicago AA. Refer to the market profiles in Appendix C for detailed demographics and other performance context information on the full-scope AA.

We considered input received from community contacts. The two organizations contacted were involved primarily with affordable housing initiatives and the provision of social services to low- and moderate-income individuals. They stated a primary need in the Chicago AA was affordable housing programs including affordable mortgage loans and financial literacy. Small loans to individuals and other products to help low- and moderate-income individuals avoid predatory lenders were also an identified need. We considered these needs in our evaluation of COB's performance in the State of Illinois.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Illinois is rated Outstanding. Based on a full-scope review, the bank's performance in the Chicago AA is excellent.

Lending Activity

Refer to Table 1, Lending Volume in the State of Illinois section of Appendix D for the facts and data used to evaluate the bank's lending activity.

COB's overall lending activity in the full-scope AA is good. COB ranked 7th for deposits with a 2.89 percent market share. Based upon 2003 aggregate HMDA data, COB ranked 24th in home purchase lending (.83 percent market share) and 17th in refinance lending (1.24 percent market share) in the Chicago AA. While the market shares for HMDA loans were lower than the bank's deposit market share, performance was still considered good upon evaluation of the number of non-bank lenders in the market. The bank ranked 41st in small business lending; however, since small business lending was not a primary focal point for the bank, it did not significantly impact the overall conclusion.

Distribution of Loans by Income Level of the Geography

The geographic distribution of home mortgage loans and small loans to businesses reflects excellent penetration throughout the full-scope AA geographies.

The reader should note that in developing the conclusions for both geographic and borrower distribution, more consideration was given to 2003 data. The 2002 data is older and the more recent data better reflects steps taken by management to meet the credit needs of their AAs. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Home Mortgage Loans

Refer to Tables 2, 4 and 5 in the State of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home purchase loans was excellent. The geographic distribution of home purchase loans was excellent in 2002, 2003, and 2004.

In 2002, 2003, and 2004 the portion of home purchase loans made in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units and was excellent. The 2002 and 2003 low- and moderate-income geographic market share exceeded the overall market share and was excellent.

The overall geographic distribution of refinance loans was excellent. The geographic distribution of refinance loans was excellent in 2002, 2003, and 2004.

In 2002, 2003, and 2004 the portion of refinance loans made in low- and moderate-income geographies exceeded the percentage of owner-occupied units and was excellent. The 2002 and 2003 market share data is consistent with the excellent geographic distribution performance.

Multifamily home lending volume was moderate in the Chicago AA. However, the volume contributed only minimally to the overall lending volume in the AA.

The overall geographic distribution of multifamily lending was excellent. In 2002, 2003, and 2004, the portion of multifamily loans made in low- and moderate-income geographies exceeded the percentage of multifamily units in those geographies. The 2002 and 2003 market share performance was consistent with the excellent geographic distribution performance.

Small Loans to Businesses

Refer to Table 6 in the State of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses was good in 2002 and 2004 and excellent in 2003.

In 2002, the portion of small loans to businesses made in low-income geographies was somewhat lower than the portion of small businesses in those geographies and was adequate. Performance in moderate-income geographies was excellent with the portion of small loans to businesses in those geographies exceeding the corresponding portion of small businesses. The market share of small loans to businesses in low-income geographies was slightly lower than the bank's overall market share and was good. The market share of small loans to businesses in moderate-income geographies exceeded the bank's overall market share and reflected excellent performance.

In 2003, the portion of small loans to businesses made in low- and moderate-income geographies exceeded the portion of businesses in those geographies and reflected excellent performance. Market share performance for both low- and moderate-income geographies was also excellent and exceeded the bank's overall market share.

In 2004, the portion of small loans to businesses made in low-income geographies was somewhat lower than the portion of small businesses in those geographies and was adequate. The portion of small loans to businesses in moderate-income geographies significantly exceeded the portion of small businesses in those geographies and was excellent.

Lending Gap Analysis

We evaluated the lending distribution in the Chicago AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

This ratio is a bank wide calculation, and is not calculated by individual rating area or AA. Analysis is limited to bank originations. In 2002, 93.0 percent of HMDA loans were originated inside the bank's AAs and 97.4 percent of small loans to businesses were originated within the bank's AAs. In 2003, 92.0 percent of HMDA loans were originated inside the bank's AAs and 97.3 percent of small loans to businesses were originated within the bank's AAs. Performance at these levels is very positive.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans was excellent among borrowers of different income levels. The distribution of loans among borrowers of different income levels in the Chicago AA was excellent.

Home Mortgage Loans

Refer to Tables 8 and 10 in the State of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution for home purchase lending was excellent. Borrower distribution was excellent in 2002, 2003, and 2004.

In 2002, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered excellent after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was excellent. The market share of home purchase loans to low-income borrowers exceeded the bank's overall market share and was excellent. The market share of

home purchase loans to moderate-income borrowers was somewhat lower than the bank's overall market share and was adequate.

In 2003, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was excellent. The market share of home purchase loans to low-income borrowers exceeded the bank's overall market share and was excellent. The market share of home purchase loans to moderate-income borrowers was slightly lower than the bank's overall market share and was good.

In 2004, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families within the AA and was excellent. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Borrower distribution for refinance lending was excellent. Borrower distribution was excellent in 2002, 2003, and 2004.

In 2002, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families. After analyzing the portion of households below the poverty level in the AA, the distribution was considered good. The portion of refinance loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was excellent. The market share of low- and moderate-income exceeded the bank's overall market share and reflected excellent performance.

In 2003, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of households living below the poverty level. The portion of refinance loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA and was excellent. The market share of low- and moderate-income borrowers exceeded the bank's overall market share and was excellent.

In 2004, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of household living below the poverty level. The portion of refinance loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and reflected excellent performance. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Small Loans to Businesses

Refer to Table 11 in the State of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the Chicago AA was good. Distribution was good in 2002 and 2004 and excellent in 2003.

In 2002, the percentage of small loans to businesses was slightly lower than the percentage of small businesses and was good. The bank's market share of small loans to businesses significantly exceeded its overall market share and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2003, the percentage of small loans to businesses exceeded the percentage of small businesses and was excellent. The bank's market share of small loans to businesses also exceeded its overall market share and reflected excellent performance. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2004, the percentage of small loans to businesses was slightly lower than the percentage of small businesses and was good. The bank made a majority of its small loans to businesses in amounts below \$100,000. As the evaluation period did not cover the full year, we did not evaluate market share performance.

Community Development Lending

Refer to Table 1, Lending Volume in the State of Illinois section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

COB's good volume of CD lending had a positive impact on the evaluation of its lending performance in the Chicago AA. COB originated \$17.3 million in qualified CD loans in the AA during the evaluation period. Approximately, \$15 million of the CD loans supported affordable housing for low- and moderate-income individuals and showed good responsiveness to an important need in the Chicago AA.

Product Innovation and Flexibility

COB offered a standard product mix of loans including FHA loans and FNMA affordable housing loans. COB originated 24 loans under FNMA affordable housing programs during the evaluation period in the Chicago AA. COB also offered four affordable lending products through its Central Cities Homeownership Assistance Program (CCHAP). CCHAP products have flexible underwriting standards designed to assist low- and moderate-income people with home purchases. COB originated 1,162 CCHAP loans during the evaluation period in the Chicago AA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Illinois is rated Outstanding. Based on a full-scope review, the bank's performance in the Chicago AA is excellent.

Refer to Table 14 in the State of Illinois section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, COB made ten investments totaling \$45.3 million in the Chicago AA. There were six prior period investments totaling \$2.1 million still outstanding. COB also made 96 grants totaling \$1 million during the evaluation period. A substantial majority of the investments and grants were made during the evaluation period. More than 75 percent of the investments were associated with affordable housing for low- and moderate-income people, which is responsive to an important need within the AA. The AA had a large number of investment opportunities based upon discussions with bank management and community contacts. The Chicago AA is competitive as there were other large regionally and nationally active banks competing for qualified investments in this market.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Illinois is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Chicago AA is good.

Retail Banking Services

Refer to Table 15 in the State of Illinois section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

COB's delivery systems are accessible to individuals and geographies of different income levels in the Chicago AA. Access to branches in low-income areas is good and access in moderate-income areas is adequate.

The bank opened five branches in moderate-income areas and one branch in a low-income area during the evaluation period, which improved accessibility in low- and moderate-income geographies. The branch openings positively affected service test performance. No branches were closed during the evaluation period.

COB's hours and services offered throughout the Chicago AA were good. The services and hours of operation were consistent across the branch network.

COB offered a variety of alternative delivery systems, which included full service ATMs and telephone banking including loan-by-phone services. On-line banking services included deposit applications, retail loan applications, home equity and mortgage loan applications, small business and commercial loan applications and bill payment services. We did not place significant weight on alternative delivery systems, as no data was available to determine the impact of these banking services on low- and moderate-income geographies and individuals.

COB offered an affordable checking account product that would be attractive to low- and moderate-income people. The account, which could be opened with as little as a \$50 initial deposit, featured no monthly maintenance fee and no minimum monthly balance.

Community Development Services

COB's performance in providing CD services in the Chicago AA was adequate and had a neutral impact on the service test performance. While CD services were responsive to local community development needs, the volume of services provided was moderate. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing credit counseling to low- and moderate-income individuals and technical expertise to non-profit or government organizations.

State Rating

State of Michigan

CRA Rating for Michigan:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	High Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- A good volume of HMDA lending and a good responsiveness to the credit needs of the AAs.
- An excellent distribution of loans among borrowers of different income levels.
- A good distribution of loans among geographies of different income levels.
- An excellent volume of community development lending that was responsive to the credit needs of the AAs and had a positive impact on lending test performance.
- A good level of investments that reflects good responsiveness to the credit and community development needs of the AAs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the AAs and which were positively impacted by branch openings in low- and moderate-income geographies.

Description of Institution's Operations in Michigan

COB had seven AAs within the State of Michigan. They included the Ann Arbor AA, Detroit AA, Grand Rapids AA, Kalamazoo AA, Lansing AA, Saginaw AA and the combined non-metropolitan AA. COB had 115 branches within the state, representing 17.2 percent of the bank's total branch network. Thirteen branches were opened in Michigan during the evaluation period.

As of June 30, 2003, the bank ranked 7th in total state deposits with a 3.76 percent market share. COB's statewide deposits totaled \$5.2 billion. Deposit competitors include Standard Federal Bank, Comerica, Bank One, Fifth Third, and National City Bank.

Based on deposits, Michigan was the fourth largest state rating area and accounted for approximately 18.5 percent of total bank deposits. During the evaluation period, COB originated 25 percent of its total HMDA loans and small loans to businesses in Michigan.

Refer to the Market Profiles for the State of Michigan in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in Michigan

We conducted a full-scope review of the Detroit AA. This AA had 93.7 percent of the state's deposits and accounted for approximately 78 percent of the HMDA lending and 93 percent of the small loans to businesses in the state. The Detroit AA had 91 percent of the state's branches. We based our ratings for the State of Michigan primarily on the results of our analysis of the AA selected for full-scope review due to the majority of deposits and loans located in this AA. Refer to the market profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA.

We conducted limited scope reviews of the Ann Arbor AA, Grand Rapids AA, Kalamazoo AA, Lansing AA, Saginaw AA, and the combined non-metropolitan AA.

We considered input received from community contacts. The four organizations contacted were involved primarily with affordable housing initiatives and small business development. They stated the primary needs in the Detroit AA were affordable housing programs including affordable mortgage loans, financial literacy and small business lending including micro-lending. We considered these needs in our evaluation of COB's performance in the State of Michigan.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Michigan is rated Outstanding. Based on a full-scope review, the bank's performance in the Detroit AA is excellent.

Lending Activity

Refer to Table 1, Lending Volume in the State of Michigan section of Appendix D for the facts and data used to evaluate the bank's lending activity.

COB's overall lending activity in the full-scope AA is good. COB ranked fourth for deposits with a 6.49 percent market share. Based upon 2003 aggregate HMDA data, COB ranked 10th in home purchase lending (2.20 percent market share) and 8th in refinance lending (3.09 percent market share) in the Detroit AA. While the market shares for HMDA loans were lower than the bank's deposit market share, performance was still considered good upon evaluation of the number of non-bank lenders in the market. The bank ranked 22nd in small business lending; however, since small business lending was not a primary focal point for the bank, it did not significantly affect the overall conclusion.

Distribution of Loans by Income Level of the Geography

The geographic distribution of home mortgage loans and small loans to businesses reflects good penetration throughout the full-scope AA geographies.

The reader should note that in developing the conclusions for both geographic and borrower distribution, more consideration was given to 2003 data. The 2002 data is older and the more

recent data better reflects steps taken by management to meet the credit needs of their AAs. The 2004 data, although the most current, was for a partial year and does not include market share comparisons.

Home Mortgage Loans

Refer to Tables 2, 4 and 5 in the State of Michigan section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home purchase loans was excellent. The geographic distribution was good in 2002 and excellent in 2003 and 2004 in the Detroit AA.

In 2002, the portion of home purchase loans made in low-income geographies was somewhat lower than the percentage of owner-occupied housing units and was adequate. The portion of home purchase loans made in moderate-income geographies exceeded the percentage of owner-occupied units and reflected excellent performance. The market share in low- and moderate-income geographies exceeded the overall market share and was excellent.

In 2003, the portion of home purchase loans in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units and was excellent. The market share in low- and moderate-income geographies exceeded the overall market share and reflected excellent performance.

In 2004, the portion of home purchase loans in low- and moderate-income geographies exceeded the percentage of owner-occupied units and was excellent.

The overall geographic distribution of refinance loans was adequate. The geographic distribution of refinance loans was adequate in 2002 and 2003 and excellent in 2004.

In 2002, the portion of refinance loans made in low-income geographies was significantly lower than the percentage of owner-occupied units and was poor. The portion of refinance loans made in moderate-income geographies was somewhat lower than the percentage of owner-occupied units and reflected adequate performance. The market share in low-income geographies was slightly lower than the bank's overall market share and was good. The moderate-income market share data exceeded the overall market share and was excellent.

In 2003, the portion of refinance loans made in low- and moderate-income geographies was somewhat lower than the percentage of owner-occupied units and was adequate. The market share of refinance loans in low- and moderate-income geographies exceeded the bank's overall market share and reflected excellent performance.

In 2004, the portion of refinance loans made in low-income geographies was slightly lower than the corresponding percentage of owner-occupied units and was good. The portion of refinance loans in moderate-income geographies significantly exceeded the corresponding percentage of owner-occupied units and reflected excellent performance.

Multifamily home lending was minimal in the Detroit AA and was not meaningful to the performance of COB.

Small Loans to Businesses

Refer to Table 6 in the State of Michigan section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses was good in 2002, excellent in 2003, and adequate in 2004.

In 2002, the portion of small loans to businesses made in low-income geographies was somewhat lower than the portion of small businesses in those geographies and was adequate. Performance in moderate-income geographies was excellent with the portion of small loans to businesses in those geographies exceeding the corresponding portion of small businesses. The market share of small loans to businesses in low-income geographies was slightly lower than the bank's overall market share and was good. The market share of small loans to businesses in moderate-income geographies exceeded the bank's overall market share and reflected excellent performance.

In 2003, the portion of small loans to businesses made in low-income geographies was slightly lower than the portion of businesses in those geographies and was good. The portion of small loans to businesses in moderate-income geographies was excellent and exceeded the portion of small businesses in those geographies. Market share performance for both low- and moderate-income geographies was excellent and exceeded the bank's overall market share.

In 2004, the portion of small loans to businesses made in low-income geographies was significantly lower than the portion of small businesses in those geographies and reflected poor performance. The portion of small loans to businesses in moderate-income geographies was somewhat lower than the portion of small businesses in those geographies and adequate.

Lending Gap Analysis

We evaluated the lending distribution in the Detroit AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

This ratio is a bank wide calculation, and is not calculated by individual rating area or AA. Analysis is limited to bank originations. In 2002, 93.0 percent of HMDA loans were originated inside the bank's AAs and 97.4 percent of small loans to businesses were originated within the bank's AAs. In 2003, 92.0 percent of HMDA loans were originated inside the bank's AAs and 97.3 percent of small loans to businesses were originated within the bank's AAs. Performance at these levels is very positive.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans was excellent among borrowers of different income levels. The distribution of loans among borrowers of different income levels in the Detroit AA was excellent.

Home Mortgage Loans

Refer to Tables 8 and 10 in the State of Michigan section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution for home purchase lending was good. Borrower distribution was good in 2002 and 2004, and excellent in 2003.

In 2002, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was excellent. The market share of home purchase loans to low- and moderate-income borrowers was somewhat lower than the bank's overall market share and was adequate.

In 2003, the portion of home purchase loans to low-income borrowers was somewhat lower than the percentage of low-income families, but was considered excellent after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was excellent. The market share of home purchase loans to low-income borrowers exceeded the bank's overall market share and was excellent. The market share of home purchase loans to moderate-income borrowers was slightly lower than the bank's overall market share and was good.

In 2004, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families within the AA and was excellent. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Borrower distribution for refinance lending was excellent. Borrower distribution was excellent in 2002 and 2003 and good in 2004.

In 2002, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families. After analyzing the portion of households below the poverty level in the AA, the distribution was considered good. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families and was excellent. The market share of low- and moderate-income borrowers exceeded the bank's overall market share and reflected excellent performance.

In 2003, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered excellent after analyzing the percentage of households living below the poverty level. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was excellent. The market share of low- and moderate-income borrowers exceeded the bank's overall market share and was excellent.

In 2004, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate after analyzing the percentage of households living below the poverty level. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families and reflected excellent performance. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Small Loans to Businesses

Refer to Table 11 in the State of Michigan section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the Detroit AA was excellent. Distribution was excellent in 2002 and 2003, and good in 2004.

In 2002, the percentage of small loans to businesses exceeded the percentage of small businesses and was excellent. The bank's market share of small loans to businesses significantly exceeded its overall market share and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2003, the percentage of small loans to businesses exceeded the percentage of small businesses and was excellent. The bank's market share of small loans to businesses also exceeded its overall market share and reflected excellent performance. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2004, the percentage of small loans to businesses was slightly lower than the percentage of small businesses and was good. The bank made a majority of its small loans to businesses in amounts below \$100,000. As the evaluation period did not cover the full year, we did not evaluate market share performance.

Community Development Lending

Refer to Table 1, Lending Volume in the State of Michigan section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

COB's excellent volume of CD lending had a positive impact on the evaluation of its lending performance in the Detroit AA. COB originated \$83.5 million in qualified CD loans in the AA during the evaluation period. Approximately, \$49.7 million of the CD loans supported

affordable housing for low- and moderate-income individuals, which showed good responsiveness to an important need in the AA.

Product Innovation and Flexibility

COB offered a standard product mix of loans including FHA loans and FNMA affordable housing loans. COB originated 22 loans under FNMA affordable housing programs during the evaluation period in the Detroit AA. COB also offered four affordable lending products through its Central Cities Homeownership Assistance Program (CCHAP). CCHAP products have flexible underwriting standards designed to assist low- and moderate-income people with home purchases. COB originated 539 CCHAP loans during the evaluation period in the Detroit AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Ann Arbor AA, Grand Rapids AA, Kalamazoo AA, Lansing AA, Saginaw AA and the non-metropolitan AA is weaker than the bank's overall Outstanding performance under the lending test in Michigan. The weaker performance is due to weaker geographic and borrower distribution performance. The weaker performance in the limited scope AAs did not have a significant impact on the bank's overall lending test performance due to the small percentage of loans in these AAs. Refer to Tables 1 through 11 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Michigan is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Detroit AA is good.

Refer to Table 14 in the State of Michigan section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, COB made five investments totaling \$15.3 million in the Detroit AA. In addition, there were two current period investments totaling \$2.1 million and one prior period investment totaling \$733 thousand in the larger statewide or regional area, which benefited the AA. COB also made 75 grants totaling \$411 thousand during the evaluation period. All of the investments in the Detroit AA were made during the evaluation period. Almost all of the investments and grants were associated with affordable housing for low- or moderate-income people, which was responsive to an important need in the AA. COB exhibited a low level of complexity and was not innovative in its qualified investments. The AA had a large number of investment opportunities based upon discussions with bank management and community contacts. The Detroit AA was competitive as there were other large regionally and nationally active banks competing for qualified investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the combined non-metropolitan AA is not inconsistent with the bank's overall High Satisfactory performance under the investment test in Michigan. In the Ann Arbor AA, Grand Rapids AA, Lansing AA and Saginaw AA the bank's performance is stronger than the bank's overall performance in the state due to a larger volume of qualified investments. In the Kalamazoo AA, the bank's performance is weaker than the bank's overall performance in the state due to a lower volume of investments. The stronger performance in the limited scope AAs did not have a significant impact on the overall investment test performance due to the small percentage of deposits in these AAs.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Michigan is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Detroit AA is good.

Retail Banking Services

Refer to Table 15 in the State of Michigan section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

COB's delivery systems are accessible to individuals and geographies of different income levels in the Detroit AA. Access to branches in low- and moderate-income areas is good.

The bank opened three branches in moderate-income areas during the evaluation period, which improved accessibility in moderate-income geographies. The branch openings positively affected service test performance. No branches were closed during the evaluation period.

COB's hours and services offered throughout the Detroit AA were good. The services and hours of operation were consistent across the branch network.

COB offered a variety of alternative delivery systems, which included full service ATMs and telephone banking including loan-by-phone services. On-line banking services included deposit applications, retail loan applications, home equity and mortgage loan applications, small business and commercial loan applications and bill payment services. We did not place significant weight on alternative delivery systems, as no data was available to determine the impact of these banking services on low- and moderate-income geographies and individuals.

COB offered an affordable checking account product that would be attractive to low- and moderate-income people. The account, which could be opened with as little as a \$50 initial deposit, featured no monthly maintenance fee and no minimum monthly balance.

Community Development Services

COB's performance in providing CD services in the Detroit AA was adequate and had a neutral impact on the service test performance. While CD services were responsive to local community development needs, the volume of services provided was moderate. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services mostly involved the providing of credit counseling to low- and moderate-income individuals and technical expertise to non-profit to government organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Kalamazoo AA and the non-metropolitan AA is not inconsistent with the bank's overall High Satisfactory performance under the service test in Michigan. In the Ann Arbor AA, Grand Rapids AA, Lansing AA and the Saginaw AA, the bank's performance is weaker than the bank's overall performance in the state due to adequate branch distribution in these AAs. The weaker performance in the limited scope AAs did not have a significant impact on overall service test performance in the state due to the small percentage of deposits in these AAs. Refer to Table 15 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

State Rating

State of Vermont

CRA Rating for Vermont:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Low Satisfactory
The service test is rated:	Outstanding

The major factors that support this rating include:

- A good volume of HMDA lending and good responsiveness to the credit needs of the AAs.
- A good distribution of loans among borrowers of different income levels.
- A good distribution of loans among geographies of different income levels.
- An adequate level of investments that reflects good responsiveness to the credit and community development needs of the AAs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the AAs.

Description of Institution's Operations in Vermont

COB had two AAs within the State of Vermont. They included the Burlington AA and the non-metropolitan AA. COB had 27 branches within the state, representing 4.5 percent of the bank's total branch network. Two branches were opened in Vermont during the evaluation period.

As of June 30, 2003, the bank ranked third in total state deposits with a 10.79 percent market share. COB's statewide deposits totaled \$949 million. Deposit competitors include Chittenden Trust Company, BankNorth, Merchants Bank, and KeyBank.

Based on deposits, Vermont was the fifth largest state rating area and accounted for approximately 3.4 percent of total bank deposits. During the evaluation period, COB originated four percent of its total HMDA and small loans to businesses in Vermont.

Refer to the Market Profiles for the State of Vermont in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in Vermont

We conducted a full-scope review of the non-metropolitan AA. This AA had 70 percent of the state's deposits and accounted for approximately 62 percent of the HMDA lending and 67 percent of the small loans to businesses in the state. The non-metropolitan AA had 70 percent of the state's branches. We based our ratings for the State of Vermont primarily on the results

of our analysis of the AA selected for full-scope review due to the majority of deposits and loans located in this AA. Refer to the market profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA.

We conducted a limited scope review of the Burlington AA.

We considered input received from community contacts. The two organizations contacted were involved primarily with affordable housing initiatives. They stated a primary need in the non-metropolitan AA was affordable housing programs including affordable mortgage loans and financial literacy. We considered this need in our evaluation of COB's performance in the State of Vermont.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Vermont is rated High Satisfactory. Based on a full-scope review, the bank's performance in the non-metropolitan AA is good.

Lending Activity

Refer to Table 1, Lending Volume in the State of Vermont section of Appendix D for the facts and data used to evaluate the bank's lending activity.

COB's overall lending activity in the full-scope AA is good. COB ranked third for deposits with a 15.12 percent market share. Based upon 2003 aggregate HMDA data, COB ranked 7th in home purchase lending (4.92 percent market share) and second in refinance lending (10.15 percent market share) in the non-metropolitan AA. The bank ranked 20th in small business lending; however, since small business lending was not a primary focal point for the bank, it did not significantly impact the overall conclusion

Distribution of Loans by Income Level of the Geography

The geographic distribution of home mortgage loans and small loans to businesses reflects good penetration throughout the full-scope AA geographies.

There are no low-income geographies and only five moderate-income geographies in the six counties that comprise the full-scope assessment area. The reader should note that in developing the conclusions for both geographic and borrower distribution, more consideration was given to 2003 data. The 2002 data is older and the more recent data better reflects steps taken by management to meet the credit needs of their AAs. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Home Mortgage Loans

Refer to Tables 2, 4 and 5 in the State of Vermont section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home purchase loans was excellent. The geographic distribution was adequate in 2002 and excellent in 2003 and 2004 in the non-metropolitan AA.

In 2002, there were no home purchase loans made in the five moderate-income geographies. However, due to the very low percentage of owner-occupied units in these geographies the performance is considered adequate. Only .082 percent of the owner-occupied units are located in the moderate-income tracts and all lenders in the market made only 20 home purchase loans in these geographies in 2002.

In 2003, the portion of home purchase loans in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units and was excellent. The market share in moderate-income geographies also exceeded the overall market share and reflected excellent performance.

In 2004, the portion of home purchase loans in moderate-income geographies significantly exceeded the percentage of owner-occupied units and was excellent.

The overall geographic distribution of refinance loans was excellent. The geographic distribution of refinance loans was good in 2002 and excellent in 2003 and 2004.

In 2002, the portion of refinance loans made in moderate-income geographies was somewhat lower than the percentage of owner-occupied units and but reflected good performance due to very limited opportunities for lending moderate-income geographies. The market share in moderate-income geographies significantly exceeded the overall market share and was excellent.

In 2003, the portion of refinance loans made in moderate-income geographies exceeded the percentage of owner-occupied units and was excellent. The market share of refinance loans in moderate-income geographies exceeded the bank's overall market share and reflected excellent performance.

In 2004, the portion of refinance loans made in moderate-income geographies exceeded the corresponding percentage of owner-occupied units and reflected excellent performance.

Multifamily home lending was minimal in the non-metropolitan AA and was not meaningful to the performance of COB.

Small Loans to Businesses

Refer to Table 6 in the State of Vermont section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses was adequate in 2002 and excellent in 2003 and 2004.

In 2002, there were no small loans to businesses made in moderate-income geographies. With only .045 percent of small businesses located in these geographies, there were very

limited opportunities for lending. Performance was adequate upon consideration of the limited lending opportunities.

In 2003, the portion of small loans to businesses made in moderate-income geographies exceeded the portion of businesses in those geographies and was excellent. Market share performance for moderate-income geographies also exceeded the bank's overall market share and was excellent.

In 2004, the portion of small loans to businesses made in moderate-income geographies exceeded the portion of small businesses in those geographies and reflected excellent performance.

Lending Gap Analysis

We evaluated the lending distribution in the non-metropolitan AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

This ratio is a bank wide calculation, and is not calculated by individual rating area or AA. Analysis is limited to bank originations. In 2002, 93.0 percent of HMDA loans were originated inside the bank's AAs and 97.4 percent of small loans to businesses were originated within the bank's AAs. In 2003, 92.0 percent of HMDA loans were originated inside the bank's AAs and 97.3 percent of small loans to businesses were originated within the bank's AAs. Performance at these levels is very positive.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans was good among borrowers of different income levels. The distribution of loans among borrowers of different income levels in the non-metropolitan AA was good.

Home Mortgage Loans

Refer to Tables 8 and 10 in the State of Vermont section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution for home purchase lending was good. Borrower distribution was adequate in 2002 and 2004, and good in 2003.

In 2002, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families and was considered poor even after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families and was adequate. The market share of home purchase loans to low-income

borrowers was slightly lower than the bank's overall market share and was good. The market share of home purchase loans to moderate-income borrowers exceeded the bank's overall market share and was excellent.

In 2003, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers was slightly lower than the percentage of moderate-income families and was good. The market share of home purchase loans to low-income borrowers exceeded the bank's overall market share and was excellent. The market share of home purchase loans to moderate-income borrowers was slightly lower than the bank's overall market share and was good.

In 2004, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families and was considered poor even after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families within the AA and was adequate. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Borrower distribution for refinance lending was excellent. Borrower distribution was adequate in 2002 and excellent in 2003 and 2004.

In 2002, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families. Even after analyzing the portion of households below the poverty level in the AA, the distribution was considered poor. The portion of refinance loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families and was adequate. The market share of low and moderate-income families exceeded the bank's overall market share and reflected excellent performance.

In 2003, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of households living below the poverty level. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was excellent. The market share of low- and moderate-income families exceeded the bank's overall market share and was excellent.

In 2004, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered good after analyzing the percentage of household living below the poverty level. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families and reflected excellent performance. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Small Loans to Businesses

Refer to Table 11 in the State of Vermont section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the non-metropolitan AA was good in 2002 and excellent in 2003 and 2004.

In 2002, the percentage of small loans to businesses was slightly lower than the percentage of small businesses and was good. The bank's market share of small loans to businesses significantly exceeded its overall market share and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2003, the percentage of small loans to businesses exceeded the percentage of small businesses and was excellent. The bank's market share of small loans to businesses also exceeded its overall market share and reflected excellent performance. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2004, the percentage of small loans to businesses exceeded the percentage of small businesses and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100,000. As the evaluation period did not cover the full year, we did not evaluate market share performance.

Community Development Lending

Refer to Table 1, Lending Volume in the State of Vermont section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

COB's level of CD lending had a neutral impact on the evaluation of its lending performance in the combined non-metropolitan AA. COB did not originate any qualified CD loans in the AA during the evaluation period.

Product Innovation and Flexibility

COB offered a standard product mix of loans including FHA loans and FNMA affordable housing loans. COB also offered four affordable lending products through its Central Cities Homeownership Assistance Program (CCHAP). CCHAP products have flexible underwriting standards designed to assist low- and moderate-income people with home purchases.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Burlington AA is not inconsistent with the bank's overall High Satisfactory performance under the lending test in Vermont. Refer to Tables 1 through 11 in the State of Vermont section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Vermont is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the non-metropolitan AA is adequate.

Refer to Table 14 in the State of Vermont section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, COB made three investments totaling \$395 thousand in the non-metropolitan AA. COB also made one grant totaling \$50 thousand during the evaluation period. A substantial majority of the investments were associated with affordable housing for low- and moderate-income people, which is responsive to an important need in the AA. COB exhibited a low level of complexity and was not innovative in its qualified investments. The non-metropolitan AA had a reasonable number of investment opportunities based upon discussions with bank management and community contacts.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the Burlington AA is stronger than the bank's overall performance in the state due to a higher volume of qualified investments. The stronger performance in the limited scope AA did not have a significant impact on the overall investment test performance for the state.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Vermont is rated Outstanding. Based on a full-scope review, the bank's performance in the non-metropolitan AA is excellent.

Retail Banking Services

Refer to Table 15 in the State of Vermont section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

COB has an excellent distribution of delivery systems that are readily accessible to individuals and geographies of different income levels in the non-metropolitan AA. There are no low-income areas within the non-metropolitan AA. Access to branches in moderate-income geographies is excellent.

The bank opened one branch in a moderate-income area over the course of the evaluation period. The branch opening positively affected service test performance. No branches were closed during the evaluation period.

COB's hours and services offered throughout the full-scope AA were good. The services offered and hours of operation of the branches were consistent across the branch network.

COB offered a variety of alternative delivery systems, which included full service ATMs and telephone banking including loan-by-phone services. On-line banking services included deposit applications, retail loan applications, home equity and mortgage loan applications, small business and commercial loan applications and bill payment services. We did not place significant weight on alternative delivery systems, as no data was available to determine the impact of these banking services on low- and moderate-income geographies and individuals.

COB offered an affordable checking account product that would be attractive to low- and moderate-income people. The account, which could be opened with as little as a \$50 initial deposit, featured no monthly maintenance fee and no minimum monthly balance.

Community Development Services

COB's performance in providing CD services in the non-metropolitan AA was adequate and had a neutral impact on the service test performance. While CD services were responsive to local community development needs, the volume of services provided was moderate. Management was involved in community development programs that were targeted to low- and moderate-income individuals and moderate-income geographies. These services mostly involved providing credit counseling to low- and moderate-income individuals and technical expertise to non-profit or government organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Burlington AA is not inconsistent with the bank's overall Outstanding performance under the service test in Vermont. Refer to Table 15 in the State of Vermont section of Appendix D for the facts and data that support these conclusions.

State Rating

State of Massachusetts

CRA Rating for Massachusetts:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Low Satisfactory
The service test is rated:	Outstanding

The major factors that support this rating include:

- An excellent volume of HMDA lending and a good responsiveness to the credit needs of the AAs.
- A good distribution of loans among borrowers of different income levels.
- A good distribution of loans among geographies of different income levels.
- An adequate level of investments that reflects good responsiveness to the credit and community development needs of the AAs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the AAs.

Description of Institution's Operations in Massachusetts

COB had four AAs within the State of Massachusetts. They included the Boston AA, Pittsfield AA, Springfield AA and the Worcester AA. The Boston, Pittsfield and Worcester AAs were added in 2003 due to de novo branching activities. COB had 13 branches within the state, representing 1.9 percent of the bank's total branch network. Four branches were opened in Massachusetts during the evaluation period.

As of June 30, 2003, the bank ranked 52nd in total state deposits with a .24 percent market share. COB's statewide deposits totaled \$417 million. Deposit competitors include Fleet, Citizens Bank, State Street Bank and Trust, and Sovereign.

Based on deposits, Massachusetts was the sixth largest state rating area and accounted for approximately 1.5 percent of total bank deposits. During the evaluation period, COB originated 3 percent of its total HMDA loans and small loans to businesses in Massachusetts.

Refer to the Market Profiles for the State of Massachusetts in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in Massachusetts

We conducted a full-scope review of the Springfield AA. This AA had 100 percent of the state's deposits as of June 30, 2003 and accounted for approximately 98 percent of the HMDA lending and 100 percent of the small loans to businesses in the state. The Springfield AA had 77 percent of the state's branches. We based our ratings for the State of Massachusetts primarily on the results of our analysis of the AA selected for full-scope review due to the majority of deposits and loans located in this AA. Refer to the market profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA.

We conducted limited scope reviews of the Boston AA, Pittsfield AA, and Worcester AA.

We considered input received from community contacts. The organization contacted was involved primarily with affordable housing initiatives. They stated a primary need in the Springfield AA was affordable housing programs including affordable mortgage loans and financial literacy training. We considered this need in our evaluation of COB's performance in the State of Massachusetts.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Massachusetts is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Springfield AA is good.

Lending Activity

Refer to Table 1, Lending Volume in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the bank's lending activity.

COB's overall lending activity in the full-scope AA is excellent. COB ranked ninth in deposits with a 4.90 percent market share. Based upon 2003 aggregate HMDA data, COB ranked eighth in home purchase lending (3.24 percent market share) and third in refinance lending (5.20 percent market share) in the Springfield AA. The bank ranked 29th in small business lending; however, since small business lending was not a primary focal point for the bank, it did not significantly impact the overall conclusion

Distribution of Loans by Income Level of the Geography

The geographic distribution of home mortgage loans and small loans to businesses reflects good penetration throughout the full-scope AA geographies.

The reader should note that in developing the conclusions for both geographic and borrower distribution, more consideration was given to 2003 data. The 2002 data is older and the more recent data better reflects steps taken by management to meet the credit needs of their AAs. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Home Mortgage Loans

Refer to Tables 2, 4 and 5 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home purchase loans was excellent. The geographic distribution was good in 2002 and excellent in 2003 and 2004 in the Springfield AA.

In 2002, the portion of home purchase loans made in low-income geographies was somewhat lower than the percentage of owner-occupied housing units and was adequate. The portion of home purchase loans made in moderate-income geographies exceeded the percentage of owner-occupied units and reflected excellent performance. The market share in low-income geographies was significantly lower than the bank's overall market share and was poor. The market share in moderate-income geographies was slightly lower than the overall market share and was good.

In 2003, the portion of home purchase loans in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units and was excellent. The market share in low-income geographies was somewhat lower than the bank's overall market share and was adequate. The market share in moderate-income geographies exceeded the overall market share and reflected excellent performance.

In 2004, the portion of home purchase loans in low- and moderate-income geographies exceeded the percentage of owner-occupied units and was excellent.

The overall geographic distribution of refinance loans was adequate. The geographic distribution of refinance loans was adequate in 2002 and 2003 and excellent in 2004.

In 2002, the portion of refinance loans made in low- and moderate-income geographies was somewhat lower than the percentage of owner-occupied units and was adequate. The market share in low- and moderate-income geographies was somewhat lower than the bank's overall market share and was adequate.

In 2003, the portion of refinance loans made in low-income geographies was somewhat lower than the percentage of owner-occupied units and was adequate. The portion of refinance loans made in moderate-income geographies was slightly lower than the percentage of owner-occupied units and was good. The market share of refinance loans in low-income geographies was somewhat lower than the bank's overall market share and was adequate. The market share in moderate-income geographies exceeded the bank's overall market share and reflected excellent performance.

In 2004, the portion of refinance loans made in low- and moderate-income geographies exceeded the corresponding percentage of owner-occupied units and was excellent.

There was no multifamily home lending in the Springfield AA; therefore, this lending was not meaningful to the performance of COB.

Small Loans to Businesses

Refer to Table 6 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses was excellent. Geographic distribution was excellent in 2002 and 2003 and good in 2004.

In 2002, the portion of small loans to businesses made in low-income geographies exceeded the portion of small businesses in those geographies and was excellent. Performance in moderate-income geographies was good with the portion of small loans to businesses in those geographies slightly lower than the corresponding portion of small businesses. The market share of small loans to businesses in low- and moderate-income geographies exceeded the bank's overall market share and was excellent.

In 2003, the portion of small loans to businesses made in low- and moderate-income geographies exceeded the portion of businesses in those geographies and was excellent. Market share performance for both low- and moderate-income geographies was excellent and exceeded the bank's overall market share.

In 2004, the portion of small loans to businesses made in low-income geographies was significantly lower than the portion of small businesses in those geographies and was poor. The portion of small loans to businesses made in moderate-income geographies exceeded the portion of small businesses in those geographies and reflected excellent performance.

Lending Gap Analysis

We evaluated the lending distribution in the Springfield AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

This ratio is a bank wide calculation, and is not calculated by individual rating area or AA. Analysis is limited to bank originations. In 2002, 93.0 percent of HMDA loans were originated inside the bank's AAs and 97.4 percent of small loans to businesses were originated within the bank's AAs. In 2003, 92.0 percent of HMDA loans were originated inside the bank's AAs and 97.3 percent of small loans to businesses were originated within the bank's AAs. Performance at these levels is very positive.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans was good among borrowers of different income levels. The distribution of loans among borrowers of different income levels in the Springfield AA was good.

Home Mortgage Loans

Refer to Tables 8 and 10 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution for home purchase lending was good. Borrower distribution was adequate in 2002 and good in 2003 and 2004.

In 2002, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families and was considered poor even after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers was slightly lower than the percentage of moderate-income families and was good. The market share of home purchase loans to low-income borrowers was slightly lower than the bank's overall market share and was good. The market share of home purchase loans to moderate-income borrowers was somewhat lower than the bank's overall market share and was adequate.

In 2003, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was excellent. The market share of home purchase loans to low-income borrowers was somewhat lower than the bank's overall market share and was adequate. The market share of home purchase loans to moderate-income borrowers exceeded the bank's overall market share and was excellent.

In 2004, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families within the AA and was excellent. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Borrower distribution for refinance lending was good. Borrower distribution was adequate in 2002 and good in 2003 and 2004.

In 2002, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families. Even after analyzing the portion of households below the poverty level in the AA, the distribution was considered poor. The portion of refinance loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families and was adequate. The market share of low- and moderate-income families was slightly lower than the bank's overall market share and reflected good performance.

In 2003, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate after analyzing the percentage of households living below the poverty level. The portion of refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA

and was excellent. The market share of low- and moderate-income families exceeded the bank's overall market share and was excellent.

In 2004, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate after analyzing the percentage of household living below the poverty level. The portion of refinance loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and reflected excellent performance. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Small Loans to Businesses

Refer to Table 11 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the Springfield AA was excellent. Distribution was excellent in 2002, 2003, and 2004.

In 2002, the percentage of small loans to businesses matched the percentage of small businesses and was excellent. The bank's market share of small loans to businesses significantly exceeded its overall market share and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2003, the percentage of small loans to businesses exceeded the percentage of small businesses and was excellent. The bank's market share of small loans to businesses also exceeded its overall market share and reflected excellent performance. The bank made a majority of its small loans to businesses in amounts below \$100,000.

In 2004, the percentage of small loans to businesses exceeded the percentage of small businesses and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100,000. As the evaluation period did not cover the full year, we did not evaluate market share performance.

Community Development Lending

Refer to Table 1, Lending Volume in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

COB's level of CD lending had a neutral impact on the evaluation of its lending performance in the Springfield AA. COB did not originate any qualified CD loans in the AA during the evaluation period.

Product Innovation and Flexibility

COB offered a standard product mix of loans including FHA loans and FNMA affordable housing loans. COB also offered four affordable lending products through its Central Cities Homeownership Assistance Program (CCHAP). CCHAP products have flexible underwriting standards designed to assist low- and moderate-income people with home purchases.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Boston AA, Pittsfield AA and Worcester AA is weaker than the bank's overall High Satisfactory performance under the lending test in Massachusetts. The weaker performance is due to weaker geographic and borrower distribution; however, due to the entry into these markets in the latter half of 2003, the weaker performance does not significantly influence the overall rating for Massachusetts. Refer to Tables 1 through 11 in the State of Massachusetts section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Massachusetts is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Springfield AA is adequate.

Refer to Table 14 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, COB made three investments totaling \$756 thousand in the Springfield AA. COB also made two grants totaling \$6 thousand during the evaluation period. All of the grants and investments were made during the current evaluation period. COB exhibited a low level of complexity and was not innovative in its qualified investments. All of the investments were associated with affordable housing for low- and moderate-income people, which is responsive to an important need within the AA. Both grants were associated with community services. The AA had a reasonable number of investment opportunities based upon discussions with bank management and community contacts.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Worcester AA is not inconsistent with the bank's overall Low Satisfactory performance under the investment test in Massachusetts. In the Boston AA and the Pittsfield AA, the bank's performance is weaker than the bank's overall performance in the state due to a lack of qualified investments; however, due to the entry into these markets in the latter half of 2003, the weaker performance does not significantly influence the overall rating for Massachusetts.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Massachusetts is rated Outstanding. Based on a full-scope review, the bank's performance in the Springfield AA is excellent.

Retail Banking Services

Refer to Table 15 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

COB has an excellent distribution of delivery systems that are readily accessible to individuals and geographies of different income levels in the Springfield AA. Access to branches in low-income areas is good and in moderate-income areas, access to branches is excellent. More weight was given to the bank's distribution in moderate-income geographies since the percentage of the population living in moderate-income geographies is significantly higher than the percentage living in low-income geographies.

The bank did not open or close any branches in low- or moderate-income areas during the scope of the examination.

COB's hours and services offered throughout the full-scope AA were good. The services offered and hours of operation of the branches were consistent across the branch network.

COB offered a variety of alternative delivery systems, which included full service ATMs and telephone banking including loan-by-phone services. On-line banking services included deposit applications, retail loan applications, home equity and mortgage loan applications, small business and commercial loan applications and bill payment services. We did not place significant weight on alternative delivery systems, as no data was available to determine the impact of these banking services on low- and moderate-income geographies and individuals.

COB offered an affordable checking account product that would be attractive to low- and moderate-income people. The account, which could be opened with as little as a \$50 initial deposit, featured no monthly maintenance fee and no minimum monthly balance.

Community Development Services

COB's performance in providing CD services in the Springfield AA was adequate and had a neutral impact on the service test performance. While CD services were responsive to local community development needs, the volume of services provided was moderate. Management was involved in community development programs that were targeted to low- and moderate-income individuals and moderate-income geographies. These services mostly involved providing credit counseling to low- and moderate-income individuals and technical expertise to non-profit or government organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Worcester AA is not inconsistent with the bank's overall Outstanding performance under the service test in Massachusetts. In the Boston AA and Pittsfield AA, the bank's performance is weaker than the bank's overall performance in the state due to the adequate branch distribution in these AAs; however, due to the entry into these markets in the latter half of 2003, the weaker performance does not significantly influence the overall rating for Massachusetts. Refer to Table 15 in the State of Massachusetts section of Appendix D for the facts and data that support these conclusions.

State Rating

State of Indiana

CRA Rating for Indiana:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Low Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating:

- A good volume of HMDA lending and a good responsiveness to the credit needs of the AAs.
- An adequate distribution of loans among borrowers of different income levels.
- An adequate distribution of loans among geographies of different income levels.
- An adequate level of investments that reflects adequate responsiveness to the credit and community development needs of the AAs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the AAs.

Description of Institution's Operations in Indiana

COB entered the Indiana market in the 2003 through de novo branching and this branching effort created two AAs within the State of Indiana. These were the Indianapolis AA and Lafayette AA. COB had 40 branches within the state, representing 6.0 percent of the bank's total branch network. All 40 branches were opened during the evaluation period.

COB had no deposits in Indiana as of June 30, 2003. As of June 30, 2004, the bank ranked 124th in total state deposits with a .12 percent market share. COB's statewide deposits totaled \$101 million. Deposit competitors include Bank One, National City, Fifth Third, and KeyBank.

Based on deposits, Indiana was the smallest state rating area and accounted for less than one percent of total bank deposits. During the evaluation period, COB originated less than one percent of its total HMDA loans and small loans to businesses in Indiana.

Refer to the Market Profiles for the State of Indiana in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in Indiana

We conducted a full-scope review of the Indianapolis AA. This AA had 90.7 percent of the state's deposits and accounted for approximately 90 percent of the HMDA lending and 100 percent of the small loans to businesses in the state. The Indianapolis AA had 93 percent of

the state's branches. We based our ratings for the State of Indiana primarily on the results of our analysis of the AA selected for full-scope review due to the majority of deposits and loans located in this AA. Refer to the market profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA. We considered the recent entry into the Indianapolis market and the challenges to market entry due to competition from established large and regional banks when evaluating performance. The challenges of entering this new market were a mitigating factor in our evaluation of the bank's performance.

We conducted a limited scope review of the Lafayette AA.

We considered input received from community contacts. The four organizations contacted were involved primarily with affordable housing initiatives. They stated a primary need in the Indianapolis AA was affordable housing programs including affordable mortgage loans, affordable rental properties, and financial literacy. We considered this need in our evaluation of COB's performance in the State of Indiana.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Indiana is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Indianapolis AA is adequate.

Lending Activity

Refer to Table 1, Lending Volume in the State of Indiana section of Appendix D for the facts and data used to evaluate the bank's lending activity.

COB's overall lending activity in the full-scope AA is good. COB ranked 30th for deposits with a .36 percent market share based upon June 2004 deposit data. COB did not have any deposits as of June 2003 in the Indianapolis AA. Based upon 2003 aggregate HMDA data, COB ranked 41st in home purchase lending (.62 percent market share) and 111th in refinance lending (.11 percent market share) in the Indianapolis AA. The bank did not have any small business loans in 2003 in the Indianapolis AA; however, since small business lending was not a primary focal point for the bank and the fact that this is a new market for COB, the lack of small loans to businesses did not significantly impact the overall conclusion.

Distribution of Loans by Income Level of the Geography

The geographic distribution of home mortgage loans and small loans to businesses reflects adequate penetration throughout the full-scope geographies. The bank's performance was mitigated by their recent entry into the AA and consideration was given to this factor in determining our conclusions for geographic distribution as described in the Scope of Evaluation section above.

The reader should note that in developing the conclusions for both geographic and borrower distribution, more consideration was given to 2004 data. The 2003 data is older and the more recent data better reflects steps taken by management to meet the credit needs of the AAs.

For the State of Indiana both 2003 and 2004 were partial years due to the timing of the branch openings in 2003. Since 2004 was a partial year, no market share data was available for that period.

Home Mortgage Loans

Refer to Tables 2, 4 and 5 in the State of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home purchase loans was adequate. The geographic distribution was adequate in 2003 and 2004 in the Indianapolis AA.

In 2003, the portion of home purchase loans in low- and moderate-income geographies was significantly lower than the percentage of owner-occupied housing units and was adequate upon consideration of the recent market entry. The market share in low- and moderate-income geographies was significantly lower than the overall market share and reflected similar adequate performance.

In 2004, the portion of home purchase loans in low- and moderate-income geographies was significantly lower than the percentage of owner-occupied units and was adequate upon consideration of the recent entry into this market.

The overall geographic distribution of refinance loans was adequate. The geographic distribution of refinance loans was adequate in 2003 and 2004.

In 2003, the portion of refinance loans made in low- and moderate-income geographies was significantly lower than the percentage of owner-occupied units and was adequate upon consideration of the recent entry into this market. The market share of refinance loans in low- and moderate-income geographies was significantly lower than the bank's overall market share and reflected similar adequate performance.

In 2004, the portion of refinance loans made in low-income geographies was significantly lower than the corresponding percentage of owner-occupied units and was adequate upon consideration of the recent market entry. The portion of refinance loans in moderate-income geographies was somewhat lower than the corresponding percentage of owner-occupied units and reflected adequate performance.

There was no multifamily home lending in the Indianapolis AA; therefore, this lending was not meaningful to the performance of COB.

Small Loans to Businesses

Refer to Table 6 in the State of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

COB made only three small loans to businesses during the evaluation period. This lending was not considered in our evaluation due to the bank's primary lending focus on HMDA products and the bank's recent entry into the State of Indiana.

Lending Gap Analysis

We evaluated the lending distribution in the Indianapolis AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

This ratio is a bank wide calculation, and is not calculated by individual rating area or AA. Analysis is limited to bank originations. In 2003, 92.0 percent of HMDA loans were originated inside the bank's AAs and 97.3 percent of small loans to businesses were originated within the bank's AAs. Performance at these levels is very positive.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans was adequate among borrowers of different income levels. The distribution of loans among borrowers of different income levels in the Indianapolis AA was adequate. The bank's performance was mitigated by their recent entry into the AA and consideration was given to this factor in determining our conclusions for geographic distribution as described in the Scope of Evaluation section above.

Home Mortgage Loans

Refer to Tables 8 and 10 in the State of Indiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution for home purchase lending was adequate. Borrower distribution was adequate in 2003 and 2004.

In 2003, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate after analyzing the percentage of households living below the poverty level and recent entry into the AA. The portion of home purchase loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families and was adequate. The market share of home purchase loans to low- and moderate-income borrowers was significantly lower than the bank's overall market share and was adequate upon consideration of the mitigating factors described in the state Scope Section.

In 2004, the portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families and was considered poor even after analyzing the percentage of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers slightly lower than the percentage of moderate-income families

within the AA and was good. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Borrower distribution for refinance lending was good. Borrower distribution was adequate in 2003 and excellent in 2004.

In 2003, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate after analyzing the percentage of households living below the poverty level and the recent entry into the market. The portion of refinance loans to moderate-income borrowers was significantly lower than the percentage of moderate-income families in the AA and was likewise considered adequate. The market share of low- and moderate-income families was significantly lower than the bank's overall market share and was adequate.

In 2004, the portion of refinance loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered excellent after analyzing the percentage of household living below the poverty level. The portion of refinance loans to moderate-income borrowers was slightly lower than the percentage of moderate-income families and reflected good performance. We did not evaluate market share performance for 2004 as the evaluation period only covered partial year lending data.

Small Loans to Businesses

Refer to Table 11 in the State of Indiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

COB made only three small loans to businesses during the evaluation period. This lending was not considered in our evaluation due to the bank's primary lending focus on HMDA products and the banks recent entry into the State of Indiana.

Community Development Lending

Refer to Table 1, Lending Volume in the State of Indiana section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

COB's level of CD lending had a neutral impact on the evaluation of its lending performance in the Indianapolis AA. COB did not originate any qualified CD loans in the AA during the evaluation period.

Product Innovation and Flexibility

COB offered a standard product mix of loans including FHA loans and FNMA affordable housing loans. COB also offered four affordable lending products through its Central Cities Homeownership Assistance Program (CCHAP). CCHAP products have flexible underwriting standards designed to assist low- and moderate-income people with home purchases.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Lafayette AA is stronger than the bank's overall Low Satisfactory performance under the lending test in Indiana due to better geographic and borrower distribution. This stronger performance had a positive impact on the overall lending test conclusion for the state. Refer to Tables 1 through 11 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Indiana is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Indianapolis AA is adequate.

Refer to Table 14 in the State of Indiana section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, COB made one investment totaling \$593 thousand in the Indianapolis AA. The bank had no prior period investments still outstanding as COB entered this state and AA in 2003 through de novo branching activity. The fact that the state and AA were new was considered in arriving at the Investment Test ratings. COB exhibited a low level of complexity and was not innovative in its qualified investments. The investment was associated with affordable housing for low- and moderate-income people, which is responsive to an important need within the AA. The AA had a reasonable number of investment opportunities base upon discussions with bank management and community contacts. The Indianapolis AA is competitive as there were other large regionally and nationally active banks competing for qualified investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the Lafayette AA is weaker than the bank's overall Low Satisfactory performance under the investment test in Indiana due to a lack of qualified investments. Due to the recent entry into the state, the weaker performance did affect the bank's overall performance.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Indiana is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Indianapolis AA is good.

Retail Banking Services

Refer to Table 15 in the State of Indiana section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

COB has a good distribution of delivery systems that are accessible to individuals and geographies of different income levels in the Indianapolis AA. Access to branches in moderate-income areas access to branches is good.

The bank opened eight branches in moderate-income areas during the scope of the examination. The branch openings positively affected service test performance. No branches were closed during the evaluation period.

COB's hours and services offered throughout the full-scope AA were good. The services offered and hours of operation of the branches were consistent across the branch network.

COB offered a variety of alternative delivery systems, which included full service ATMs and telephone banking including loan-by-phone services. On-line banking services included deposit applications, retail loan applications, home equity and mortgage loan applications, small business and commercial loan applications and bill payment services. We did not place significant weight on alternative delivery systems, as no data was available to determine the impact of these banking services on low- and moderate-income geographies and individuals.

COB offered an affordable checking account product that would be attractive to low- and moderate-income people. The account, which could be opened with as little as a \$50 initial deposit, featured no monthly maintenance fee and no minimum monthly balance.

Community Development Services

COB's performance in providing CD services in the Indianapolis AA was adequate and had a neutral impact on the service test performance. While CD services were responsive to local community development needs, the volume of services provided was moderate. Management was involved in community development programs that were targeted to low- and moderate-income individuals and moderate-income geographies. These services mostly involved providing credit counseling to low- and moderate-income individuals and technical expertise to non-profit or government organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Lafayette AA is not inconsistent with the bank's overall High Satisfactory performance under the service test in Indiana. Refer to Table 15 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/02 to 06/30/04) Investment and Service Tests and CD Loans: (01/01/02 to 08/31/04)	
Financial Institution	Products Reviewed	
Charter One Bank N.A. (COB) Cleveland Ohio	Home Purchase and Refinance loans, Multifamily loans, small business loans, community development loans, investments and services.	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Ohio		
Cleveland	Full Scope	MSA 1680
Akron	Limited Scope	MSA 0080
Canton	Limited Scope	MSA 1320
Toledo	Limited Scope	MSA 8400
Youngstown	Limited Scope	MSA 9320
Scioto County	Limited Scope	Non-metropolitan
Tuscarawas County	Limited Scope	Non-Metropolitan
New York		
Rochester	Full Scope	MSA 6840
Albany	Limited Scope	MSA 0160
Binghampton	Limited Scope	MSA 0960
Buffalo	Limited Scope	MSA 1280
Dutchess County	Limited Scope	MSA 2281
Elmira	Limited Scope	MSA 2335
Glen Falls	Limited Scope	MSA 2975
Jamestown	Limited Scope	MSA 3610
New York (Putnam and Rockland Counties)	Limited Scope	MSA 5600
Newburgh	Limited Scope	MSA 5660
Syracuse	Limited Scope	MSA 8160
Utica	Limited Scope	MSA 8680
Westchester County	Limited Scope	MSA 5600
Chenango-Otsego	Limited Scope	Non-metropolitan
Clinton County	Limited Scope	Non-metropolitan
Columbia County	Limited Scope	Non-metropolitan
Cortland Country	Limited Scope	Non-metropolitan

Essex County Franklin County Fulton County Greene County Hamilton County Lewis County Sullivan County Tompkins County Ulster County	Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	Non-metropolitan Non-metropolitan Non-metropolitan Non-metropolitan Non-metropolitan Non-metropolitan Non-metropolitan Non-metropolitan
Illinois Chicago	Full Scope	MSA 1600
Michigan Detroit Ann Arbor Grand Rapids Kalamazoo Lansing Saginaw Shiawassee County	Full Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	MSA 2160 MSA 0440 MSA 3000 MSA 3720 MSA 4040 MSA 6960 Non-metropolitan
Vermont Combined Non-metropolitan (Addison, Bennington, Rutland, Washington, Windham, and Windsor Counties) Burlington	Full-Scope Limited Scope	Non-metropolitan MSA 1305
Massachusetts Springfield Boston Pittsfield Worcester	Full Scope Limited Scope Limited Scope Limited Scope	MSA 8000 MSA 1120 MSA 6320 MSA 9240
Indiana Indianapolis Lafayette	Full Scope Limited Scope	MSA 3480 MSA 3920

Appendix B: Summary of State Ratings

RATINGS Charter One Bank N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
Charter One Bank N.A.	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
State:				
Ohio	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
New York	Outstanding	Low Satisfactory	Outstanding	Outstanding
Illinois	Outstanding	Outstanding	High Satisfactory	Outstanding
Michigan	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Vermont	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Massachusetts	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Indiana	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

State of Ohio Full-Scope Area

Cleveland MSA #1680

Demographic Information for Full-Scope Area: Cleveland MSA #1680						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	714	15.13	20.45	39.64	23.53	1.26
Population by Geography	2,250,871	8.83	17.28	45.10	28.76	0.03
Owner-Occupied Housing by Geography	610,065	4.34	12.72	49.60	33.34	0.00
Businesses by Geography	119,898	7.30	14.85	42.16	34.89	0.80
Farms by Geography	3,316	1.45	5.70	54.89	37.85	0.12
Family Distribution by Income Level	590,866	20.05	17.93	22.25	39.77	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	224,410	16.25	25.58	43.14	15.03	0.00
Median Family Income	\$52,047			Median Housing Value	\$119,632	
HUD Adjusted Median Family Income for 2003	\$59,900			Unemployment Rate	6.0%	
Households Below the Poverty Level	10.63%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2003 HUD updated MFI.

The Cleveland AA consists of the entire Cleveland MSA, which is the largest MSA in Ohio. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

COB is headquartered in Cleveland, Ohio. In addition to the headquarters location, COB has 88 branches located within the Cleveland AA. As of June 30, 2003, 64.07 percent of COB's deposits within the state were derived from offices in this AA. During the evaluation period, 47 percent of the bank's HMDA and 58 percent of its small loans to businesses within the state were derived from this AA. COB is a retail bank with a primary focus on mortgage and consumer lending.

As of June 30, 2003, COB's deposits in the Cleveland AA totaled \$4.8 billion. Based on FDIC deposit market share data, COB was the third largest financial institution with respect to deposit market rank with 7.41 percent market share in the Cleveland AA. Competitors include KeyBank, National City, Bank One, and Fifth Third.

The unemployment rate rose from 3.9 percent in 2000 to 6.0 percent in 2003. The 2003 annual unemployment rate for Ohio was 6.2 percent and the annual national unemployment rate was 6.0 percent. The Cleveland MSA has experienced a net decline in the number of jobs, with the highest losses in the manufacturing sector. The major industries are education,

health and social services, and manufacturing. Major employers include Case Western Reserve University, Cleveland Clinic, American Greeting Corp., Ford Motor Co., and General Motors.

The city of Cleveland lost one-sixth of its population between 1980 and 2000. The Cleveland MSA also lost residents over this period. Most of the population loss took place in the central city and in the older inner-ring suburbs, which are now experiencing some of the physical decline (vacant and deteriorating residential and commercial buildings) that the inner city neighborhoods have experienced for decades.

Community contacts made during the evaluation period indicated that affordable housing, including affordable housing loans and financial literacy are significant credit needs for the Cleveland AA. The Cleveland AA had a reasonable number of community development lending, investment, and service opportunities based upon discussions with management and the community organizations contacted.

State of New York Full-Scope Area

Rochester MSA #6840

Demographic Information for Full-Scope Area: Rochester MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	268	14.18	17.54	45.15	21.27	1.87
Population by Geography	1,098,201	8.15	13.77	50.80	26.70	0.58
Owner-Occupied Housing by Geography	286,506	3.33	11.13	54.22	31.32	0.00
Businesses by Geography	62,260	10.18	14.83	45.93	28.97	0.09
Farms by Geography	2,664	1.20	5.33	71.02	22.41	0.04
Family Distribution by Income Level	279,711	19.46	18.23	22.98	39.32	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	105,438	14.99	19.55	50.76	14.71	0.00
Median Family Income	\$53,609					
HUD Adjusted Median Family Income for 2003	\$52,400					
Households Below the Poverty Level	10.04%					
				Median Housing Value	\$94,642	
				Unemployment Rate	5.7%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2003 HUD updated MFI.

The Rochester AA consists of the entire Rochester MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

COB has 34 branches located within the Rochester AA. As of June 30, 2003, 23.52 percent of COB's deposits within the state were derived from offices in this AA. During the evaluation period, 24 percent of the bank's HMDA and 21 percent of its small loans to businesses within the state were derived from this AA. COB is a retail bank with a primary focus on mortgage and consumer lending.

As of June 30, 2003, COB's deposits in the Rochester AA totaled \$1.8 billion. Based on FDIC deposit market share data, COB was the fifth largest financial institution with respect to deposit market rank with 7.79 percent market share in the Rochester AA. Competitors include Citibank, JPMorgan Chase, HSBC, and M&T Bank.

The unemployment rate rose from 3.6 percent in 2000 to 5.7 percent in 2003. The 2003 annual unemployment rate for New York was 6.4 percent and the annual national unemployment rate was 6.0 percent. The Rochester MSA experienced a net decline in the number of jobs, with the highest losses in the manufacturing sector due to downsizing at major employers. The layoffs at Kodak and Xerox also hurt the personal income growth for the AA as higher paying jobs in manufacturing were replaced by service industry jobs. The major industries are state and local government, education, and health and social services. Major employers include University of Rochester, Kodak, Wegmans Food Markets and Xerox.

Five of the counties in the MSA have been designated as Empire Zones by the State of New York. Empire Zones are designated redevelopment zones that offer special incentives to encourage economic development and job creation.

Community contacts made during the evaluation period indicated that affordable housing, including affordable housing loans and financial literacy are significant credit needs for the Rochester AA. The Rochester AA had a reasonable number of community development lending, investment, and service opportunities based upon discussions with management and the community organizations contacted.

State of Illinois Full-Scope Area

Chicago MSA #1600

Demographic Information for Full-Scope Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,837	13.17	24.99	34.68	26.24	0.93
Population by Geography	8,091,720	7.67	23.94	38.62	29.76	0.01
Owner-Occupied Housing by Geography	1,875,269	2.55	15.49	44.19	37.77	0.00
Businesses by Geography	383,533	3.24	13.61	37.90	44.97	0.27
Farms by Geography	6,260	0.93	7.38	47.78	43.85	0.06
Family Distribution by Income Level	1,983,657	20.78	17.53	22.07	39.62	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	759,920	14.05	34.34	37.56	14.05	0.00
Median Family Income	\$61,182					
HUD Adjusted Median Family Income for 2003	\$68,700					
Households Below the Poverty Level	9.67%					
				Median Housing Value	\$177,789	
				Unemployment Rate	6.9%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2003 HUD updated MFI.

The Chicago AA consists of six of the nine counties in the Chicago MSA. These counties are Cook, DuPage, Kane, Lake, McHenry and Will Counties. The city of Chicago is located in Cook County. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

COB has 117 branches located within the Chicago AA. As of June 30, 2003, 100 percent of COB's deposits within the state were derived from offices in this AA. During the evaluation period, 100 percent of the bank's HMDA and small loans to businesses within the state were derived from this AA. COB is a retail bank with a primary focus on mortgage and consumer lending.

As of June 30, 2003, COB's deposits in the Chicago AA totaled \$6.1 billion. Based on FDIC deposit market share data, COB was the seventh largest financial institution with respect to deposit market rank with 2.89 percent market share in the AA. Competitors include Bank One, LaSalle, Harris, and Northern Trust.

The unemployment rate rose from 4.5 percent in 2000 to 6.9 percent in 2003. The 2003 annual unemployment rate for Illinois was 6.7 percent and the annual national unemployment rate was 6.0 percent. The Chicago MSA is a primarily urban area and experienced population growth unlike other major metropolitan areas. The greatest growth has occurred in the suburban counties. Many areas in the city of Chicago and its inner ring suburbs, which are within the designated AA, are in need of investment to revitalize the area. State and local governments have developed a comprehensive redevelopment plan, which includes housing

and economic development. The major industries are state and local government, medical services and hospitals, and restaurants. Major employers include Jewel Osco, Advocate Health Care System, UPS and SBC Communications.

The Chicago AA has a high dependence on slow growing industries and housing affordability remains an issue. However, Chicago is a financial and transportation hub and the major business center for the Midwest, which provides some economic stability.

Community contacts made during the evaluation period indicated that affordable housing, including affordable housing loans, economic development and financial literacy are significant credit needs for the Chicago AA. The AA had a reasonable number of community development lending, investment, and service opportunities based upon discussions with management and the community organizations contacted.

State of Michigan Full-Scope Area

Detroit MSA #2160

Demographic Information for Full-Scope Area: Detroit MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,163	14.02	19.95	38.18	27.00	0.86
Population by Geography	4,043,467	10.97	20.43	39.48	29.07	0.06
Owner-Occupied Housing by Geography	1,108,065	5.86	16.54	44.02	33.59	0.00
Businesses by Geography	206,531	6.86	14.47	43.41	34.93	0.34
Farms by Geography	4,221	2.56	10.73	46.20	40.46	0.05
Family Distribution by Income Level	1,043,749	21.50	17.24	21.04	40.22	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	404,387	18.56	29.45	38.18	13.81	0.00
Median Family Income	\$59,205					
HUD Adjusted Median Family Income for 2003	\$66,700					
Households Below the Poverty Level	9.99%					
				Median Housing Value	\$134,069	
				Unemployment Rate	8.6%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2003 HUD updated MFI.

The Detroit AA consists of the Wayne, Macomb and Oakland Counties in the Detroit MSA. The city of Detroit is located in Wayne County. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

COB has 105 branches located within the Detroit AA. As of June 30, 2003, 93.74 percent of COB's deposits within the state were derived from offices in this AA. During the evaluation period, 78 percent of the bank's HMDA and 93 percent of its small loans to businesses within the state were derived from this AA. COB is a retail bank with a primary focus on mortgage and consumer lending.

As of June 30, 2003, COB's deposits in the Detroit AA totaled \$4.8 billion. Based on FDIC deposit market share data, COB was the fourth largest financial institution with respect to deposit market rank with 6.49 percent market share in the AA. Competitors include Comerica, Standard Federal, and Bank One.

The unemployment rate rose from 4.3 percent in 2000 to 8.6 percent in 2003. The 2003 annual unemployment rate for Michigan was 7.1 percent and the annual national unemployment rate was 6.0 percent. The Detroit MSA has experienced a net decline in the number of jobs, with the highest losses in the auto sectors. The major industries are auto manufacturing and parts, government. Major employers include Ford, Detroit Medical Center, DaimlerChrysler and General Motors.

The dependence on the auto industry and its recent downsizing and difficulties has hurt the AA. In addition, the area has suffered from declining populations and deteriorating housing stock in the central city and inner ring suburbs. Detroit now has less than one million residents for the first time since the 1920's. The city of Detroit has developed a comprehensive redevelopment plan and is home to one of the most successful federally designated Empowerment Zones, which has aided in job creation. However, job losses in the auto sector have not been fully offset by these new lower paying jobs.

Community contacts made during the evaluation period indicated that affordable housing, including affordable housing loans, economic development, and financial literacy are significant credit needs for the Detroit AA. The AA had a reasonable number of community development lending, investment, and service opportunities based upon discussions with management and the community organizations contacted.

State of Vermont Full-Scope Area

Non-metropolitan AA

Demographic Information for Full-Scope Area: Non-metropolitan Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	96	0.00	5.21	78.13	16.67	0.00
Population by Geography	296,041	0.00	6.79	77.19	16.01	0.00
Owner-Occupied Housing by Geography	84,285	0.00	4.86	77.66	17.48	0.00
Businesses by Geography	23,595	0.00	8.91	69.76	21.32	0.00
Farms by Geography	1,103	0.00	2.99	80.78	16.23	0.00
Family Distribution by Income Level	78,406	16.53	18.34	24.45	40.68	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	27,343	0.00	9.44	78.97	11.60	0.00
Median Family Income	\$46,103					
HUD Adjusted Median Family Income for 2003	\$52,800					
Households Below the Poverty Level	10.07%					
				Median Housing Value	\$109,835	
				Unemployment Rate	4.5%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2003 HUD updated MFI.

The Non-metropolitan AA consists of Addison, Bennington, Rutland, Washington, Windham and Windsor Counties. The counties are located in the southern half of the state, are contiguous, and the AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

COB has 19 branches located within the non-metropolitan AA. As of June 30, 2003, 70 percent of COB's deposits within the state were derived from offices in this AA. During the evaluation period, 62 percent of the bank's HMDA and 67 percent of its small loans to businesses within the state were derived from this AA. COB is a retail bank with a primary focus on mortgage and consumer lending.

As of June 30, 2003, COB's deposits in the non-metropolitan AA totaled \$665 million. Based on FDIC deposit market share data, COB was the third largest financial institution with respect to deposit market rank with 15.12 percent market share in the AA. Competitors include Chittenden Trust Company, BankNorth, and Merchants Bank.

The unemployment rate rose from 2.3 percent in 2000 to 4.4 percent in 2003. The 2003 annual unemployment rate for Vermont was 4.5 percent and the annual national unemployment rate was 6.0 percent. Although unemployment is low, the non-metropolitan AA has lost many of the higher paying manufacturing jobs and the replacement positions are lower paying service industry jobs.

The non-metropolitan AA is primary rural with the majority of the population residing in small towns. Major industries consist of retail trade, health care and manufacturing. A large portion of the economy is dependent upon tourism. Major employers include General Electric, State of Vermont and the Stratton Corporation.

Community contacts made during the evaluation period indicated that affordable housing, including affordable housing loans and financial literacy are significant credit needs for the non-metropolitan Vermont AA. The AA had a moderate number of community development lending, investment, and service opportunities based upon discussions with management and the community organizations contacted.

State of Massachusetts Full-Scope Area

Springfield MSA #8000

Demographic Information for Full-Scope Area: Springfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	122	13.93	16.39	41.80	27.05	0.82
Population by Geography	601,564	9.53	18.15	44.58	27.75	0.00
Owner-Occupied Housing by Geography	142,132	2.66	11.44	52.35	33.55	0.00
Businesses by Geography	31,241	13.70	17.07	41.86	27.36	0.00
Farms by Geography	837	1.43	7.29	46.48	44.80	0.00
Family Distribution by Income Level	148,287	21.71	16.97	21.77	39.56	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	57,350	17.19	23.84	43.36	15.61	0.00
Median Family Income	\$50,930					
HUD Adjusted Median Family Income for 2003	\$56,800					
Households Below the Poverty Level	13.21%					
				Median Housing Value	\$119,177	
				Unemployment Rate	5.7%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2003 HUD updated MFI.

The Springfield AA consists of the entire Springfield MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

COB has 10 branches located within the Springfield AA. As of June 30, 2003, 100 percent of COB's deposits within the state were derived from offices in this AA. During the evaluation period, 98 percent of the bank's HMDA and 100 percent of its small loans to businesses within the state were derived from this AA. COB is a retail bank with a primary focus on mortgage and consumer lending.

As of June 30, 2003, COB's deposits in the Springfield AA totaled \$417 million. Based on FDIC deposit market share data, COB was the ninth largest financial institution with respect to deposit market rank with 4.9 percent market share in the AA. Competitors include Fleet, BankNorth, and Peoples Saving Bank.

The unemployment rate rose from 2.9 percent in 2000 to 5.7 percent in 2003. The 2003 annual unemployment rate for Massachusetts was 5.8 percent and the annual national unemployment rate was 6.0 percent. The Springfield MSA has experienced a net decline in the number of jobs while population increased. The major industries are state and local government, health and social services, and restaurants. Major employers include Baystate Health Systems, Big Y Supermarkets and the University of Massachusetts.

The city of Springfield is an urban area located between Boston and New York. The recent economic recovery has slowed. The State of Massachusetts has designated selected

municipalities in the AA as Massachusetts Economic Targeted Areas (ETA). These ETAs consist of three or more contiguous census tracts that are economically distressed and meet defined criteria of economic need. Incentives are offered for investment and new business development in these areas.

Community contacts made during the evaluation period indicated that affordable housing, including affordable housing loans, economic development, and financial literacy are significant credit needs for the Springfield AA. The AA had a reasonable number of community development lending, investment, and service opportunities based upon discussions with management and the community organizations contacted.

State of Indiana Full-Scope Area

Indianapolis MSA #3480

Demographic Information for Full-Scope Area: Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	266	9.40	30.08	39.10	21.05	0.38
Population by Geography	1,248,785	5.52	25.17	41.62	27.69	0.00
Owner-Occupied Housing by Geography	323,494	3.48	20.02	43.94	32.56	0.00
Businesses by Geography	68,314	3.26	18.49	46.74	31.39	0.12
Farms by Geography	2,185	0.64	7.60	63.57	28.19	0.00
Family Distribution by Income Level	324,160	19.21	18.14	22.37	40.29	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	121,046	9.95	38.82	38.43	12.80	0.00
Median Family Income	\$55,191					
HUD Adjusted Median Family Income for 2003	\$62,900					
Households Below the Poverty Level	8.37%					
				Median Housing Value	\$109,924	
				Unemployment Rate	4.8%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2003 HUD updated MFI.

The Indianapolis AA consists of Boone, Hamilton, Hancock, Hendricks and Marion Counties in the Indianapolis MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

COB has 37 branches located within the Indianapolis AA. This is a new AA for COB and was created by de novo branching activities in 2003 and 2004. As of June 30, 2003, COB had no deposits in the AA. As of June 30, 2004, 90 percent of the deposits for the state were derived from branches within the AA. During the evaluation period, 90.7 percent of the bank's HMDA and 100 percent of its small loans to businesses within the state were derived from this AA. COB is a retail bank with a primary focus on mortgage and consumer lending. This is a competitive market for financial services and the difficulty for new entry in this market was considered.

As of June 30, 2004, COB's deposits in the Indianapolis AA totaled \$85 million. Based on FDIC deposit market share data, COB was the 39th largest financial institution with respect to deposit market rank with 0.36 percent market share in the AA. Competitors include Bank One, National City, and Fifth Third.

The unemployment rate rose from 2.4 percent in 2000 to 4.8 percent in 2003. The 2003 annual unemployment rate for Indiana was 5.3 percent and the annual national unemployment rate was 6.0 percent. The Indianapolis MSA has a diversified industrial structure, but also has a large exposure to one employer, Eli Lilly. The major industries are education, health and

social services, and pharmaceuticals. Major employers include Eli Lilly, Indiana University, Purdue University, and the Community Health Network.

The Indianapolis MSA and the city of Indianapolis have steadily gained population over the previous two decades. Most of the gains are taking place in suburban areas. The central city neighborhoods have lost population in the last ten years. The population loss in the urban core has led to increased vacancies and deterioration of the commercial and residential building stocks.

Community contacts made during the evaluation period indicated that affordable housing, including affordable housing loans and financial literacy are significant credit needs for the Indianapolis AA. The AA had a reasonable number of community development lending, investment, and service opportunities based upon discussions with management and the community organizations contacted.

Appendix D: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Home Mortgage Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Charter Number: 24340

Table 1. Lending Volume

LENDING VOLUME JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: OHIO								Evaluation Period:		
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
MSA 1680 Cleveland	49.07	10,709	1,270,289	364	64,099	0	0	11	22,062	11,086	1,365,874	64.07
Limited Review:												
MSA 0080 Akron	14.39	3,170	344,078	78	13,336	0	0	0	0	3,248	357,414	8.52
MSA 1320 Canton	11.15	2,460	214,980	57	7,514	0	0	0	0	2,517	222,494	9.73
MSA 8400 Toledo	12.93	2,857	289,761	61	6,030	0	0	7	21,037	2,925	316,828	12.04
MSA 9320 Youngstown	9.55	2,110	183,241	45	7,734	0	0	2	872	2,157	191,847	3.36
Ohio Non-MSA AAs	2.91	650	52,100	7	839	0	0	0	0	657	52,939	2.28

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 1, 2001 to August 30, 2004.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Period: JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: OHIO										Evaluation				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
MSA 1680 Cleveland	2,035	51.10	4.34	3.49	12.72	16.41	49.60	40.15	33.34	39.95	4.01	3.18	5.43	3.31	4.61	
Limited Review:																
MSA 0080 Akron	522	13.11	2.76	2.49	18.38	21.46	51.56	40.23	27.30	35.82	3.23	2.78	4.20	2.71	3.54	
MSA 1320 Canton MSA	362	9.09	1.00	0.28	14.85	18.23	63.33	59.94	20.82	21.55	4.94	3.13	6.67	4.81	4.34	
MSA 8400 Toledo	562	14.11	3.20	1.78	16.37	14.06	49.55	42.35	30.88	41.81	4.64	4.74	4.59	4.16	5.27	
MSA 9320 Youngstown	401	10.07	2.23	0.25	12.87	8.48	62.62	55.61	22.29	35.66	3.98	2.33	3.45	3.59	5.03	
Ohio Non-MSA AAs	100	2.51	0.44	0.00	31.36	38.00	63.91	57.00	4.29	5.00	5.16	0.00	6.90	4.56	3.79	

* Based on 2003 Peer Mortgage Data (Eastern)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Period: JANUARY 1, 2003 TO DECEMBER 31, 2003											Geography: OHIO					Evaluation				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp					
Full Review:																				
MSA 1680 Cleveland	8,654	48.21	4.34	2.20	12.72	8.09	49.60	39.68	33.34	50.03	7.02	6.31	6.27	5.98	8.36					
Limited Review:																				
MSA 0080 Akron	2,648	14.75	2.76	2.91	18.38	14.54	51.56	45.96	27.30	36.59	6.04	8.37	6.33	5.70	6.24					
MSA 1320 Canton	2,097	11.68	1.00	0.67	14.85	9.44	63.33	67.38	20.82	22.51	9.74	12.61	8.59	10.87	7.71					
MSA 8400 Toledo	2,294	12.78	3.20	1.13	16.37	12.86	49.55	44.38	30.88	41.63	7.79	6.70	8.90	7.61	7.72					
MSA 9320 Youngstown	1,709	9.52	2.23	0.41	12.87	4.21	62.62	60.56	22.29	34.82	6.70	4.19	3.48	6.64	7.75					
Ohio Non-MSA AAs	550	3.06	0.44	0.36	31.36	29.27	63.91	60.36	4.29	10.00	9.73	15.38	10.47	9.03	13.00					

* Based on 2003 Peer Mortgage Data (Eastern)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: OHIO										Evaluation Period:				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
MSA 1680 Cleveland	20	90.91	11.59	10.00	26.56	10.00	43.77	50.00	18.08	30.00	12.82	9.09	4.76	14.08	28.57	
Limited Review:																
MSA 0080 Akron	0	0.00	12.03	0.00	24.76	0.00	44.88	0.00	18.33	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 1320 Canton	1	4.55	6.14	0.00	16.17	0.00	48.81	100.00	28.88	0.00	4.76	0.00	0.00	7.69	0.00	
MSA 8400 Toledo	1	4.55	7.57	0.00	22.77	0.00	51.38	0.00	18.29	100.00	1.14	0.00	0.00	0.00	4.17	
MSA 9320 Youngstown	0	0.00	7.10	0.00	16.32	0.00	60.53	0.00	16.05	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA AAs	0	0.00	14.71	0.00	38.00	0.00	41.52	0.00	5.77	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Period: JANUARY 1, 2003 TO DECEMBER 31, 2003												Geography: OHIO					Evaluation				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
MSA 1680 Cleveland	362	59.34	7.30	4.70	14.85	14.64	42.16	35.36	34.89	45.30	0.70	0.61	0.80	0.60	0.84						
Limited Review:																					
MSA 0080 Akron	78	12.79	9.28	8.97	14.73	16.67	43.19	34.62	32.79	39.74	0.47	0.53	0.65	0.37	0.56						
MSA 1320 Canton	57	9.34	4.30	7.02	15.93	19.30	55.17	52.63	24.59	21.05	0.71	1.38	1.16	0.71	0.55						
MSA 8400 Toledo	61	10.00	5.28	3.28	14.40	21.31	47.57	50.82	32.74	24.59	0.47	0.44	0.81	0.53	0.32						
MSA 9320 Youngstown	45	7.38	4.30	0.00	15.44	8.89	55.35	57.78	24.67	33.33	0.36	0.00	0.26	0.39	0.44						
Ohio Non-MSA AAs	7	1.15	6.82	28.57	27.27	14.29	61.61	57.14	4.30	0.00	0.20	1.28	0.12	0.18	0.00						

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: OHIO								Evaluation Period:				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 1680 Cleveland	2,035	51.10	20.05	11.27	17.93	26.26	22.25	26.51	39.77	35.97	4.63	5.01	4.34	4.33	5.02
Limited Review:															
MSA 0080 Akron	522	13.11	18.96	14.54	18.42	32.42	23.14	23.77	39.48	29.27	3.72	4.32	4.40	3.21	3.34
MSA 1320 Canton	362	9.09	17.30	15.00	19.12	31.39	23.85	29.44	39.73	24.17	5.69	7.80	6.79	5.68	4.13
MSA 8400 Toledo	562	14.11	21.09	13.85	17.58	24.10	22.03	27.88	39.30	34.17	5.11	6.26	4.67	5.06	5.12
MSA 9320 Youngstown	401	10.07	18.79	8.56	18.76	22.42	22.61	30.48	39.84	38.54	4.59	3.65	3.75	4.87	5.36
Ohio Non-MSA AAs	100	2.51	23.76	13.13	21.80	29.29	23.24	25.25	31.20	32.32	5.48	4.32	5.69	4.76	6.82

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Period: JANUARY 1, 2003 TO DECEMBER 31, 2003											Geography: OHIO					Evaluation				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share By Borrower Distribution									
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp					
Full Review:																				
MSA 1680 Cleveland	8,654	48.21	20.05	8.57	17.93	20.09	22.25	28.32	39.77	43.03	8.26	8.45	7.59	8.30	8.54					
Limited Review:																				
MSA 0080 Akron	2,648	14.75	18.96	10.25	18.42	23.35	23.14	28.92	39.48	37.48	7.09	6.71	7.32	7.43	6.82					
MSA 1320 Canton	2,097	11.68	17.30	10.57	19.12	23.60	23.85	29.39	39.73	36.44	11.32	12.62	12.24	11.57	10.33					
MSA 8400 Toledo	2,294	12.78	21.09	11.81	17.58	21.70	22.03	28.55	39.30	37.94	8.76	12.40	9.50	8.90	7.63					
MSA 9320 Youngstown	1,709	9.52	18.79	6.91	18.76	20.60	22.61	27.80	39.84	44.69	7.56	6.44	7.37	7.29	8.06					
Ohio Non-MSA AAs	550	3.06	23.76	10.38	21.80	18.94	23.24	30.42	31.20	40.26	10.85	10.61	8.75	10.65	12.51					

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003					Geography: OHIO			Evaluation Period:	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
MSA 1680 Cleveland	364	59.48	64.41	98.08	53.85	23.35	22.80	0.70	2.23
Limited Review:									
MSA 0080 Akron	78	12.75	64.35	98.72	50.00	30.77	19.23	0.47	1.63
MSA 1320 Canton	57	9.31	65.61	100.00	64.91	22.81	12.28	0.71	2.46
MSA 8400 Toledo	61	9.97	61.88	98.36	72.13	21.31	6.56	0.47	1.32
MSA 9320 Youngstown	45	7.35	65.27	97.78	62.22	17.78	20.00	0.36	1.12
Ohio Non-MSA AAs	7	1.14	67.02	71.43	85.71	0.00	14.29	0.20	0.38

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.16% of small loans to businesses originated and purchased by the bank.

Charter Number: 24340

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Period: APRIL 1, 2001 TO AUGUST 30, 2004		Geography: OHIO						Evaluation	
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MSA 1680 Cleveland	2	387	123	8,303	125	8,690	54.88	0	0
Limited Review:									
MSA 0080 Akron	0	0	3	1,533	3	1,533	9.68	0	0
MSA 1320 Canton	0	0	7	188	7	188	1.19	0	0
MSA 8400 Toledo	0	0	13	2,271	13	2,271	14.34	0	0
MSA 9320 Youngstown	0	0	2	303	2	303	1.91	0	0
Ohio Non—MSA AAs	0	0	2	400	2	400	2.53	0	0
Statewide/Regional	1	1,946	3	503	4	2,449	15.47	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Charter Number: 24340

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: OHIO				Evaluation			
Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MSA 1680 Cleveland	64.07	77	55.80	7.79	9.09	51.95	31.17	22	0	+1	+4	+10	+7	8.83	17.29	45.11	28.77
Limited Review:																	
MSA 0080 Akron	8.52	20	14.49	10.00	15.00	45.00	30.00	3	0	0	+1	+2	0	6.29	21.45	48.11	24.15
MSA 1320 Canton	9.73	12	8.69	8.33	16.67	50.00	25.00	0	0	0	0	0	0	2.03	17.52	60.40	20.05
MSA 8400 Toledo	12.04	19	13.77	0.00	10.53	68.42	21.05	0	0	0	0	0	0	7.02	20.24	45.82	26.92
MSA 9320 Youngstown	3.36	6	4.35	0.00	0.00	66.77	33.33	1	0	0	0	+1	0	3.74	16.08	60.16	20.02
Ohio Non-MSA AAs	2.28	4	2.90	25.00	0.00	50.00	25.00	0	0	0	0	0	0	1.55	32.66	61.49	4.30

Charter Number: 24340

Table 1. Lending Volume

LENDING VOLUME JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: NEW YORK								Evaluation Period:		
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
MSA 6840 Rochester	22.87	4,685	469,982	198	30,414	0	0	3	6,956	4,886	507,352	23.52
Limited Review:												
MSA 0160 Albany	22.19	4,528	515,811	210	37,429	0	0	1	11,100	4,739	564,340	21.64
MSA 0960 Binghamton	1.54	270	19,007	58	6,876	0	0	0	0	328	25,883	2.73
MSA 1280 Buffalo	23.18	4,701	423,332	247	39,902	0	0	0	0	4,948	463,234	17.22
MSA 2281 Dutchess Co	3.29	676	126,328	27	2,855	0	0	0	0	703	129,183	4.95
MSA 2335 Elmira	0.01	2	250	0	0	0	0	0	0	2	250	.05
MSA 2975 Glen Falls	3.25	655	64,882	39	4,399	0	0	0	0	694	69,281	2.63
MSA 3610 Jamestown	0.06	11	405	1	119	0	0	0	0	12	524	.02
MSA 5600 New York	1.52	307	63,375	17	2,366	0	0	1	1,000	325	66,741	3.40
MSA 5660 Newburgh	3.40	681	94,812	45	3,946	0	0	0	0	726	98,758	5.47
MSA 8160 Syracuse	5.37	1,073	115,737	74	18,196	0	0	1	6,750	1,148	140,693	2.75
MSA 8680 Utica	2.49	514	35,754	17	2,246	0	0	0	0	531	38,000	2.70
MSA 5600 Westchester Co	0.03	6	5,560	0	0	0	0	0	0	6	5,560	0.00
New York non-MSA AAs	10.81	2,141	190,533	167	21,489	0	0	2	13,429	2,310	225,451	12.92

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2001 to August 30, 2004.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: NEW YORK									Evaluation Period:				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 6840 Rochester	1,526	26.65	3.33	3.67	11.13	11.14	54.22	39.84	31.32	45.35	7.14	8.74	5.98	5.67	9.67
Limited Review:															
MSA 0160 Albany	1,373	23.97	2.48	2.48	14.05	13.33	52.55	43.12	30.91	41.08	6.95	4.53	6.13	5.93	9.35
MSA 0960 Binghampton	15	0.26	0.97	0.00	9.07	33.33	61.79	46.67	28.17	20.00	0.50	0.00	1.58	0.40	0.32
MSA 1280 Buffalo	1,391	24.29	4.34	2.44	13.17	11.79	51.87	34.94	30.61	50.83	6.86	8.54	7.09	4.82	9.43
MSA 2281 Dutchess Co	164	2.86	1.59	1.22	8.68	10.37	67.54	54.88	22.20	33.54	2.90	1.01	2.77	2.51	4.36
MSA 2335 Elmira	1	0.02	1.15	0.00	25.16	0.00	53.16	0.00	20.53	100.00	0.20	0.00	0.00	0.00	0.77
MSA 2975 Glen Falls	191	3.34	0.00	0.00	7.87	7.33	76.58	51.31	15.56	41.36	8.06	0.00	6.54	5.81	16.88
MSA 3610 Jamestown	5	0.09	4.31	20.00	27.89	20.00	67.80	60.00	0.00	0.00	1.35	7.69	1.19	1.10	0.00
MSA 5600 New York	61	1.07	0.64	0.00	0.18	0.00	6.09	6.56	93.09	93.44	0.72	0.00	0.00	0.47	0.76
MSA 5660 Newburgh	156	2.72	2.49	6.41	7.45	11.54	56.89	53.85	33.17	28.21	1.91	2.70	2.06	1.85	1.85
MSA 8160 Syracuse	392	6.84	2.33	2.55	11.05	11.22	54.21	34.95	32.41	51.28	3.22	3.55	3.47	2.29	4.34
MSA 8680 Utica	52	0.91	2.64	7.69	9.37	21.15	65.33	51.92	22.66	19.23	1.31	4.49	2.47	1.13	0.95
MSA 5600 Westchester Co	0	0.00	0.00	0.00	0.80	0.00	21.85	0.00	77.35	0.00	0.00	0.00	0.00	0.00	0.00
New York non-MSA AAs	400	6.98	0.00	0.00	5.73	3.00	73.63	78.50	20.65	18.50	4.05	0.00	2.03	4.54	3.12

* Based on 2003 Peer Mortgage Data (Eastern)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003												Geography: NEW YORK					Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp						
Full Review:																					
MSA 6840 Rochester	3,151	21.76	3.33	1.84	11.13	8.22	54.22	45.32	31.32	44.62	7.88	9.73	8.43	7.26	8.43						
Limited Review:																					
MSA 0160 Albany	3,152	21.77	2.48	1.65	14.05	9.49	52.55	44.48	30.91	44.38	8.40	8.19	8.58	7.36	9.73						
MSA 0960 Binghamton	254	1.75	0.97	0.79	9.07	10.63	61.79	48.03	28.17	40.55	4.07	5.13	6.03	3.64	4.30						
MSA 1280 Buffalo	3,302	22.81	4.34	1.18	13.17	8.15	51.87	48.24	30.61	42.43	10.53	7.28	10.68	10.07	11.23						
MSA 2281 Dutchess Co	511	3.53	1.59	1.17	8.68	9.39	67.54	63.21	22.20	26.22	3.05	1.86	3.49	3.00	3.13						
MSA 2335 Elmira	1	0.01	1.15	0.00	25.16	0.00	53.16	0.00	20.53	100.00	0.12	0.00	0.00	0.00	0.42						
MSA 2975 Glen Falls	464	3.20	0.00	0.00	7.87	6.68	76.58	68.97	15.56	24.35	10.34	0.00	11.11	10.04	11.05						
MSA 3610 Jamestown	6	0.04	4.31	16.67	27.89	33.33	67.80	50.00	0.00	0.00	1.25	3.57	1.60	0.92	0.00						
MSA 5600 New York	246	1.70	0.64	2.44	0.18	0.41	6.09	4.47	93.09	92.68	0.95	3.57	1.54	0.72	0.95						
MSA 5660 Newburgh	525	3.63	2.49	2.86	7.45	8.95	56.89	60.95	33.17	27.24	2.67	3.11	4.44	3.03	1.90						
MSA 8160 Syracuse	661	4.57	2.33	1.36	11.05	7.56	54.21	46.75	32.41	44.33	3.31	3.63	3.44	3.22	3.37						
MSA 8680 Utica	460	3.18	2.64	2.39	9.37	11.30	65.33	57.39	22.66	28.91	6.38	13.58	11.53	5.95	5.94						
MSA 5600 Westchester Co	5	0.03	0.00	0.00	0.80	0.00	21.85	20.00	77.35	80.00	0.20	0.00	0.00	0.18	0.20						
New York non-MSA AAs	1,741	12.02	0.00	0.00	5.73	3.45	73.63	76.57	20.65	19.99	8.45	0.00	6.95	9.80	5.68						

* Based on 2003 Peer Mortgage Data (Eastern)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Period: JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: NEW YORK										Evaluation				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
MSA 6840 Rochester	8	18.18	15.50	12.50	19.58	37.50	43.45	12.50	21.47	37.50	9.64	16.67	20.00	2.22	17.65	
Limited Review:																
MSA 0160 Albany	3	6.82	17.64	33.33	16.26	0.00	47.10	0.00	19.00	66.67	3.57	7.69	0.00	0.00	20.00	
MSA 0960 Binghamton	1	2.27	17.36	0.00	37.04	0.00	30.23	100.00	15.37	0.00	2.94	0.00	0.00	5.56	0.00	
MSA 1280 Buffalo	8	18.18	18.07	0.00	14.71	0.00	43.80	100.00	23.42	0.00	8.33	0.00	0.00	16.00	0.00	
MSA 2281 Dutchess Co	1	2.27	16.10	0.00	24.17	100.00	57.69	0.00	2.04	0.00	5.56	0.00	14.29	0.00	0.00	
MSA 2335 Elmira	0	0.00	31.77	0.00	39.98	0.00	22.43	0.00	5.81	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 2975 Glen Falls	0	0.00	0.00	0.00	29.96	0.00	38.04	0.00	32.00	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 3610 Jamestown	0	0.00	45.40	0.00	23.16	0.00	31.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 5600 New York	0	0.00	2.29	0.00	0.61	0.00	32.82	0.00	64.28	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 5660 Newburgh	0	0.00	15.19	0.00	22.79	0.00	48.78	0.00	13.24	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 8160 Syracuse	20	45.45	26.31	15.00	22.96	20.00	33.96	45.00	16.77	20.00	27.03	21.43	21.05	32.14	30.77	
MSA 8680 Utica	2	4.55	22.57	0.00	25.82	0.00	38.62	50.00	12.99	50.00	7.69	0.00	0.00	9.09	16.67	
MSA 5600 Westchester Co	1	2.27	0.00	0.00	10.94	0.00	38.53	100.00	50.54	0.00	7.69	0.00	0.00	25.00	0.00	
New York non-MSA AAs	0	0.00	0.00	0.00	18.69	0.00	62.32	0.00	18.99	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Period: JANUARY 1, 2003 TO DECEMBER 31, 2003												Geography: NEW YORK					Evaluation	
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
MSA 6840 Rochester	198	18.07	10.18	8.59	14.83	16.67	45.93	41.92	28.97	32.83	0.76	0.88	0.99	0.69	0.83			
Limited Review:																		
MSA 0160 Albany	210	19.16	13.86	10.95	14.13	11.90	45.13	53.81	26.87	23.33	1.03	1.50	0.93	1.17	0.87			
MSA 0960 Binghamton	58	5.29	11.21	17.24	17.88	8.62	50.31	50.00	20.60	24.14	0.99	1.68	0.51	1.07	1.10			
MSA 1280 Buffalo	243	22.17	9.64	6.17	13.44	8.64	44.56	47.74	29.76	37.45	1.11	0.94	0.76	1.17	1.29			
MSA 2281 Dutchess Co	27	2.46	9.07	0.00	13.70	18.52	59.67	62.96	17.53	18.52	0.35	0.00	0.59	0.38	0.36			
MSA 2335 Elmira	0	0.00	27.46	0.00	36.20	0.00	29.13	0.00	7.12	0.00	0.00	0.00	0.00	0.00	0.00			
MSA 2975 Glen Falls	39	3.56	0.00	0.00	13.66	7.69	66.61	76.92	19.72	15.38	0.98	0.00	0.69	1.19	0.76			
MSA 3610 Jamestown	1	0.09	38.43	0.00	36.31	100.00	25.27	0.00	0.00	0.00	0.10	0.00	0.35	0.00	0.00			
MSA 5600 New York	17	1.55	1.87	29.41	0.34	0.00	11.46	11.76	86.33	58.82	0.12	1.46	0.00	0.15	0.09			
MSA 5660 Newburgh	45	4.11	6.67	11.11	12.54	20.00	57.25	55.56	23.54	13.33	0.49	0.93	1.02	0.54	0.25			
MSA 8160 Syracuse	74	6.75	14.03	14.86	12.05	10.81	47.29	55.41	26.62	18.92	0.48	0.60	0.49	0.56	0.37			
MSA 8680 Utica	17	1.55	11.86	11.76	13.34	5.88	54.16	58.82	20.62	23.53	0.29	0.38	0.13	0.32	0.34			
MSA 5600 Westchester Co	0	0.00	0.00	0.00	27.71	0.00	31.79	0.00	40.49	0.00	0.00	0.00	0.00	0.00	0.00			
New York non-MSA AAs	167	15.24	0.00	0.00	9.21	4.79	68.27	85.63	22.45	9.58	0.76	0.00	0.49	1.06	0.34			

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: NEW YORK										Evaluation Period:				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
MSA 8640 Rochester	1,526	26.65	19.46	11.52	18.23	22.44	22.98	23.49	39.32	42.55	8.48	9.00	7.02	7.27	10.41	
Limited Review:																
MSA 0160 Albany	1,373	23.97	19.30	6.02	18.57	17.69	22.95	24.01	39.18	52.28	8.22	6.47	5.72	6.75	11.40	
MSA 0960 Binghamton	15	0.26	18.65	33.33	18.96	40.00	23.18	6.67	39.20	20.00	0.59	2.08	0.96	0.15	0.30	
MSA 1280 Buffalo	1,391	24.29	20.32	10.26	18.04	18.86	22.06	24.49	39.58	46.39	8.65	9.34	6.73	7.19	10.90	
MSA 2281 Dutchess Co	164	2.86	17.74	4.27	18.33	11.59	24.92	28.66	39.01	55.49	3.53	3.89	2.17	3.18	4.30	
MSA 2335 Elmira	1	0.02	25.56	0.00	19.93	0.00	21.85	100.00	32.66	0.00	0.23	0.00	0.00	0.73	0.00	
MSA 2975 Glen Falls	191	3.34	17.50	2.11	19.41	12.63	24.45	33.16	38.65	52.11	9.46	3.15	5.63	11.23	11.07	
MSA 3610 Jamestown	5	0.09	28.71	50.00	19.97	50.00	21.05	0.00	30.26	0.00	1.46	4.76	2.60	0.00	0.00	
MSA 5600 New York	61	1.07	9.31	0.00	8.56	1.64	13.40	18.03	68.73	80.33	0.90	0.00	0.39	1.10	0.90	
MSA 5660 Newburgh	156	2.72	18.99	7.05	16.92	21.79	22.99	26.28	41.09	44.87	2.29	4.72	2.86	1.93	2.14	
MSA 8160 Syracuse	392	6.84	19.88	4.59	18.03	22.19	21.68	24.74	40.41	48.47	3.87	2.13	3.49	3.50	4.73	
MSA 8680 Utica	52	0.91	19.84	26.92	18.15	25.00	23.04	7.69	38.97	40.38	1.55	4.46	1.32	0.45	1.82	
MSA 5600 Westchester Co	0	0.00	13.23	0.00	11.08	0.00	13.59	0.00	62.10	0.00	0.00	0.00	0.00	0.00	0.00	
New York non-MSA AAs	400	6.98	18.10	2.01	17.77	15.29	22.00	23.06	42.13	59.65	4.74	2.25	4.39	4.26	5.27	

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Period: JANUARY 1, 2003 TO DECEMBER 31, 2003											Geography: NEW YORK					Evaluation				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share By Borrower Income*									
	#	% of Total** % of Total*	% Families** % Families*	% BANK Loans*** % BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp					
Full Review:																				
MSA 6840 Rochester	3,151	21.76	19.46	8.01	18.23	21.00	22.98	28.85	39.32	42.14	8.91	11.10	9.65	9.13	8.15					
Limited Review:																				
MSA 0160 Albany	3,152	21.77	19.30	4.12	18.57	16.80	22.95	26.68	39.18	52.40	10.21	8.71	9.30	9.49	11.13					
MSA 0960 Binghamton	254	1.75	18.65	7.54	18.96	12.70	23.18	27.78	39.20	51.98	4.57	5.90	3.75	5.15	4.39					
MSA 1280 Buffalo	3,302	22.81	20.32	5.65	18.04	18.60	22.06	28.73	39.58	47.02	12.54	12.81	13.95	12.39	12.12					
MSA 2281 Dutchess Co	511	3.53	17.74	4.52	18.33	22.59	24.92	30.26	39.01	42.63	3.61	3.76	4.37	3.43	3.42					
MSA 2335 Elmira	1	0.01	25.56	0.00	19.93	0.00	21.85	0.00	32.66	100.00	0.14	0.00	0.00	0.00	0.28					
MSA 2975 Glen Falls	464	3.20	17.50	3.92	19.41	14.16	24.45	25.71	38.65	56.21	11.67	10.59	9.98	11.69	12.27					
MSA 3610 Jamestown	6	0.04	28.71	33.33	19.97	0.00	21.05	50.00	30.26	16.67	1.53	5.41	0.00	2.42	0.63					
MSA 5600 New York	246	1.70	9.31	1.23	8.56	6.97	13.40	17.21	68.73	74.59	1.15	2.34	2.20	1.36	1.06					
MSA 5660 Newburgh	525	3.63	18.99	4.03	16.92	16.31	22.99	28.21	41.09	51.44	3.17	4.12	3.48	2.89	3.18					
MSA 8160 Syracuse	661	4.57	19.88	4.67	18.03	14.00	21.68	31.42	40.41	49.92	3.91	3.95	3.30	4.57	3.75					
MSA 8680 Utica	460	3.18	19.84	5.46	18.15	21.62	23.04	29.91	38.97	43.01	7.11	8.47	8.66	7.64	6.14					
MSA 5600 Westchester Co	5	0.03	13.23	0.00	11.08	0.00	13.59	0.00	62.10	100.00	0.25	0.00	0.00	0.00	0.31					
New York non-MSA AAs	1,741	12.02	18.10	3.70	17.77	11.72	22.00	25.12	42.13	59.47	9.91	11.21	9.12	9.83	10.03					

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Geography: NEW YORK			Evaluation	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
MSA 6840 Rochester	198	18.00	64.64	94.44	59.60	22.73	17.68	0.76	1.89
Limited Review:									
MSA 0160 Albany	210	19.09	62.22	96.67	53.33	23.33	23.33	1.03	2.86
MSA 0960 Binghampton	58	5.27	63.29	98.28	74.14	13.79	12.07	0.99	3.20
MSA 1280 Buffalo	247	22.45	62.31	95.55	57.09	24.29	18.62	1.11	3.14
MSA 2281 Dutchess Co	27	2.45	67.06	100.00	70.37	18.52	11.11	0.35	1.01
MSA 2335 Elmira	0	0.00	60.60	0.00	0.00	0.00	0.00	0.00	0.00
MSA 2975 Glen Falls	39	3.55	64.28	97.44	71.79	15.38	12.82	0.98	2.60
MSA 3610 Jamestown	1	0.09	61.46	100.00	0.00	100.00	0.00	0.10	0.29
MSA 5600 New York	17	1.55	65.98	100.00	70.59	17.65	11.76	0.12	0.33
MSA 5660 Newburgh	45	4.09	65.80	93.33	71.11	22.22	6.67	0.49	1.32
MSA 8160 Syracuse	74	6.73	63.28	98.65	37.84	35.14	27.03	0.48	1.31
MSA 8680 Utica	17	1.55	63.74	82.35	76.47	5.88	17.65	0.29	0.62
MSA 5600 Westchester Co	0	0.00	62.63	0.00	0.00	0.00	0.00	0.00	0.00
New York non-MSA AAs	167	15.18	65.53	92.81	67.66	19.16	13.17	0.76	1.90

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.55% of small loans to businesses originated and purchased by the bank.

Charter Number: 24340

Table 14. Qualified Investments

QUALIFIED INVESTMENTS AUGUST 30, 2004		Geography: NEW YORK				Evaluation Period: APRIL 1, 2001 TO			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MSA 6840 Rochester	1	192	32	879	33	1,071	7.12	0	0
Limited Review:									
MSA 0160 Albany	0	0	23	2,419	23	2,419	16.08	0	0
MSA 0960 Binghamton	0	0	4	41	4	41	.27	0	0
MSA 1280 Buffalo	0	0	12	98	12	98	.65	0	0
MSA 2281 Dutchess Co	0	0	2	299	2	299	1.99	0	0
MSA 2335 Elmira	0	0	0	0	0	0	0.00	0	0
MSA 2975 Glen Falls	0	0	0	0	0	0	0.00	0	0
MSA 3610 Jamestown	0	0	0	0	0	0	0.00	0	0
MSA 5600 New York	1	532	3	269	4	801	5.33	0	0
MSA 5660 Newburgh	0	0	6	987	6	987	6.56	0	0
MSA 8160 Syracuse	0	0	3	54	3	54	.36	0	0
MSA 8680 Utica	0	0	1	3	1	3	.02	0	0
MSA 5600 Westchester Co	0	0	0	0	0	0	0.00	0	0
New York non-MSA AAs	0	0	2	221	2	221	1.47	0	0
Statewide/Regional	1	9,048	0	0	1	9,048	60.15	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: NEW YORK							
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MSA 6840 Rochester	23.52	34	18.89	11.76	14.71	38.24	35.29	13	0	+2	+3	+5	+3	8.15	13.77	50.80	26.70
Limited Review:																	
MSA 0160 Albany	21.64	24	13.33	20.83	4.17	25.00	50.00	2	0	0	0	0	+2	6.49	17.37	49.59	26.39
MSA 0960 Binghamton	2.73	10	5.56	20.00	30.00	20.00	30.00	1	0	0	+1	0	0	2.83	14.70	56.37	26.10
MSA 1280 Buffalo	17.22	39	21.66	5.13	12.82	43.59	38.46	21	0	+1	+4	+8	+8	8.78	16.45	47.62	26.35
MSA 2281 Dutchess Co	4.95	7	3.89	0.00	14.29	85.71	0.00	0	0	0	0	0	0	4.86	12.13	64.73	18.19
MSA 2335 Elmira	.05	1	.56	0.00	0.00	0.00	100.00	1	0	0	0	0	+1	6.28	32.99	44.21	12.23
MSA 2975 Glen Falls	2.63	6	3.33	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	10.39	74.77	14.84
MSA 3610 Jamestown	.02	1	.56	0.00	100.00	0.00	0.00	1	0	0	+1	0	0	11.62	31.57	56.81	0.00
MSA 5600 New York	3.40	3	1.66	0.00	0.00	66.67	33.33	0	0	0	0	0	0	2.65	0.75	13.08	83.51
MSA 5660 Newburgh	5.47	7	3.89	0.00	42.86	57.14	0.00	0	0	0	0	0	0	9.09	11.56	52.36	26.99
MSA 8160 Syracuse	2.75	10	5.56	0.00	0.00	60.00	40.00	4	0	0	0	+2	+2	8.20	14.73	48.30	28.77
MSA 8680 Utica	2.70	6	3.33	16.67	33.33	50.00	0.00	2	0	0	+2	0	0	5.95	13.31	60.65	20.07
MSA 5600 Westchester Co	0.00	1	.56	0.00	100.00	0.00	0.00	1	0	0	+1	0	0	0.00	5.43	32.16	62.41
New York non-MSA AAs	12.92	31	17.22	0.00	6.45	80.65	12.90	6	0	0	+2	+3	+1	0.00	7.97	69.99	21.20

Charter Number: 24340

Table 1. Lending Volume

LENDING VOLUME 2003 TO DECEMBER 31, 2003		Geography: ILLINOIS								Evaluation Period: JANUARY 1,		
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
MSA 1600 Chicago	100.00	11,998	2,128,097	407	68,591	0	0	24	17,286	12,431	2,216,954	100.00

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2001 to August 30, 2004.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Charter Number: 24340

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 1, 2003 TO DECEMBER 31, 2003		Geography: ILLINOIS								Evaluation Period: JANUARY					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 1600 Chicago	2,058	100.00	2.55	5.25	15.49	21.04	44.19	27.41	37.77	46.31	0.83	1.31	1.15	0.53	0.98

* Based on 2003 Peer Mortgage Data (Western)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Charter Number: 24340

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: ILLINOIS								Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 1600 Chicago	9,825	100.00	2.55	2.97	15.49	17.92	44.19	35.40	37.77	43.70	1.24	2.11	1.97	1.12	1.13

* Based on 2003 Peer Mortgage Data (Western)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Charter Number: 24340

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: ILLINOIS									Evaluation Period:				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 1305 Chicago	108	100.0 0	11.52	23.15	24.90	49.07	35.99	19.44	27.59	8.33	2.11	3.65	2.70	1.20	1.23

* Based on 2003 Peer Mortgage Data (Western)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Charter Number: 24340

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: ILLINOIS								Evaluation Period:				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 1600 Chicago	404	100.00	3.24	7.18	13.61	21.04	37.90	39.85	44.97	31.93	0.20	0.64	0.35	0.21	0.14

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Charter Number: 24340

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: ILLINOIS									Evaluation Period:				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 1600 Chicago	2,062	100.00	20.78	10.01	17.53	23.66	22.07	26.26	39.62	40.06	1.00	1.32	0.96	0.86	1.09

* Based on 2003 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: ILLINOIS									Evaluation Period:						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Borrower Income*						
	#	% of Total**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
Full Review:																	
MSA 1600 Chicago	9,828	100.00	20.78	10.32	17.53	21.76	22.07	27.77	39.62	40.16	1.57	2.64	1.81	1.52	1.36		

* Based on 2003 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003				Geography: ILLINOIS			Evaluation Period:		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
MSA 1600 Chicago	407	100.00	63.32	96.81	58.48	19.16	22.36	0.20	0.61

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.49% of small loans to businesses originated and purchased by the bank.

Charter Number: 24340

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Period: APRIL 1, 2001 TO AUGUST 30, 2004		Geography: ILLINOIS						Evaluation	
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MSA 1600 Chicago	6	2,115	106	46,343	112	48,458	100.00	0	0
Statewide/Regional	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Charter Number: 24340

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: ILLINOIS							
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MSA 1600 Chicago	100.00	105	100.00	3.81	10.48	53.33	32.38	13	0	+1	+1	+5	+6	7.67	23.94	38.62	29.76

Charter Number: 24340

Table 1. Lending Volume

LENDING VOLUME TO DECEMBER 31, 2003		Geography: MICHIGAN								Evaluation Period: JANUARY 1, 2003		
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
MSA 2160 Detroit	76.87	15,960	2,373,801	425	66,838	0	0	15	83,478	16,400	2,524,117	93.74
Limited Review:												
MSA 0440 Ann Arbor	5.91	1,251	289,236	9	2,012	0	0	0	0	1,260	291,248	1.51
MSA 3000 Grand Rapids	4.98	1,056	139,085	5	145	0	0	0	0	1,061	139,230	.29
MSA 3720 Kalamazoo	5.75	1,222	172,761	4	677	0	0	0	0	1,226	173,438	1.64
MSA 4040 Lansing	4.56	963	145,106	8	1,531	0	0	0	0	971	146,637	.52
MSA 6960 Saginaw	0.47	101	9,379	0	0	0	0	0	0	101	9,379	.66
Michigan non-MSA AAs	1.45	307	29,863	3	127	0	0	0	0	310	29,990	1.64

^{*} Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from April 1, 2001 to August 30, 2004.

^{***} Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: MICHIGAN									Evaluation Period:				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 2160 Detroit	2,329	71.68	5.86	8.63	16.54	22.37	44.02	29.41	33.59	39.59	2.20	4.20	2.91	1.49	2.47
Limited Review:															
MSA 0440 Ann Arbor	209	6.43	1.26	1.44	9.62	10.53	57.94	48.33	31.18	39.71	1.43	0.95	1.45	1.15	2.05
MSA 3000 Grand Rapids	221	6.80	1.38	3.62	12.47	18.55	62.10	47.96	24.05	29.86	1.11	1.90	1.39	0.94	1.26
MSA 3720 Kalamazoo	250	7.69	0.31	0.80	15.94	13.60	56.41	44.80	27.34	40.80	3.24	11.76	2.99	2.73	4.16
MSA 4040 Lansing	205	6.31	3.02	8.29	20.45	33.66	48.16	24.88	28.36	33.17	2.94	4.90	3.93	1.60	4.04
MSA 6960 Saginaw	16	0.49	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	3.17	0.00	0.00	3.17	0.00
Michigan non-MSA AAs	19	0.58	0.00	0.00	5.46	26.32	44.56	21.05	49.98	52.63	1.15	0.00	3.65	0.55	1.27

* Based on 2003 Peer Mortgage Data (Eastern)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: MICHIGAN								Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 2160 Detroit	13,608	77.39	5.86	3.95	16.54	13.92	44.02	36.56	33.59	45.58	3.09	5.35	4.15	2.87	2.95
Limited Review:															
MSA 0440 Ann Arbor	1,040	5.91	1.26	1.63	9.62	9.04	57.94	44.90	31.18	44.42	1.53	2.33	2.21	1.22	1.85
MSA 3000 Grand Rapids	834	4.74	1.38	0.96	12.47	14.75	62.10	52.40	24.05	31.89	1.21	1.21	1.84	1.12	1.17
MSA 3720 Kalamazoo	971	5.52	0.31	0.41	15.94	12.05	56.41	44.80	27.34	42.74	4.07	9.52	4.38	3.37	5.04
MSA 4040 Lansing	758	4.31	3.02	3.69	20.45	17.15	48.16	32.72	28.36	46.44	3.20	4.80	3.22	2.22	4.47
MSA 6960 Saginaw	85	0.48	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	3.70	0.00	0.00	3.70	0.00
Michigan non-MSA AAs	288	1.64	0.00	0.00	5.46	5.21	44.56	49.65	49.98	45.14	4.72	0.00	5.40	5.92	3.81

* Based on 2003 Peer Mortgage Data (Eastern)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: MICHIGAN										Evaluation Period:				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
MSA 2160 Detroit	23	85.19	13.04	30.43	20.83	8.70	48.39	47.83	17.74	13.04	12.85	29.17	5.13	14.47	7.50	
Limited Review:																
MSA 0440 Ann Arbor	2	7.41	20.34	0.00	28.50	100.00	43.53	0.00	7.63	0.00	3.13	0.00	11.76	0.00	0.00	
MSA 3000 Grand Rapids	1	3.70	3.37	0.00	16.79	0.00	69.12	100.00	10.73	0.00	1.85	0.00	0.00	3.23	0.00	
MSA 3720 Kalamazoo	1	3.70	2.14	0.00	28.50	100.00	56.34	0.00	13.02	0.00	4.35	0.00	11.11	0.00	0.00	
MSA 4040 Lansing	0	0.00	18.84	0.00	23.62	0.00	35.41	0.00	22.13	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 6960 Saginaw	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Michigan non-MSA AAs	0	0.00	0.00	0.00	18.69	0.00	63.66	0.00	17.64	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003												Geography: MICHIGAN					Evaluation Period:				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
MSA 2160 Detroit	425	93.61	6.86	5.88	14.47	15.76	43.41	49.88	34.93	28.47	0.45	0.51	0.54	0.54	0.35						
Limited Review:																					
MSA 0440 Ann Arbor	9	1.98	8.07	0.00	11.78	11.11	55.87	55.56	24.29	33.33	0.07	0.00	0.07	0.07	0.09						
MSA 3000 Grand Rapids	5	1.10	6.18	0.00	13.38	0.00	56.58	100.00	23.86	0.00	0.02	0.00	0.00	0.04	0.00						
MSA 3720 Kalamazoo	4	0.88	1.07	0.00	23.19	50.00	53.84	50.00	21.90	0.00	0.05	0.00	0.13	0.05	0.00						
MSA 4040 Lansing	8	1.76	7.47	50.00	24.28	0.00	35.86	0.00	27.92	50.00	0.12	0.77	0.00	0.00	0.20						
MSA 6960 Saginaw	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.04	0.00	0.00	0.08	0.00						
Michigan non-MSA AAs	3	0.66	0.00	0.00	16.19	66.67	45.57	33.33	38.24	0.00	0.20	0.00	0.83	0.17	0.00						

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: MICHIGAN										Evaluation Period:				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]					
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp	
Full Review:																
MSA 2160 Detroit	2,329	71.68	21.50	14.82	17.24	27.14	21.04	22.16	40.22	35.88	2.61	3.39	2.49	2.01	2.98	
Limited Review:																
MSA 0440 Ann Arbor	209	6.43	16.31	8.37	17.08	20.69	23.61	25.12	43.01	45.81	1.62	1.52	1.23	1.29	2.29	
MSA 3000 Grand Rapids	221	6.80	17.68	15.07	18.86	24.20	24.61	21.92	38.85	38.81	1.43	1.36	1.09	1.20	2.14	
MSA 3720 Kalamazoo	250	7.69	18.27	6.50	18.05	14.63	23.09	26.83	40.58	52.03	4.11	2.74	2.37	4.37	5.40	
MSA 4040 Lansing	205	6.31	21.67	14.85	18.95	21.78	22.00	22.28	37.38	41.09	3.56	3.23	2.46	2.96	5.78	
MSA 6960 Saginaw	16	0.49	17.01	0.00	18.52	25.00	23.47	18.75	40.99	56.25	3.68	0.00	3.31	2.14	8.49	
Michigan non-MSA AAs	19	0.58	13.44	0.00	16.67	21.05	22.54	26.32	47.35	52.63	1.40	0.00	1.24	1.13	2.10	

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Period: JANUARY 1, 2003 TO DECEMBER 31, 2003											Geography: MICHIGAN					Evaluation				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share By Borrower Distribution									
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp					
Full Review:																				
MSA 2160 Detroit	13,608	77.39	21.50	12.33	17.24	21.65	21.04	26.01	40.22	40.01	3.78	5.21	3.89	3.44	3.66					
Limited Review:																				
MSA 0440 Ann Arbor	1,040	5.91	16.31	6.70	17.08	20.00	23.61	24.95	43.01	48.35	1.89	1.66	1.66	1.51	2.39					
MSA 3000 Grand Rapids	834	4.74	17.68	9.83	18.86	24.76	24.61	28.52	38.85	36.89	1.58	1.57	1.64	1.51	1.61					
MSA 3720 Kalamazoo	971	5.52	18.27	7.35	18.05	15.23	23.09	23.84	40.58	53.57	5.27	4.94	4.08	4.81	6.09					
MSA4040 Lansing	758	4.31	21.67	9.93	18.95	17.41	22.00	26.12	37.38	46.53	4.05	3.62	2.91	3.69	5.22					
MSA 6960 Saginaw	85	0.48	17.01	11.90	18.52	25.00	23.47	32.14	40.99	30.95	4.38	5.52	4.30	4.31	4.16					
Michigan non-MSA AAs	288	1.64	13.44	7.72	16.67	17.54	22.54	27.37	47.35	47.37	5.73	7.59	5.61	5.23	5.86					

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 2.0% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003				Geography: MICHIGAN			Evaluation Period:		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
MSA 2160 Detroit	425	93.61	63.61	98.12	65.65	15.29	19.06	0.45	1.44
Limited Review:									
MSA 0440 Ann Arbor	9	1.98	66.92	100.00	33.33	33.33	33.33	0.07	0.19
MSA 3000 Grand Rapids	5	1.10	64.31	100.00	100.00	0.00	0.00	0.02	0.06
MSA 3720 Kalamazoo	4	0.88	65.83	100.00	50.00	25.00	25.00	0.05	0.14
MSA 4040 Lansing	8	1.76	63.13	100.00	37.50	37.50	25.00	0.12	0.33
MSA 6960 Saginaw	0	0.00	67.59	0.00	0.00	0.00	0.00	0.04	0.14
Michigan non-MSA AAs	3	0.66	69.80	100.00	100.00	0.00	0.00	0.20	0.58

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Charter Number: 24340

Table 14. Qualified Investments

QUALIFIED INVESTMENTS TO AUGUST 30, 2004		Geography: MICHIGAN						Evaluation Period: APRIL 1, 2001	
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MSA 2160 Detroit	0	0	80	15,671	80	15,671	64.73	0	0
Limited Review:									
MSA 0440 Ann Arbor	0	0	2	1,667	2	1,667	6.89	0	0
MSA 3000 Grand Rapids	0	0	2	2,558	2	2,558	10.57	0	0
MSA 3720 Kalamazoo	0	0	4	186	4	186	.77	0	0
MSA 4040 Lansing	0	0	4	557	4	557	2.30	0	0
MSA 6960 Saginaw	0	0	2	490	2	490	2.02	0	0
Michigan non-MSA AAs	0	0	2	284	2	284	1.17	0	0
Statewide/Regional	1	733	2	2,063	3	2,796	11.55	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: MICHIGAN							
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MSA 2160 Detroit	93.74	96	89.72	7.29	12.50	46.88	33.33	3	0	0	0	+2	+1	10.98	20.44	39.50	29.07
Limited Review:																	
MSA 0440 Ann Arbor	1.51	3	2.80	0.00	0.00	66.67	33.33	0	0	0	0	0	0	7.72	13.57	52.93	25.78
MSA 3000 Grand Rapids	.29	1	.94	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.15	16.46	59.33	21.06
MSA 3720 Kalamazoo	1.64	3	2.80	0.00	33.33	66.67	0.00	0	0	0	0	0	0	2.71	21.83	52.62	22.84
MSA 4040 Lansing	.52	1	.94	0.00	0.00	0.00	100.00	0	0	0	0	0	0	9.12	23.96	41.33	24.31
MSA 6960 Saginaw	.66	1	.94	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Michigan non-MSA AAs	1.64	2	1.86	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	7.77	44.71	47.52

Charter Number: 24340

Table 1. Lending Volume

LENDING VOLUME TO DECEMBER 31, 2003		Geography: VERMONT								Evaluation Period: JANUARY 1, 2003		
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Vermont non-MSA AAs	62.79	1,766	193,043	58	6,338	0	0	0	0	1,824	199,381	70.03
Limited Review:												
MSA 1305 Burlington	37.21	1,044	157,067	37	2,981	0	0	3	9,406	1,084	169,454	29.97

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 1, 2001 to August 30, 2004.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Charter Number: 24340

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2003 TO DECEMBER 31, 2003		Geography: VERMONT										Evaluation Period: JANUARY 1,				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Vermont non-MSA AAs	200	56.98	0.00	0.00	4.86	9.00	77.66	69.50	17.48	21.50	4.92	0.00	8.96	4.85	4.33	
Limited Review:																
1305 MSA Burlington	151	43.02	0.81	3.97	7.15	9.93	61.85	52.32	30.19	33.77	3.41	9.38	4.34	3.07	3.54	

* Based on 2003 Peer Mortgage Data (Eastern)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: VERMONT								Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Vermont non-MSA AAs	1,564	63.68	0.00	0.00	4.86	6.52	77.66	77.94	17.48	15.54	10.15	0.00	17.74	11.16	6.21
Limited Review:															
MSA 1305 Burlington	892	36.32	0.81	1.91	7.15	7.06	61.85	53.59	30.19	37.44	5.22	8.42	6.47	4.95	5.34

* Based on 2003 Peer Mortgage Data (Eastern)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 2003 TO DECEMBER 31, 2003		Geography: VERMONT										Evaluation Period: JANUARY 1,				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Vermont non-MSA AAs	2	66.67	0.00	0.00	11.42	0.00	61.45	50.00	27.13	50.00	4.76	0.00	0.00	5.00	11.1 1	
Limited Review:																
MSA 1305 Burlington	1	33.33	13.90	100.00	20.83	0.00	49.65	0.00	15.62	0.00	1.69	7.69	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: VERMONT										Evaluation Period:				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Vermont non-MSA AAs	58	61.05	0.00	0.00	8.91	13.79	69.76	79.31	21.32	6.90	0.51	0.00	0.88	0.67	0.18	
Limited Review:																
MSA 1305 Burlington	37	38.95	11.41	0.00	11.08	8.11	50.55	48.65	26.96	43.24	0.58	0.00	0.57	0.60	0.84	

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 1, 2003 TO DECEMBER 31, 2003		Geography: VERMONT										Evaluation Period: JANUARY				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]					
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Vermont non-MSA AAs	200	56.98	16.53	4.50	18.34	16.00	24.45	30.00	40.68	49.50	5.56	6.04	4.90	7.36	4.99	
Limited Review:																
MSA 1305 Burlington	151	43.02	17.04	2.65	19.28	27.81	24.85	25.17	38.83	44.37	3.90	1.27	4.05	3.25	4.96	

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: VERMONT									Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share by Borrower Income*				
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Vermont non-MSA AAs	1,564	63.68	16.53	6.03	18.34	20.90	24.45	28.27	40.68	44.81	11.69	14.73	15.42	13.45	9.56
Limited Review:															
MSA 1305 Burlington	892	36.32	17.04	6.80	19.28	23.78	24.85	28.88	38.83	40.54	6.10	5.64	6.68	5.81	6.08

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

Charter Number: 24340

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003				Geography: VERMONT			Evaluation Period:		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Vermont non-MSA AAs	58	61.05	65.12	96.55	72.41	17.24	10.34	0.51	1.38
Limited Review:									
MSA 1305 Burlington	37	38.95	62.39	97.30	86.49	5.41	8.11	0.58	1.76

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.05% of small loans to businesses originated and purchased by the bank.

Charter Number: 24340

Table 14. Qualified Investments

QUALIFIED INVESTMENTS 2001 TO AUGUST 30, 2004		Geography: VERMONT						Evaluation Period: APRIL 1,	
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Vermont non-MSA AAs	0	0	4	445	4	445	21.32	0	0
Limited Review:									
MSA 1305 Burlington	4	1,259	4	383	8	1,642	78.68	0	0
Statewide/Regional	0	0	0	0	0	0	0	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Charter Number: 24340

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: VERMONT							
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Vermont non-MSA AAs	70.03	19	70.37	0.00	15.79	68.42	15.79	1	0	0	+1	0	0	0.00	6.79	77.20	16.01
Limited Review:																	
MSA 1305 Burlington	29.97	8	29.63	12.50	25.00	25.00	37.50	0	0	0	0	0	0	2.71	10.88	60.35	26.06

Charter Number: 24340

Table 1. Lending Volume

LENDING VOLUME 2003 TO DECEMBER 31, 2003		Geography: MASSACHUSETTS								Evaluation Period: JANUARY 1,		
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
MSA 8000 Springfield	99.58	2,088	257,793	54	5,498	0	0	0	0	2,142	263,291	100.00
Limited Review:												
MSA 1120 Boston	0.05	1	162	0	0	0	0	0	0	1	162	0.00
MSA 6320 Pittsfield	0.23	5	870	0	0	0	0	0	0	5	870	0.00
MSA 9240 Worcester	0.14	3	498	0	0	0	0	0	0	3	498	0.00

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 1, 2001 to August 30, 2004.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Charter Number: 24340

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: MASSACHUSETTS										Evaluation Period:				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
MSA 8000 Springfield	362	99.72	2.66	3.59	11.44	15.75	52.35	43.09	33.55	37.57	3.24	2.12	3.28	2.74	4.35	
Limited Review:																
MSA 1120 Boston	0	0.00	0.00	0.00	0.00	0.00	90.54	0.00	9.46	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 6320 Pittsfield	1	0.28	1.95	0.00	10.47	0.00	71.41	100.00	16.17	0.00	0.12	0.00	0.00	0.17	0.00	
MSA 9240 Worcester	0	0.00	6.66	0.00	25.75	0.00	56.53	0.00	11.06	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Eastern)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: MASSACHUSETTS								Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 8000 Springfield	1,726	99.54	2.66	1.51	11.44	10.83	52.35	48.20	33.55	39.46	5.20	3.57	5.89	5.05	5.30
Limited Review:															
MSA 1120 Boston	1	0.06	0.00	0.00	0.00	0.00	90.54	100.00	9.46	0.00	0.03	0.00	0.00	0.03	0.00
MSA 6320 Pittsfield	4	0.23	1.95	0.00	10.47	0.00	71.41	75.00	16.17	25.00	0.20	0.00	0.00	0.21	0.32
MSA 9240 Worcester	3	0.17	6.66	0.00	25.75	0.00	56.53	66.67	11.06	33.33	0.03	0.00	0.00	0.03	0.07

* Based on 2003 Peer Mortgage Data (Eastern)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: MASSACHUSETTS								Evaluation Period:					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 8000 Springfield	0	0.00	27.96	0.00	20.46	0.00	36.73	0.00	14.85	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
MSA 1120 Boston	0	0.00	0.00	0.00	0.00	0.00	97.00	0.00	3.00	0.00	0.00	0.00	0.00	0.00	0.00
MSA 6320 Pittsfield	0	0.00	40.94	0.00	24.06	0.00	34.76	0.00	0.24	0.00	0.00	0.00	0.00	0.00	0.00
MSA 9240 Worcester	0	0.00	34.63	0.00	37.45	0.00	24.91	0.00	3.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2003 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: MASSACHUSETTS								Evaluation Period:				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 8000 Springfield	54	100.00	13.70	18.52	17.07	20.37	41.86	50.00	27.36	11.11	0.32	0.65	0.44	0.35	0.13
Limited Review:															
MSA 1120 Boston	0	0.00	0.00	0.00	0.00	0.00	72.32	0.00	27.68	0.00	0.00	0.00	0.00	0.00	0.00
MSA 6320 Pittsfield	0	0.00	27.20	0.00	19.01	0.00	47.96	0.00	5.83	0.00	0.00	0.00	0.00	0.00	0.00
MSA 9240 Worcester	0	0.00	24.05	0.00	39.83	0.00	31.57	0.00	4.55	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: MASSACHUSETTS										Evaluation Period:				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]					
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
MSA 8000 Springfield	362	99.72	21.71	4.71	16.97	26.87	21.77	28.53	39.56	39.89	3.65	2.43	3.75	3.46	3.97	
Limited Review:																
MSA 1120 Boston	0	0.00	16.77	0.00	18.39	0.00	24.87	0.00	39.97	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 6320 Pittsfield	1	0.28	21.67	0.00	19.64	0.00	24.39	100.00	34.30	0.00	0.14	0.00	0.00	0.47	0.00	
MSA 9240 Worcester	0	0.00	32.90	0.00	21.01	0.00	20.26	0.00	25.83	0.00	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: MASSACHUSETTS									Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share By Borrower Income [*]				
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 8000 Springfield	1,726	99.54	21.71	4.84	16.97	18.78	21.77	31.14	39.56	45.25	5.81	5.79	5.91	6.18	5.54
Limited Review:															
MSA 1120 Boston	1	0.06	16.77	0.00	18.39	0.00	24.87	0.00	39.97	100.00	0.03	0.00	0.00	0.00	0.08
MSA 6320 Pittsfield	4	0.23	21.67	0.00	19.64	0.00	24.39	75.00	34.30	25.00	0.22	0.00	0.00	0.56	0.14
MSA 9240 Worcester	3	0.17	32.90	0.00	21.01	0.00	20.26	0.00	25.83	100.00	0.03	0.00	0.00	0.00	0.10

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003				Geography: MASSACHUSETTS			Evaluation Period:		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
MSA 8000 Springfield	54	100.00	64.27	96.30	75.93	16.67	7.41	0.32	0.85
Limited Review:									
MSA 1120 Boston	0	0.00	56.59	0.00	0.00	0.00	0.00	0.00	0.00
MSA 6320 Pittsfield	0	0.00	62.25	0.00	0.00	0.00	0.00	0.00	0.00
MSA 9240 Worcester	0	0.00	63.17	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS APRIL 1, 2001 TO AUGUST 30, 2004		Geography: MASSACHUSETTS						Evaluation Period:	
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MSA 8000 Springfield	0	0	5	762	5	762	88.60	0	0
Limited Review:									
MSA 1120 Boston	0	0	0	0	0	0	0.00	0	0
MSA 6320 Pittsfield	0	0	0	0	0	0	0.00	0	0
MSA 9240 Worcester	0	0	1	98	1	98	11.40	0	0
Statewide/Regional	0	0	0	0	0	0	0	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Charter Number: 24340

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: MASSACHUSETTS								
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																		
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																		
MSA 8000 Springfield	100.00	10	76.93	10.00	20.00	50.00	20.00	0	0	0	0	0	0	0	9.53	18.15	44.58	27.75
Limited Review:																		
MSA 1120 Boston	0.00	1	7.69	0.00	0.00	100.00	0.00	1	0	0	0	+1	0	0.00	0.00	91.99	8.01	
MSA 6320 Pittsfield	0.00	1	7.69	0.00	0.00	100.00	0.00	1	0	0	0	+1	0	8.00	18.25	62.67	11.07	
MSA 9240 Worcester	0.00	1	7.69	0.00	100.00	0.00	0.00	1	0	0	+1	0	0	22.04	33.00	38.24	6.72	

Charter Number: 24340

Table 1. Lending Volume

LENDING VOLUME TO DECEMBER 31, 2003		Geography: INDIANA								Evaluation Period: JANUARY 1, 2003		
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
MSA 3480 Indianapolis	93.60	395	99,055	0	0	0	0	0	0	395	99,055	0.00
Limited Review:												
MSA 3920 Lafayette	6.40	27	2,170	0	0	0	0	0	0	27	2,170	0.00

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2001 to August 30, 2004.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate. There were no branches open as of June 30, 2003 for either assessment area.

Charter Number: 24340

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2003 TO DECEMBER 31, 2003		Geography: INDIANA										Evaluation Period: JANUARY 1,				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
MSA 3480 Indianapolis	284	93.73	3.48	0.70	20.02	3.17	43.94	30.99	32.56	65.14	0.62	0.17	0.14	0.44	1.02	
Limited Review:																
MSA 3920 Lafayette	19	6.27	0.25	5.26	9.47	5.26	54.56	42.11	35.72	47.37	0.59	3.70	0.42	0.52	0.62	

* Based on 2003 Peer Mortgage Data (Eastern)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: INDIANA										Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
MSA 3480 Indianapolis	111	93.28	3.48	0.00	20.02	5.41	43.94	21.62	32.56	72.97	0.11	0.00	0.05	0.05	0.17	
Limited Review:																
MSA 3920 Lafayette	8	6.72	0.25	0.00	9.47	12.50	54.56	25.00	35.72	62.50	0.08	0.00	0.15	0.04	0.12	

* Based on 2003 Peer Mortgage Data (Eastern)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 2003 TO DECEMBER 31, 2003		Geography: INDIANA										Evaluation Period: JANUARY 1,				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
MSA 3480 Indianapolis	0	0.00	6.95	0.00	33.47	0.00	45.01	0.00	14.58	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
MSA 3920 Lafayette	0	0.00	28.12	0.00	23.97	0.00	20.11	0.00	27.79	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

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Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: INDIANA								Evaluation Period:				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 3480 Indianapolis	0	0.00	3.26	0.00	18.49	0.00	46.74	0.00	31.39	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
MSA 3920 Lafayette	0	0.00	5.61	0.00	33.10	0.00	37.00	0.00	24.09	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 2003 TO DECEMBER 31, 2003		Geography: INDIANA										Evaluation Period: JANUARY 1,				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]					
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
MSA 3480 Indianapolis	284	93.73	19.21	4.44	18.14	12.96	22.37	22.59	40.29	60.00	0.71	0.20	0.32	0.63	1.39	
Limited Review:																
MSA 3920 Lafayette	19	6.27	18.32	0.00	18.64	11.11	23.73	50.00	39.30	38.89	0.66	0.00	0.28	1.11	0.81	

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 5.0% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: INDIANA									Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share By Borrower Income*				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 3480 Indianapolis	111	93.28	19.21	1.08	18.14	4.30	22.37	9.68	40.29	84.95	0.12	0.01	0.03	0.04	0.22
Limited Review:															
MSA 3920 Lafayette	8	6.72	18.32	20.00	18.64	20.00	23.73	60.00	39.30	0.00	0.06	0.14	0.06	0.13	0.00

** As a percentage of loans with borrower income information available. No information was available for 17.6% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003				Geography: INDIANA			Evaluation Period:		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
MSA 3480 Indianapolis	0	0.00	59.74	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
MSA 3920 Lafayette	0	0.00	62.80	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS 2001 TO AUGUST 30, 2004		Geography: INDIANA						Evaluation Period: APRIL 1,	
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MSA 3480 Indianapolis	0	0	1	593	1	593	100.00	0	0
Limited Review:									
MSA 3920Lafayette	0	0	0	0	0	0	0.00	0	0
Statewide/Regional	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: INDIANA							
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MSA 3480 Indianapolis	0.00	13	81.25	0.00	23.08	46.15	30.77	13	0	0	+3	+6	+4	5.52	25.17	41.62	27.69
Limited Review:																	
MSA 3920 Lafayette	0.00	3	18.75	0.00	33.33	33.33	33.34	3	0	0	+1	+1	+1	11.66	13.40	41.74	28.61