



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

December 15, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**National City Bank
Charter Number: 786**

**1900 E. Ninth Street
Cleveland, Ohio 44114**

**Office of the Comptroller of the Currency
Large Bank Supervision
250 E. Street, S.W.
Washington, D.C. 20219**

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 **National City Bank (NCB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	National City Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		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:

NCB’s overall performance under the Lending Test is good.

- The primary rating areas, as well as the majority of the remaining rating areas are rated good on the basis of geographic and borrower distribution and lending activity. The Lending Test performance in one of the rating areas is Outstanding.
- The distribution of loans to geographies of different income levels and the distribution of loans to borrowers of different income levels are good. Lending in both home purchase and small loan to business demonstrated good performance.
- The bank’s community development (CD) lending was positive and generally enhanced lending performance. One of the general rating area’s overall lending performance was elevated to excellent based on the area’s CD volume and responsiveness of community development.

NCB’s overall performance under the Investment Test is adequate.

- The bank’s performance was adequate for two of the primary rating areas and poor for the remaining primary rating area. In the other rating areas, two showed excellent performance, two showed good performance, three displayed adequate performance and three showed poor performance.

NCB's overall performance under the Service Test is good.

- NCB's overall branch network is accessible to geographies and individuals of different income levels. NCB's branch delivery system in one primary rating area that carries the highest volume of NCB's deposits is good. The two other primary rating areas' branch delivery systems are excellent. The overall rating is primarily based on branch distribution.
- NCB's record of opening and closing branch offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies.
- NCB's branch hours are generally consistent across the branch network and they do not vary in a way that inconveniences portions of the AAs, particularly low- and moderate-income geographies.
- Community development services were excellent in one primary rating area and good in the other two primary rating areas.

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 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: 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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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 householder 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, and 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 preapproval 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: 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: 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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

National City Bank (NCB) is a wholly owned subsidiary of National City Corporation (NCC), both of which are headquartered in Cleveland, Ohio. NCB is an interstate bank operating in nine states including Florida, Illinois, Indiana, Kentucky, Michigan, Missouri, Ohio, Pennsylvania, and Wisconsin. The bank's interstate (footprint) operations were expanded in July 2006 when NCC consolidated its five national banking charters (NCB Indiana, NCB Southern Indiana, NCB Kentucky, NCB Midwest, and NCB Pennsylvania) into the NCB Ohio charter.

As of September 30, 2008, NCB had total assets of \$142 billion. Total loans of \$113 billion were comprised of residential (44%) and commercial (38%), consumer (6%), and other (12%) loans. NCB had total Tier 1 capital of \$13 billion.

NCB's core businesses include commercial and retail banking, mortgage financing and servicing, and consumer finance and asset management. NCB's loan products include traditional banking products, and wholesale and nonprime activities that were primarily generated by bank subsidiaries, National City Mortgage Company (NCM) and First Franklin Financial Corporation (FFFC). NCB sold FFFC at year-end 2006. Wholesale activities were eased as of year-end 2007.

We used the lending and community development lending and investment activities of five affiliated bank entities. We also included CRA data as of the acquisition dates for the four institutions NCB merged into NCB during the review period: Allegiant Bank in July 2004 (St. Louis, Missouri), Pioneer Bank and Trust Company in August 2006 (St. Louis, Missouri), Harbor Federal Savings Bank in March 2007 and Fidelity Federal Bank and Trust in April 2007 (Florida markets). MidAmerica Bank (Claredon Hills, Illinois) merged into NCB in February 2008, which we did not consider in this CRA evaluation due to its recent occurrence and insufficient data to analyze the bank's performance.

NCB was negatively impacted by the mortgage market disruption during 2007 and 2008 which somewhat impacted its ability to allocate funds for CRA purposes.

The bank's last CRA performance was rating "Outstanding" in the public evaluation dated June 30, 2005.

Refer to the Market Profiles in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of the Evaluation

Evaluation Period/Products Evaluated

NCB's performance is evaluated based on several evaluation periods that are necessary to reflect the timing of merger and acquisition activity that occurred during the evaluation period.

NCB was last evaluated primarily based on its core activities in Ohio. The evaluation periods ended as follows: Lending Test through December 31, 2004, the Investment Test, Service Test, and community development through June 30, 2005. The evaluation periods for Ohio start from when the prior ones ended as follows: Lending Test from January 1, 2005, through September 30, 2008, and the Investment Test, Service Test, and community development activities from July 1, 2005, through the start of the CRA analysis phase December 15, 2008.

In the Lending Test tables in Ohio, we included three AAs which were multistate state AAs, but NCB only had branches in the Ohio portion of the AAs. The AAs were (Cincinnati-Middletown, OH-IN-KY MSA), Huntington-Ashland, OH-KY, MSA, and Youngstown-Warren-Boardman, OH-PA, MSA). Upon the July 2006 merger, when the bank's branches increased beyond Ohio, these AAs became subject to multistate requirements and data subsequent to the merger is shown in the multistate table. The percentage of deposit information is only shown in the multistate table.

Additional evaluation periods reflect merger and acquisition activity and the start date of the evaluation period reflects after the date of the merger through the start date of the evaluation phase of the CRA examination.

- For the States of Illinois, Indiana, Kentucky, Michigan, and Pennsylvania the evaluation period begins July 1, 2006, through December 15, 2008.
- For the State of Florida the evaluation period begins January 1, 2007, through December 15, 2008.

In evaluating the bank's lending performance, we reviewed NCB's residential mortgage loans and small business loans. An analysis of multifamily loans and small farm lending were not considered meaningful due to a very low volume of loans made during the evaluation period; and therefore, they were not considered in the evaluation of the bank's performance. The tables for small loans to farms and multifamily are included in the PE for informational purposes.

In the Service Test table for Indiana, the Bloomington AA is not included because NCB does not have a branch there, only a full-service automated teller machine (ATM). The Service Test table does not include data for ATMs. We did not evaluate or include detail on the bank's distribution of its ATMs.

Data Integrity

We verified the accuracy of home mortgage loans, small loans to businesses, and community development loans, investments, and services by conducting independent testing. We found a systemic error involving the multi-reporting of small loans to businesses data during 2005 through 2007. Our evaluation was based on small businesses data that was corrected by the bank. Additionally, the community development data contained a significant percentage of data that did not meet the definition of community development and thus they were not included or considered in our analysis.

Selection of Areas for Full-Scope Review

We selected 13 of the 74 bank's delineated AAs for full scope review. In each state where the bank had an office, the assessment area with the largest NCB deposit presence was selected. Every multistate metropolitan statistical area (MMSA) with branches in one or more states or multistate metropolitan division (MD) was also selected for full-scope review. In the Chicago MMSA, we selected the largest multistate MD for review. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section (as applicable) for details regarding how the areas were selected. For additional information on the AAs, refer to Appendix A.

Ratings

The bank's overall rating is a blend of the MMSA ratings and state ratings. Three primary rating areas carried the greatest weight in our conclusions due to these areas representing the bank's most significant markets in terms of deposit concentrations. In order of significance, these areas were the states of Ohio, Pennsylvania, and Michigan. These three areas contain 58.3 percent of the bank's total deposits. The MMSA ratings and state ratings are based primarily on those areas that received full-scope reviews, but with consideration also given to the bank's performance in areas receiving limited-scope reviews. When consolidating AA conclusions into state ratings, the full-scope area received the greatest weight. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

For each full-scope rating area, when determining the Lending Test conclusions by AA, HMDA loan products were weighted slightly more heavily than small loans to businesses. The weighting reflects NCB's higher loan volume over the evaluation period. The combined geographic and borrower distribution of HMDA loans and small businesses provided the most weight to AA Lending Test conclusions. Expectations for low- and moderate-income geographies were similar. Expectations for lending to low-income borrowers were slightly lower than for lending to moderate-income borrowers due to performance context issues such as the percentage of the population living below the poverty level and unable to qualify for most bank lending. Significant housing affordability issues were considered in our analysis in the West Palm Beach-Boca Raton-Boynton Beach MD and Chicago-Naperville-Joliet MD. Community development lending, based on volume and complexity, and the use of innovative and flexible lending programs provided either a neutral or positive impact to AA conclusions.

When determining Investment Test AA conclusions, investment and contribution activity and responsiveness to community development needs were given the most weight. Qualitative factors, such as complexity and innovation were also considered.

Finally, when determining Service Test conclusions, accessibility to branch offices and changes in branch locations provided the most weight. Branch hours and services as well as community development services received a lesser amount of weight. NCB's overall rating is a blend of the multistate MSA/MD and state ratings.

Community Contacts

This evaluation considered input received directly from community members as well as input obtained through other regulatory sources. In total, we conducted or reviewed at least 33 contacts in 12 of the 13 full-scope AAs in the bank's footprint.

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 of Ohio Rating

CRA Rating for Ohio¹:	<u>Satisfactory</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Low Satisfactory</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating:

- Good geographic distribution and good borrower distribution of HMDA loans and excellent small loans to businesses distribution, and lending levels that reflect adequate responsiveness to the community credit needs;
- Adequate level of community development investments; and
- Good retail banking services accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Ohio

As of June 30, 2008, NCB is the largest deposit taking institution in the State of Ohio. NCB has \$34.7 billion in deposits that represents a market share of 15.23 percent of Ohio's deposits. Of NCB's 13 rating areas; NCB's deposits in Ohio rank first and account for 32.31 percent of NCB's total deposits. NCB has 313 branch locations in its 12 defined AAs in Ohio. Primary competitors include Huntington National Bank and Key Bank, N.A. with deposit market shares of 13 percent and 11 percent, respectively. Refer to the market profile for the State of Ohio in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Ohio

The Cleveland-Elyria-Mentor MSA (Cleveland AA) was selected to receive a full-scope review. It is the largest of the bank's 12 designated AAs in Ohio based on deposit and loan volume. Within the State of Ohio, NCB has 65 percent of its deposits and 22 percent of its loans in the Cleveland AA. The ratings for the State of Ohio are primarily based on performance in the Cleveland AA. See the "Ratings" section in the Scope of Evaluation section and the table in Appendix A for more information.

¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Ohio is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Cleveland AA is good. Performance in the limited-scope AAs did not negatively impact the Lending Test rating in Ohio.

Cleveland AA

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.

NCB's lending demonstrates adequate responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Cleveland AA. FDIC deposit market share data ranks NCB first in deposits with a 32 percent market share. Market data for lending ranks NCB fifth in home purchase (4.80 percent market share); second in home improvement (7.84 percent market share); and fifth in refinance (4.43 percent market share) amongst deposit taking institutions within the AA. The lower lending market share reflects a high number of competitors in the AA. NCB's small business lending market share rank is eighth (3.18 percent market share).

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is good. This conclusion is based on good home mortgage performance and good small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, 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.

NCB's home purchase loan geographic distribution is good. The bank's portion of home purchase loans made in low-income geographies exceeds the percentage of owner-occupied housing units in low-income geographies. The bank's portion of home purchase loans made in moderate-income geographies is less than the percentage of owner occupied housing units in moderate-income geographies. NCB's home purchase market share in low-income geographies exceeds its overall home purchase market share. NCB's home purchase market share in moderate-income geographies is near to its overall home purchase market share.

NCB's home improvement loan geographic distribution is excellent. The bank's portion of home improvement loans made in both low- and moderate-income geographies exceeds the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's home improvement market share in low-income geographies is near to its overall

home improvement market share. NCB's home improvement market share in moderate-income geographies exceeds its overall home improvement market share.

NCB's refinance loan geographic distribution is adequate. The bank's portion of refinance loans made in low-income geographies is significantly less than the percentage of owner occupied housing units in low-income geographies. The bank's portion of refinance loans made in moderate-income geographies is less than the percentage of owner occupied housing units in moderate-income geographies. NCB's refinance market share in both the low- and moderate-income geographies is less than its overall refinance market share.

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 originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is good. The bank's portion of small loans to businesses made in both the low- and moderate-income geographies is less than the percentage of businesses in low- and moderate-income geographies. Performance is enhanced by excellent small loans to businesses market share. NCB's small loans to businesses market share in both the low- and moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the State of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were not made to the geographies in the AA. We considered loan distributions, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made a good percentage of its loans within its AAs compared to outside its AAs. The bank made 95 percent of its home mortgage loans and 83 percent of its small loans to businesses within the Ohio AAs.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is good. This conclusion is based on good home mortgage performance and good small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 8, 9, 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.

NCB's home purchase loan borrower distribution is good. The bank's portion of home purchase loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is adequate after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for low-income families is near to its overall home purchase market share. NCB's home purchase market share for moderate-income families is less than to its overall home purchase market share.

NCB's home improvement loan borrower distribution is excellent. The bank's portion of home improvement loans made to low-income borrowers is less than the percentage of low-income families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share for both the low- and moderate-income families exceeds its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income families exceeds the percentage of moderate-income families. NCB's refinance market share for low-income families substantially meets its overall refinance market share. NCB's refinance market share for moderate-income families is less than its overall refinance market share.

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 originations and purchases of small loans to businesses.

NCB's borrower distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses with revenues less than \$1 million is near to the percentage of small businesses. NCB's small loan market share exceeds its overall market share. The bank made a majority of these loans in smaller amounts.

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.

NCB's level of CD lending had a positive impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. NCB made 24 CD loans totaling \$61 million that directly benefited the Cleveland AA. Complex loans included loans where a large number of the projects were established based on specific community development incentives, such as tax abatements. These types of loans required multiple funding sources which included various government programs. These projects were governed by certain stipulations which required extensive time and project management skills. There were eleven loans to ten nonprofit organizations for affordable housing, ten loans to seven nonprofit organizations that provide services for services to low- and moderate-income persons, two loans to one nonprofit organization for revitalization/stabilization of low- and moderate-income areas, and one loan to a nonprofit organization for economic development and financing small businesses.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Akron, Mansfield, Springfield, Toledo, Weirton-Steubenville, and Wheeling AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Ohio. In the Canton-Massillon, Columbus, Dayton, Sandusky, and non-metropolitan AAs, the bank's performance is stronger than the bank's overall performance in Ohio due to a more favorable geographic and/or borrower distribution of home mortgage loans and due to a high level of CD loans in the Columbus and Dayton AAs.

Performance in limited-scope AAs did not negatively impact the Lending Test rating for Ohio. Refer to the Tables 1 through 13 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, performance in the Cleveland AA is adequate. NCB's responsiveness to the identified needs of the AA is adequate. Performance in the limited-scope AAs did not negatively impact the Investment Test rating in Ohio.

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, NCB made 63 investments in the full-scope AA totaling \$43.8 million. We also considered the ongoing impact that investments made prior to the current evaluation period had within the AA. As of December 15, 2008, 14 prior period investments had a total remaining balance of \$12 million. NCB's headquarters is located in the Cleveland AA and the bank has its largest presence, as measured by deposits and branches, in this AA. The volume and nature of the bank's investments demonstrate adequate responsiveness to community needs relative to the bank's resources and its presence in the area. The bank also made investments in statewide and regional funds during the evaluation period and prior to the current evaluation period that had the potential to impact one or more AAs. The bank could not evidence that the investments directly impacted any of its AAs and the investments are not given significant weight in this evaluation. As noted previously, the table summarizing the bank's investments within the State of Ohio includes investments made within AAs that are also identified as Multistate MSAs. These AAs are included within the State of Ohio for the time periods prior to the consolidation of bank charters and the AAs meeting the definition of a Multistate MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Weirton-Steubenville AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in Ohio. Performance in the Columbus and Toledo AAs is stronger than the bank's overall performance in Ohio due to a higher volume of investments. Performance in the Akron, Canton-Massillon, Dayton, Mansfield, Sandusky, Springfield, Wheeling and non-metropolitan AAs is weaker than the bank's overall performance in Ohio due to a lower volume of investments.

Performance in the limited-scope AAs did not have a significant negative impact on the overall Investment Test rating as the largest limited-scope AAs had stronger performance which offset the weaker performance in the smaller limited-scope AAs.

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. Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Ohio.

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.

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

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the Cleveland AA. The bank did not open or close any branches in low- or moderate-income areas over the course of the evaluation period in the Cleveland AA. During the review, there was a net decrease of two middle- or upper-income geography offices.

NCB's hours and services offered throughout the Cleveland AA were good. Services offered and hours of operation were generally consistent across the branch network and do not vary in a way that is inconvenient for residents of the AA.

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Cleveland AA was excellent and had a positive impact on the Service Test performance. The CD services were responsive to local community development needs and the volume of services provided was excellent. Bank employees were 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, financial literacy seminars, and technical expertise to non-profit or government organizations. In the Cleveland AA, 23 employees provided services to 23 community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Akron, Canton-Massillon, Columbus, and Dayton AAs is not inconsistent with the bank's overall High Satisfactory performance under the Service Test in Ohio. In the Mansfield and Toledo AAs the bank's performance is weaker than the bank's overall performance in Ohio due to weaker branch distribution. In the Sandusky, Springfield, Weirton-Steubenville, Wheeling, and non-metropolitan AAs the bank's performance is stronger than the bank's overall performance in Ohio due to stronger branch distribution.

Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Ohio. Refer to Table 15 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

State of Pennsylvania Rating

CRA Rating for Pennsylvania **Satisfactory:**

The lending test is rated: **High Satisfactory**
The investment test is rated: **Needs to Improve**
The service test is rated: **Outstanding**

The major factors that support this rating include:

- Adequate geographic distribution and good borrower distribution of HMDA loans; good geographic distribution and excellent borrower distribution of small loans to businesses; and lending levels that reflect good responsiveness to the community credit needs;
- Poor level of community development investments; and
- Excellent retail banking services readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Pennsylvania

As of June 30, 2008, NCB is the fifth largest deposit taking institution in the State of Pennsylvania. NCB has \$13.6 billion in deposits that represent a market share of 5.02 percent in Pennsylvania's deposits. Of the bank's 13 rating areas; NCB's deposits in Pennsylvania rank second and account for 13.65 percent of NCB's total deposits. NCB has 180 branch locations in its four defined AAs in Pennsylvania. Primary competitors include PNC, N.A. who is lead deposit taker and Wachovia Bank, N.A. with deposit market shares of 15 percent and 11 percent, respectively. Refer to the market profile for the State of Pennsylvania in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Pennsylvania

The Pittsburgh MSA (Pittsburgh AA) was selected to receive a full-scope review. It is the largest of the bank's four designated AAs in Pennsylvania based on deposit and loan volume. Within the State of Pennsylvania, NCB has 83 percent of its deposits and 73 percent of its loans in the Pittsburgh AA. The ratings are primarily based on performance in the Pittsburgh AA. See the "Ratings" section in the Scope of Evaluation section and the table in Appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Pennsylvania is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Pittsburgh AA is good. Performance in the limited-scope AAs did not negatively impact the Lending Test rating in Pennsylvania.

Pittsburgh AA

Lending Activity

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

NCB's lending demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Pittsburgh AA. FDIC deposit market share data ranks NCB second in deposits with a 15 percent market share. Market data for lending ranks NCB third in home purchase (5.35 percent market share), fourth in home improvement (7.05 percent market share), and second in refinance (7.41 percent market share) within the AA. The lower lending market share reflects a high number of competitors in the AA. NCB's small businesses lending market share rank is ninth (3.83 percent market share).

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution of HMDA loans is adequate and of small loans to businesses is good. This conclusion is based on adequate home mortgage performance and good small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Pennsylvania 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.

NCB's home purchase loan geographic distribution is adequate. The bank's portion of home purchase loans made in low-income geographies is significantly less than the percentage of owner occupied housing units in low-income geographies. The bank's portion of home purchase loans made in moderate-income geographies substantially meets the percentage of owner occupied housing units in moderate-income geographies. NCB's home purchase market share in both the low- and moderate-income geographies exceeds its overall home purchase market share.

NCB's home improvement loan geographic distribution is adequate. The bank's portion of home improvement loans made in low-income geographies is significantly less than the percentage of owner occupied housing units in low-income geographies. The bank's portion of home improvement loans made in moderate-income geographies exceeds the percentage of owner occupied housing units in moderate-income geographies. NCB's home improvement market share in low-income geographies is significantly less than its overall home improvement market share. NCB's home improvement market share in moderate-income geographies exceeds its overall home improvement market share.

NCB's refinance loan geographic distribution is adequate. The bank's portion of refinance loans made in low-income geographies is significantly less than the percentage of owner occupied housing units in low-income geographies. The bank's portion of refinance loans made in moderate-income geographies is less than the percentage of owner occupied housing units in moderate-income geographies. NCB's refinance market share in low-income geographies is less than its overall refinance market share. NCB's market share in moderate-income geographies is near to its overall refinance market share.

Small Loans to Businesses

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

NCB's geographic distribution of small loans to businesses in the Pittsburgh AA is good. The bank's portion of small loans to businesses made in low-income geographies is less than the percentage of businesses in low-income geographies. The bank's portion of small loans to businesses made in moderate-income geographies is near to the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in low-income geographies is less than its overall small loans to businesses market share. NCB's small loans to businesses market share in moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the State of Pennsylvania section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were not made to the geographies in the AA. We considered loan distributions, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an adequate percentage of its loans within its AAs compared to outside its AAs. The bank made 53 percent of its home mortgage loans and 98 percent of its small loans to businesses within the Pennsylvania AAs.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is good. This conclusion is based on good home mortgage performance and excellent small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the State of Pennsylvania 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.

NCB's home purchase loan borrower distribution is good. The bank's portion of home purchase loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for low- and moderate-income families exceeds its overall home purchase market share.

NCB's home improvement loan borrower distribution is excellent. The bank's portion of home improvement loans made to low-income borrowers is less than the percentage of low-income families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share for both the low- and moderate-income borrowers is near to its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's refinance market share for low-income families exceeds its overall refinance market share. NCB's refinance market share for moderate-income families is near to its overall refinance market share.

Small Loans to Businesses

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

NCB's borrower distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses with revenues less than \$1 million exceeds the percentage of small businesses. NCB's small loans to businesses market share exceeds its overall market share. The bank made a substantial majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Pennsylvania 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.

NCB's level of CD lending had a neutral impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. The bank made six CD loans totaling \$7.8 million that directly benefited the Pittsburgh AA. These loans were noncomplex. There were five loans to four nonprofit organizations for affordable housing and one loan to a nonprofit organization that provides services to low- and moderate-income persons.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Erie AA is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Pennsylvania. In the non-metropolitan AA, the bank's performance is stronger than the bank's overall performance in Pennsylvania due to more favorable borrower distribution of home mortgage loans. In the Philadelphia AA, the bank's performance is weaker than the bank's overall performance in Pennsylvania due to less favorable borrower distribution of home mortgage loans. Refer to the Tables 1 through 13 in the State of Pennsylvania 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 Pennsylvania is rated "Needs to Improve". Based on a full-scope review, performance in the Pittsburgh AA is poor. NCB's responsiveness to the identified needs of the AAs is poor. Performance in the limited-scope AAs did not negatively impact the Investment Test rating in Pennsylvania.

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

During the evaluation period, NCB made 40 investments in the full-scope AA totaling \$1.8 million. We also considered the ongoing impact that investments made prior to the current evaluation period had within the AA. As of December 15, 2008, 11 prior period investments had a total remaining balance of \$8.9 million. NCB has a significant presence in the Pittsburgh AA as measured by deposits and branches within this AA. The volume and nature of the bank's investments demonstrate poor responsiveness to community needs relative to the bank's resources and its presence in the area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Erie and non-metropolitan AAs is not inconsistent with the bank's overall "Needs To Improve" performance under the Investment Test in Pennsylvania. Performance in the Philadelphia AA is weaker than the bank's overall performance in Pennsylvania due to the lack of any investment activity.

Performance in the limited-scope AAs is not weighted heavily in the overall conclusion for Pennsylvania. Refer to the Table 14 in the State of Pennsylvania section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Pennsylvania is rated "Outstanding". Based on a full-scope review, the bank's performance in the Pittsburgh AA is excellent. Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Pennsylvania.

Retail Banking Services

Refer to Table 15 in the State of Pennsylvania 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.

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

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the Pittsburgh AA. The bank did not open any branches in low- or moderate-income areas over the course of the evaluation period in the Pittsburgh AA. NCB closed one branch in a low-income area and one branch in a moderate income area during the examination period. The existence of other NCB branches within one mile of the closed branches minimized any adverse impact. The bank also had a net decrease of two middle- or upper-income offices during the evaluation period.

NCB's hours and services offered throughout the Pittsburgh AA were good. Services offered and hours of operation were generally consistent across the branch network and do not vary in a way that is inconvenient for residents of the AA.

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Pittsburgh AA was good and had a positive impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided was good. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing financial counseling to low- and moderate-income individuals and technical expertise to non-profit or government organizations. In Pittsburgh, eight employees provided services to twelve community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Erie, Philadelphia, and non-metropolitan AAs is not inconsistent with the bank's overall "Outstanding" performance under the Service Test in Pennsylvania.

Refer to Table 15 in the State of Pennsylvania section of Appendix D for the facts and data that support these conclusions.

State of Michigan Rating

CRA Rating for Michigan²: **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:

- Adequate geographic distribution and excellent borrower distribution of HMDA loans; excellent geographic and borrower distribution of small loans to businesses; and lending levels that reflect good responsiveness to the community credit needs;
- Adequate level of community development investments; and
- Excellent retail banking services readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Michigan

As of June 30, 2008, NCB is the fifth largest deposit taking financial institution in the State of Michigan. NCB has \$11.9 billion in deposits that represent a market share of 7.57 percent in Michigan's deposits. Of the bank's 13 rating areas; NCB's deposits in Michigan rank third and account for 12.35 percent of NCB's total deposits. NCB has 246 branch locations in its 15 defined AAs in Michigan. Primary competitors include LaSalle Bank Midwest, N.A. and Comerica Bank who are lead deposit takers with deposit market shares of 16 percent and 15 percent, respectively. Refer to the market profile for the State of Michigan in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Michigan

The Warren-Troy-Farmington Hills MD (Warren AA) was selected to receive a full-scope review. It is the largest of the bank's 15 designated AAs in Michigan based on deposit and loan volume. Within the State of Michigan, NCB has 34 percent of its deposits and 30 percent of its loans in the Warren AA. The ratings for the State of Michigan are primarily based on performance in the Warren AA. See the "Ratings" section in the Scope of Evaluation section and the table in Appendix A for more information.

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Michigan is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Warren AA is good. Performance in the limited-scope AAs did not negatively impact the Lending Test rating in Michigan.

Warren-Troy-Farmington Hills MD

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.

NCB's lending demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Warren AA. FDIC deposit market share data ranks NCB fifth in deposits with a 7 percent market share. Market data for lending ranks NCB tenth in home purchase (2.60 percent market share); thirteenth in home improvement (2.44 percent market share); and tenth in refinance (2.17 percent market share) within the AA. NCB's small business lending market share rank is twelfth (1.53 percent market share).

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is good. This conclusion is based on adequate home mortgage performance and excellent small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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.

NCB's home purchase loan geographic distribution is poor. The bank's portion of home purchase loans made in both the low- and moderate-income geographies is less than the percentage of owner occupied housing units in low- and moderate-income geographies. NCB had no home purchase market share in low-income geographies. NCB's home purchase market share in moderate-income geographies is near to its overall home purchase market share.

NCB's home improvement loan geographic distribution is good. The bank's portion of home improvement loans made in low-income geographies exceeds the percentage of owner occupied housing units in low-income geographies. The bank's portion of home improvement loans made in moderate-income geographies is near to the percentage of owner occupied

housing units in moderate-income geographies. NCB's home improvement market share in low-income geographies is less than its overall home improvement market share. NCB's home improvement market share in moderate-income geographies exceeds its overall home improvement market share.

NCB's refinance loan geographic distribution is adequate. The bank's portion of refinance loans made in both the low- and moderate-income geographies is less than the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's refinance market share in low-income geographies is significantly less than its overall refinance market share. NCB's refinance market share in moderate-income geographies is near to its overall refinance market share.

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 originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses made in low-income geographies exceeds the percentage of businesses in low-income geographies. The bank's portion of small loans to businesses made in moderate-income geographies substantially meets the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in both the low- and moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the State of Michigan section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were not made to the geographies in the AA. We considered loan distributions, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made a good percentage of its loans within its AAs compared to outside its AAs. The bank made 92 percent of its home mortgage loans and 97 percent of its small loans to businesses within the Michigan AAs.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is excellent. This conclusion is based on excellent home mortgage performance and excellent small loans to business performance.

Home Mortgage Loans

Refer to Tables 8, 9, 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.

NCB's home purchase loan borrower distribution is excellent. The bank's portion of home purchase loans made to low-income borrowers is near to the percent of low-income families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for low-income families exceeds its overall home purchase market share. NCB's home purchase market share for moderate-income families is near to its overall home purchase market share.

NCB's home improvement loan borrower distribution is excellent. The bank's portion of home improvement loans made to low-income borrowers is near to the percentage of those families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share for low-income families exceeds its overall home improvement market share. NCB's home improvement market share for moderate-income families substantially meets its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is adequate after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's refinance market share for low-income families is less than its overall refinance market share. NCB's refinance market share for moderate-income families substantially meets its overall refinance market share.

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 originations and purchases of small loans to businesses.

NCB's borrower distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses with revenues less than \$1 million substantially meets the percentage of small businesses. NCB's small loans to businesses market share exceeds its

overall market share. The bank made a substantial majority of these loans in smaller amounts.

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.

NCB's level of CD lending had a neutral impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. The bank made two CD loans totaling \$231 thousand that directly benefited this AA. These loans were noncomplex. There were two loans to a nonprofit organization for affordable housing.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Ann Arbor, Grand Rapids-Wyoming, Jackson, Kalamazoo-Portage, Monroe, Muskegon-Norton Shores, and Saginaw-Saginaw Township North AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Michigan. In the Battle Creek, Bay City, Flint, Holland-Grand Haven, Lansing-East Lansing and non-metropolitan AAs, the bank's performance is stronger than the bank's overall performance in Michigan due to more favorable geographic and/or borrower distribution of home mortgage loans and due to a high level of CD loans in the Flint AA. In the Detroit-Livonia-Dearborn AA the bank's performance is weaker than the bank's overall performance in Michigan due to less favorable borrower distribution of home mortgage loans.

Performance in limited-scope AAs did not negatively impact the Lending Test rating for Michigan. Refer to the Tables 1 through 13 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 "Low Satisfactory". Based on a full-scope review, performance in the Warren AA is poor. NCB's responsiveness to the identified needs of the Warren AA is poor because of the volume and nature of its investments. Performance in the limited-scope AAs positively impacted the Investment Test rating for the State of Michigan. Performance in the Detroit-Livonia-Dearborn AA is given significant weight in the evaluation of the bank's overall performance in the State of Michigan because the bank's presence in the area is comparable to its presence in the full-scope AA. 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, NCB made 11 investments in the full-scope AA totaling \$4.2 million. We also considered the ongoing impact that investments made prior to the current evaluation period had within the AA. As of December 15, 2008, one prior period investment had a remaining balance of \$118 thousand. The volume and nature of the bank's investments demonstrates poor responsiveness to community needs relative to the bank's resources and its presence in the AA. The bank also made investments in statewide funds prior to the current evaluation period that had the potential to impact one or more AAs. The bank could not evidence that the investments impacted any of its AAs and the investments are not given significant weight in this evaluation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Battle Creek, Detroit-Livonia-Dearborn and Grand Rapids-Wyoming AAs is stronger than the bank's overall "Low Satisfactory" performance in Michigan due to a higher volume of investments. Performance in the Flint and non-metropolitan AAs is consistent with the bank's overall performance in Michigan. Performance in the Ann Arbor, Bay City, Holland-Grand Haven, Jackson, Kalamazoo-Portage, Lansing-East Lansing, Monroe, Muskegon-Norton Shores, and Saginaw-Saginaw Township North AAs is weaker than the bank's overall performance in Michigan due to a lower volume of investments.

As described above, performance in the Detroit-Livonia-Dearborn AA is weighted heavily in the overall conclusion for Michigan. Refer to the Table 14 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Michigan is rated "Outstanding". Based on a full-scope review, the bank's performance in the Warren AA is excellent. Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Michigan

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.

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

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the Warren AA. The bank closed one branch in a moderate-income area over the course of the evaluation period in the Warren AA. NCB had a net increase of one branch in middle-income areas during the evaluation period.

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

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Warren AA was good and had a positive impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided was good. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing financial education to low- and moderate-income individuals and technical expertise to non-profit or government organizations. In the Warren AA, 11 employees provided services to 11 community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bay City, Holland-Grand Haven, Kalamazoo-Portage, and non-metropolitan AAs is not inconsistent with the bank's overall Outstanding performance under the Service Test in Michigan. In the Ann Arbor, Battle Creek, Detroit-Livonia-Dearborn, Flint, Grand Rapids-

Wyoming, Jackson, Lansing-East Lansing, Monroe, Muskegon-Norton Shores, and Saginaw-Saginaw Township North AAs, the bank's performance is weaker than the bank's overall performance in Michigan due to weaker branch distribution.

Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Michigan. Refer to Table 15 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

Chicago-Naperville-Joliet (IL-IN-WI) Multistate MSA Rating

CRA rating for the MMSA³: 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 include:

- Excellent geographic distribution and poor borrower distribution of HMDA loans; adequate geographic distribution and excellent borrower distribution of small loans to businesses; and lending levels that reflect adequate responsiveness to the community credit needs;
- Adequate level of community development investments; and
- Good retail banking services accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Chicago-Naperville-Joliet, IL-IN-WI MMSA

As of June 30, 2008, NCB is the fifth largest deposit taking financial institution in the Chicago-Naperville-Joliet MMSA (Chicago MMSA). NCB has deposits totaling \$11.8 billion that represent a market share of 4.33 percent in the Chicago MMSA's deposits. Of the bank's 13 rating areas, NCB deposits in the Chicago MMSA rank fourth and account for 12.27 percent of NCB's total deposits. NCB has 131 branch locations in its three defined AAs in the Chicago MMSA. Primary competitors include JP Morgan Chase, N.A. who is lead deposit taker and LaSalle Bank, N.A. (nka Bank of America, N.A.) with deposit market shares of 14.91 percent and 10.85 percent, respectively. Refer to the market profile for the Chicago MMSA in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Chicago-Naperville-Joliet MMSA

The Chicago-Naperville-Joliet, IL MD (Chicago AA) was selected to receive a full-scope review. It is the largest of the bank's three designated AAs in the Chicago MMSA based on deposit and loan volume. Within the Chicago MMSA, NCB has 69 percent of its deposits and 87 percent of its loans in the Chicago AA. The ratings are primarily based on performance in the Chicago AA. See the "Ratings" section in the Scope of Evaluation section and the table in Appendix A for more information.

³ This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Chicago MMSA is "Low Satisfactory". Based on a full-scope review, the bank's performance in the Chicago AA is good. Performance in the limited-scope AAs did not negatively impact the Lending Test rating in the Chicago MMSA.

Chicago AA

Lending Activity

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

NCB's lending demonstrates adequate responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Chicago AA. FDIC deposit market share data ranks NCB fifth in deposits with a 4.33 percent market share. Market data for lending ranks NCB seventh in home purchase (3.61 percent market share); fifteenth in home improvement (1.47 percent market share); and eighth in refinance (2.13 percent market share) within the AA. NCB's small business lending market share rank is sixteenth (.56 percent market share).

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is good. This conclusion is based on excellent home mortgage performance and adequate small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Multistate Chicago 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.

NCB's home purchase loan geographic distribution is excellent. The bank's portion of home purchase loans made in both the low- and moderate-income geographies exceeds the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's home purchase market share in low-income geographies exceeds its overall home purchase market share. NCB's home purchase market share in moderate-income geographies is near to its overall home purchase market share.

NCB's home improvement loan geographic distribution is good. The bank's portion of home improvement loans made in both the low- and moderate-income geographies exceeds the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's home improvement market share in both the low- and moderate-income geographies is less than its overall home improvement market share.

NCB's refinance loan geographic distribution is good. The bank's portion of refinance loans made in low-income geographies exceeds the percentage of owner occupied housing units in low-income geographies. The bank's portion of refinance loans made in moderate-income geographies is less than the percentage of owner occupied housing units in moderate-income geographies. NCB's refinance market share in both the low- and moderate-income geographies is less than its overall refinance market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate Chicago section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is adequate. The bank's portion of small loans to businesses made in both the low- and moderate-income geographies is less than the percentage of businesses in low- and moderate-income geographies. NCB's small loans to businesses market share in low-income geographies exceeds its overall small loans to businesses market share. The bank's small loans to businesses market share in moderate-income geographies is near to its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the Multistate Chicago section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were not made to the geographies in the AA. We considered loan distributions, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an excellent percentage of its loans within its AA compared to outside its AA. The bank made 98 percent of its home mortgage lending and 97 percent of its small loans to businesses within the Chicago AA.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is adequate. This conclusion is based on poor home mortgage performance and excellent small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Multistate Chicago 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.

NCB's home purchase loan borrower distribution is adequate. The bank's portion of home purchase loans made to low-income borrowers is substantially less than the percentage of low-income families and is poor after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share to both the low- and moderate-income families exceeds its overall home purchase market share.

NCB's bank's home improvement loan borrower distribution is poor. The bank's portion of home improvement loans made to low-income borrowers is substantially less than the percentage of low-income families and is poor after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers is less than the percentage of moderate-income families. NCB's home improvement market share for low-income families is less than its overall home improvement market share. NCB's home improvement market share for moderate-income families is significantly less than its overall home improvement market share.

NCB's refinance loan borrower distribution is poor. The bank's portion of refinance loans made to low-income borrowers is substantially less than the percentage of low-income families; and is poor after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income borrowers is near to the percentage of moderate-income families. NCB's refinance market share for low-income families is less than its overall refinance market share. NCB's refinance market share for moderate-income families is near to its overall refinance market share.

Small Loans to Businesses

Refer to Table 11 in the Multistate Chicago section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

NCB's borrower distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses with revenues less than \$1 million exceeds the percentage of small businesses. In addition, NCB's small business market share exceeds its overall small loans to businesses market share. The bank made a substantial majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1 Lending Volume in the Multistate Chicago section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

NCB's level of CD lending had a neutral impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. The bank made eight CD loans totaling \$28 million that directly benefited the AA. These loans had little to no complexity. There were five loans to nonprofits for affordable housing, two loans to one nonprofit organization for revitalization/stabilization of low- and moderate-income area, and one loan for economic development and financing small businesses.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women businesses and other small businesses and utilizes government small business programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Gary and Lake County-Kenosha County AAs is stronger than the bank's overall "Low Satisfactory" performance in the Chicago AA due to a more favorable borrower distribution of home mortgage loans. Refer to the Tables 1 through 13 in the Multistate Chicago 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 the Chicago MMSA is rated "Low Satisfactory". Based on a full-scope review, performance in the Chicago AA is adequate. NCB's responsiveness to the identified needs of the AAs is adequate. Performance in the limited-scope AAs did not negatively impact the Investment Test rating in the Chicago MMSA.

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

During the evaluation period, NCB made 30 investments in the full-scope AA totaling \$18.9 million. We also considered the ongoing impact that investments made prior to the current evaluation period had within the AA. As of December 15, 2008, seven prior period investments had a total remaining balance of \$6.1 million. The bank's responsiveness to the community development needs in the AA, as demonstrated by the volume and nature of its investments, is adequate.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Gary and the Lake County-Kenosha County AAs is weaker than the bank's overall "Low Satisfactory" performance under the Investment Test in the Chicago MMSA due to a lower level of investments.

Performance in the limited-scope AAs is not weighted heavily in the overall conclusion for the Chicago MMSA. Refer to the Table 14 in the Multistate section of Appendix D for the facts and data that support these conclusions related to the Chicago MMSA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the Chicago MMSA is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Chicago AA is good. Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for the Chicago MMSA.

Retail Banking Services

Refer to Table 15 in the Multistate Chicago 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.

NCB's delivery systems were reasonably accessible to individuals and geographies of different income levels in the Chicago AA. Access to branches in low-income areas was poor and was adequate in moderate-income areas.

NCB's record of opening and closing branch offices has improved the accessibility of delivery systems in the Chicago AA. The bank opened two branches in low-income areas over the course of the evaluation period in the Chicago AA. No branches were closed in low- or moderate-income areas during the evaluation period. NCB had a net increase of nine branches in middle- and upper-income areas.

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

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Chicago AA was good and had a positive impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided was good. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing financial education and counseling to low- and moderate-income individuals and technical expertise to non-profit or government organizations. In the Chicago AA, 17 employees provided services to 18 community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Lake County-Kenosha County AA is not inconsistent with the bank's overall High Satisfactory performance under the Service Test in Chicago-Naperville-Joliet, IL-IN-WI. In the Gary AA, the bank's performance is weaker than the bank's overall performance in the MMSA due to weaker branch distribution.

Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for the Chicago-Naperville-Joliet MMSA. Refer to Table 15 in the Multistate Chicago section of Appendix D for the facts and data that support these conclusions.

Cincinnati-Middletown (OH-KY-IN) Multistate MSA Rating

CRA rating for the MMS⁴:	<u>Satisfactory</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Low Satisfactory</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Good geographic distribution and good borrower distribution of HMDA loans; and good geographic distribution and excellent borrower distribution of small loans to businesses; and lending levels that reflect good responsiveness to the community credit needs;
- Adequate level of community development investments; and
- Good retail banking services accessible to geographies and individuals of different income levels.

Description of Institution’s Operations in Cincinnati-Middletown, OH-KY-IN MMSA

As of June 30, 2008, NCB is the third largest deposit taking institution in the Cincinnati-Middletown MMSA. NCB has \$2.9 billion in deposits that represent a market share of 5.19 percent in the Cincinnati-Middletown MMSA’s deposits. Of the bank’s 13 rating areas, the Cincinnati-Middletown MMSA ranks eighth and accounts for 3.02 percent of NCB’s total deposits. NCB has 66 branch locations within the Cincinnati-Middletown MMSA. Primary competitors include Fifth Third Bank and US Bank, N.A. who are lead deposit takers with deposit market shares of 33 percent and 29 percent, respectively. Refer to the market profile for the Cincinnati-Middleton MMSA in Appendix C for detailed demographics and other performance context information.

Scope of Evaluation in Cincinnati-Middletown MMSA

The ratings are based on performance in the Cincinnati-Middletown MMSA. See the “Ratings” section in the Scope of Evaluation section and the table in Appendix A for more information.

⁴ This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Cincinnati-Middletown MMSA is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Cincinnati-Middletown MMSA is good.

Lending Activity

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

NCB's lending demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Cincinnati-Middletown MMSA. FDIC deposit market share data ranks NCB third in deposits with a 5.19 percent market share. Market data for lending ranks NCB seventh in home purchase (4.13 percent market share); sixth in home improvement (5.70 percent market share); and seventh in refinance (3.25 percent market share) within the AA. NCB's small business lending market share rank is twelfth (1.73 percent market share).

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is good. This conclusion is based on excellent home mortgage performance and good small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Multistate Other 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.

NCB's home purchase loan geographic distribution is excellent. The bank's portion of home purchase loans made in low-income geographies exceeds the percentage of owner occupied housing units in low-income geographies. The bank's portion of home purchase loans made in moderate-income geographies substantially meets the percentage of owner occupied housing units in moderate-income geographies. NCB's home purchase market share in low-income geographies is near to its overall home purchase market share. NCB's home purchase market share in moderate-income geographies exceeds its overall home purchase market share.

NCB's home improvement loan geographic distribution is good. The bank's portion of home improvement loans made in low-income geographies exceeds the percentage of owner occupied housing units in low-income geographies. The bank's portion of home improvement loans made in moderate-income geographies is near to the percentage of owner occupied housing units in moderate-income geographies. NCB's home improvement market share in low-income geographies is near to its overall home improvement market share. NCB's home

improvement market share in moderate-income geographies substantially meets its overall home improvement market share.

NCB's refinance loan geographic distribution is good. The bank's portion of refinance loans made in both the low- and moderate-income geographies is near to the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's refinance market share in low-income geographies is near to its overall refinance market share. NCB's refinance market share in moderate-income geographies substantially meets its overall refinance market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate Other section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is good. The bank's portion of small loans to businesses made in low-income geographies substantially meets the percentage of businesses in low-income geographies. The portion of small loans to businesses made in moderate-income geographies is near to the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in both the low-and moderate-income geographies exceed its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the Multistate Other section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not analyzed; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were not made to the geographies in the AA. We considered loan distributions, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an excellent percentage of its loans within its AA compared to outside its AA. The bank made 96 percent of its home mortgage loans and 99 percent of its small loans to businesses within the Cincinnati-Middletown MMSA.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is good. This conclusion is based on good home mortgage performance and excellent small loans to business performance.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Multistate Other 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.

NCB's home purchase loan borrower distribution is excellent. The bank's portion of home purchase loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for both the low- and moderate-income families exceeds its overall home purchase market share.

NCB's home improvement loan borrower distribution is good. The bank's portion of home improvement loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share for low-income families is near to its overall home improvement market share. NCB's home improvement market share to moderate-income families exceeds its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's refinance market share for low-income families exceeds its overall refinance market share. NCB's refinance market share to moderate-income families is near its overall refinance market share.

Small Loans to Businesses

Refer to Table 11 in the Multistate Other section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

NCB's borrower distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses with revenues less than \$1 million substantially meets the percentage of small businesses. NCB's small loans to businesses market share exceeds its overall market share. The bank made a majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1 Lending Volume in the Multistate Other section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

NCB's level of CD lending had a positive impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. The bank made 15 CD loans totaling \$34 million that directly benefited the AA. These loans were noncomplex. There were five loans to nonprofits for affordable housing, five loans to four nonprofit organizations for revitalization/stabilization of low- and moderate-income neighborhoods, and five loans to three nonprofits that provide services to low- and moderate-income persons.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the Cincinnati-Middletown MMSA is rated "Low Satisfactory". Based on a full-scope review, performance in the Cincinnati AA is adequate. NCB's responsiveness to the identified needs of the AA is adequate.

Refer to Table 14 in the Multistate Other section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the Cincinnati-Middletown MMSA.

During the evaluation period, NCB made 33 investments in the full-scope AA totaling \$5.5 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on three prior period investments as of December 15, 2008, was \$2 million. The bank's responsiveness to the community development needs in the AA, as demonstrated by the volume and nature of the bank's investments, is adequate.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the Cincinnati-Middletown MMSA is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Cincinnati-Middletown MMSA is good.

Retail Banking Services

Refer to Table 15 in the Multistate Other 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.

NCB's delivery systems were accessible to individuals and geographies of different income levels in the Cincinnati-Middletown MMSA. Access to branches in low-income areas was adequate and was excellent in moderate-income areas.

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the Cincinnati-Middletown MMSA. The bank opened one branch in a moderate-income area over the course of the evaluation period in the Cincinnati-Middletown MMSA. There were no branch closings in low- or moderate-income areas; however, one branch was closed in a tract with no income data available. NCB had a net increase of thirteen branches in middle- and upper-income areas.

NCB's hours and services offered throughout the Cincinnati-Middletown MMSA were good. Services offered and hours of operation were consistent across the branch network.

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Cincinnati-Middletown MMSA was excellent and had a positive impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided was excellent. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies.

These services involved providing financial education counseling to low- and moderate-income individuals, helped low- and moderate-income individuals prepare their tax return and provided technical expertise to non-profit or government organizations. In the Cincinnati-Middletown AA, 15 employees provided services to 15 community organizations.

Huntington-Ashland, WV-KY-OH Multistate MSA Rating

CRA rating for the MMSA	<u>Outstanding</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Outstanding</u>
The service test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- Excellent geographic distribution and good borrower distribution of HMDA loans; and excellent geographic distribution and borrower distribution of small loans to businesses; and lending levels that reflect good responsiveness to the community credit needs;
- Excellent level of community development investments; and
- Excellent retail banking services readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Huntington-Ashland, WV-KY-OH MMSA

As of June 30, 2008, NCB is the largest deposit taking institution in the Huntington-Ashland MMSA. NCB has deposits totaling \$386.7 million that represent a market share of 9.91 percent in Huntington-Ashland MMSA's deposits. Of the bank's 13 rating areas, the Huntington-Ashland MMSA ranks thirteenth in deposits with market share of .40 percent of NCB's total deposits. NCB has 11 branch locations within the Huntington-Ashland MMSA. Primary competitors include City National Bank of West Virginia, Huntington Federal Savings Bank, and JP Morgan Chase, N.A., with deposit market shares of 8.64 percent, 8.26 percent, and 8.03 percent, respectively. Refer to the market profile for the Huntington-Ashland MMSA in Appendix C for detailed demographics and other performance context information.

Scope of Evaluation in Huntington-Ashland MMSA

The ratings are based on performance in the Huntington-Ashland MMSA. See the "Ratings" section in the Scope of Evaluation section and the table in Appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Huntington-Ashland MMSA is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Huntington-Ashland MMSA is good.

Lending Activity

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

NCB's lending demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Huntington-Ashland MMSA. FDIC deposit market share data ranks NCB first in deposits with a 9.91 percent market share. Market data for lending ranks NCB third in home purchase (7.71 percent market share), third in home improvement (7.49 percent market share), and fourth in refinance (6.00 percent market share) within the AA. NCB's small business lending market share rank is eighth (3.79 percent market share).

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is excellent. This conclusion is based on excellent home mortgage performance and excellent small loans to business performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Multistate Other 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.

NCB's home purchase loan geographic distribution is good. The AA has no low-income geographies. The bank's portion of home purchase loans made in moderate-income geographies exceeds the percentage of owner occupied housing units in moderate-income geographies. NCB's home purchase market share in moderate-income geographies is less than its overall home purchase market share.

NCB's home improvement loan geographic distribution is excellent. The bank's portion of home improvement loans made in moderate-income geographies exceeds the percentage of owner occupied housing units in moderate-income geographies. NCB's home improvement market share in moderate-income geographies exceeds its overall home improvement market share.

NCB's refinance loan geographic distribution is excellent. The bank's portion of refinance loans made in moderate-income geographies exceeds the percentage of owner occupied

housing units in moderate-income geographies. NCB's refinance market share in moderate-income geographies exceeds its overall refinance market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate Other section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses made in moderate-income geographies exceeds the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the Multistate Other section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were not made to the geographies in the AA. We considered loan distributions, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an excellent percentage of its loans within its AA compared to outside its AA. The bank made 100 percent of its home mortgage lending and 100 percent of its small loans to businesses within the Huntington-Ashland MMSA. See the "Other Information" section of the PE for detail on how the analysis was performed.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is good. This conclusion is based on good home mortgage performance and excellent small loans to business performance.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Multistate Other 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.

NCB's home purchase loan borrower distribution is good. The bank's portion of home purchase loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is adequate after taking into consideration the high percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for both the low- and moderate-income families exceeds its overall home purchase market share.

NCB's home improvement loan borrower distribution is good. The bank's portion of home improvement loans made to low-income borrowers is less than the percent of low-income families; however, performance is excellent after taking into consideration the high percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share for low-income families exceeds its overall home improvement market share. NCB's home improvement market share for moderate-income families is near to its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percent of low-income families; however, performance is adequate after taking into consideration the high percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's refinance market share for low-income families exceeds its overall refinance market share. NCB's refinance market share for moderate-income families is less than its overall refinance market share.

Small Loans to Businesses

Refer to Table 11 in the Multistate Other section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

NCB's borrower distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses with revenues less than \$1 million exceeds the percentage of small businesses. NCB's small loans to businesses market share exceeds its overall market share. The bank made a substantial majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1 Lending Volume in the Multistate Other section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

NCB's level of CD lending had a neutral impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. The volume of community development activities was low and dollars were adequate. The

bank made two CD loans totaling \$2 million that directly benefited the Huntington AA. These loans were noncomplex. There were two loans to one nonprofit that provides services to low- and moderate-income persons.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the Huntington-Ashland MMSA is rated "Outstanding". Based on a full-scope review, performance in the Huntington-Ashland MMSA is excellent. NCB's responsiveness to the identified needs of the AA is excellent, especially in the area of affordable housing.

Refer to Table 14 in the Multistate Other section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the Huntington-Ashland MMSA.

During the evaluation period, NCB made two investments in the full-scope AA totaling \$3.7 million. Based upon the bank's limited presence in the area and the responsiveness of the investments to an identified community need for affordable housing, the bank's investments demonstrate excellent responsiveness.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the Huntington-Ashland MMSA is rated "Outstanding". Based on a full-scope review, the bank's performance in the Huntington-Ashland MMSA is excellent.

Retail Banking Services

Refer to Table 15 in the MultiState Other 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.

NCB's delivery systems were readily accessible to individuals and geographies of different income levels in the Huntington-Ashland MMSA. There are no low-income areas in the AA. Access to branches in moderate-income areas was excellent.

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the Huntington-Ashland MMSA. The bank did not open or close any branches in moderate-income areas over the course of the evaluation period in the Huntington-Ashland MMSA.

NCB's hours and services offered throughout the Huntington-Ashland MMSA were good. Services offered and hours of operation were consistent across the branch network.

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Huntington-Ashland MMSA was adequate and had a neutral impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided was adequate. A bank employee was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing technical expertise to non-profit or government organizations. In the Huntington-Ashland MMSA, one employee provided services to two community organizations.

Louisville-Jefferson County, KY-IN Multistate MSA Rating

CRA rating for the MMSA ⁵: **Satisfactory**

The lending test is rated: **High Satisfactory**

The investment test is rated: **High Satisfactory**

The service test is rated: **Outstanding**

The major factors that support this rating include:

- Adequate geographic distribution and excellent borrower distribution of HMDA loans; and excellent geographic distribution and good borrower distribution of small loans to businesses; and lending levels that reflect good responsiveness to the community credit needs;
- Good level of community development investments; and
- Excellent retail banking services readily accessible to geographies and individuals of different income levels.

Description of Institution’s Operations in Louisville-Jefferson County MMSA

As of June 30, 2008, NCB is the largest deposit taking institution in the Louisville-Jefferson County MMSA. NCB has deposits totaling \$4 billion that represent an 18.79 percent market share in Louisville-Jefferson County MMSA’s deposits. Of the bank’s 13 rating areas, the Louisville-Jefferson County MMSA rating area ranks seventh and accounts for 4.17 percent of NCB’s total deposits. NCB has 62 branch locations within the Louisville-Jefferson County MMSA. Primary competitors include JP Morgan Chase, N.A., and PNC, N.A. with deposit market shares of 13 percent and 10 percent, respectively. Refer to the market profile for the Louisville-Jefferson County MMSA in Appendix C for detailed demographics and other performance context information.

Scope of Evaluation in Louisville-Jefferson County MMSA

The ratings are based on performance in the Louisville-Jefferson County MMSA. See the “Ratings” section in the Scope of Evaluation section and the table in appendix A for more information.

⁵ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Louisville-Jefferson County MMSA is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Louisville-Jefferson County MMSA is good.

Lending Activity

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

NCB's lending demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Louisville-Jefferson County MMSA. FDIC deposit market share data ranks NCB first in deposits with an 18.79 percent market share. Market data for lending ranks NCB fifth in home purchase (4.81 percent market share), fourth in home improvement (6.41 percent market share), and sixth in refinance (3.97 percent market share) within the AA. NCB's small business lending market share rank is ninth (2.93 percent market share). The lower lending market share reflects a high number of competitors in the AA.

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is good. This conclusion is based on adequate home mortgage performance and excellent small loans to business performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Multistate Other 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.

NCB's home purchase loan geographic distribution is adequate. The bank's portion of home purchase loans made in low-income geographies is significantly less than the percentage of owner occupied housing units in low-income geographies. The bank's portion of home purchase loans made in moderate-income geographies substantially meets the percentage of owner occupied housing units in moderate-income geographies. NCB's home purchase market share in low-income geographies is significantly less than its overall home purchase market share. NCB's home purchase market share in moderate-income geographies exceeds its overall home purchase market share.

NCB's home improvement loan geographic distribution is excellent. The bank's portion of home improvement loans made in both the low- and moderate-income geographies exceeds the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's home improvement market share in both the low- and moderate-income geographies exceeds its overall home improvement market share.

NCB's refinance loan geographic distribution is adequate. The bank's portion of refinance loans made in low-income geographies is significantly less than the percentage of owner occupied housing units in low-income geographies. The bank's portion of refinance loans made in moderate-income geographies is near to the percentage of owner occupied housing units in moderate-income geographies. NCB's refinance market share in low-income geographies is substantially less than the bank's overall refinance market share. NCB's refinance market share in moderate-income geographies substantially meets its overall refinance market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate Other section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses made in both the low- and moderate-income geographies exceeds the percentage of businesses in low- and moderate-income geographies. NCB's small loans to businesses market share in both the low- and moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the Multistate Other section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were not made to the geographies in the AA. We considered loan distributions, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an excellent percentage of its loans within its AA compared to outside its AA. The bank made 94 percent of its home mortgage lending and 97 percent of its small loans to businesses within the Louisville-Jefferson County MMSA.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is good. This conclusion is based on excellent home mortgage performance and good small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Multistate Other 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.

NCB's home purchase loan borrower distribution is excellent. The bank's portion of home purchase loans made to low-income borrowers is less than the percentage of low-income families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for both the low- and moderate-income families exceeds its overall home purchase market share.

NCB's home improvement loan borrower distribution is excellent. The bank's portion of home improvement loans made to low-income borrowers substantially meets the percentage of low-income families. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share of loans for both the low- and moderate-income families exceeds its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's refinance market share for both the low- and moderate-income families exceeds its overall refinance market share.

Small Loans to Businesses

Refer to Table 11 in the Multistate Other section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

NCB's borrower distribution of small loans to businesses is good. The bank's portion of small loans to businesses with revenues less than \$1 million is near to the percentage of small businesses. NCB's small loans to businesses market share exceeds its overall market share. The bank made a majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1 Lending Volume in the Multistate-Other section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

NCB's level of CD lending had a positive impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. The bank made 17 CD loans totaling \$33 million that directly benefited the Louisville AA. These loans had little to no complexity. There were nine loans to eight nonprofit organizations for affordable housing, three loans to nonprofits for revitalization/stabilization of low- and moderate-income neighborhoods, four loans to three nonprofit organizations that provide services to low- and moderate-income persons, and one loan to a nonprofit organization that supports economic development by financing small businesses.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test performance in the Louisville-Jefferson County MMSA is rated "High Satisfactory". Based on a full-scope review, performance in the Louisville-Jefferson County MMSA is good. NCB's responsiveness to the identified needs of the AA is good, especially in the area of affordable housing.

Refer to Table 14 in the Multistate Other section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the Louisville-Jefferson County MMSA.

During the evaluation period, NCB made 31 investments in the full-scope AA totaling \$12.2 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on 11 prior period investments as of December 15, 2008, was \$13.8 million. The volume and nature of the bank's investments demonstrate good responsiveness to the community development needs in the AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the Louisville-Jefferson County MMSA is rated "Outstanding". Based on a full-scope review, the bank's performance in the Louisville-Jefferson County MMSA is excellent.

Retail Banking Services

Refer to Table 15 in the MultiState Other 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.

NCB's delivery systems were readily accessible to individuals and geographies of different income levels in the Louisville-Jefferson County MMSA. Access to branches in low- and moderate-income areas was excellent.

NCB's record of opening and closing branch offices improved the accessibility of delivery systems in the Louisville-Jefferson County MMSA. The bank opened one branch in a moderate-income area over the course of the evaluation period in the Louisville-Jefferson County MMSA. The bank had a net decrease of one branch in middle- and upper-income areas.

NCB's hours and services offered throughout the Louisville-Jefferson County MMSA were good. Services offered and hours of operation were consistent across the branch network.

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Louisville-Jefferson County MMSA was excellent and had a positive impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided was excellent. 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 and financial literacy training to low- and

moderate-income individuals and technical expertise to non-profit or government organizations. In the Louisville-Jefferson County MMSA, 22 employees provided services to 30 community organizations.

St. Louis, MO-IL Multistate MSA Rating

CRA rating for the MMSA⁶: **Outstanding**

The lending test is rated: **Outstanding**

The investment test is rated: **Outstanding**

The service test is rated: **Low Satisfactory**

The major factors that support this rating include:

- Good geographic distribution and good borrower distribution of both HMDA loans and small loans to businesses; and lending levels that reflect adequate responsiveness to the community credit needs. Excellent level of responsiveness of community development loans that enhanced the overall Lending Test performance;
- Excellent level of community development investments; and
- Adequate retail banking services reasonably accessible to geographies and individuals of different income levels.

Description of Institution's Operations in St. Louis, MO-IL MMSA

As of June 30, 2008, NCB is the sixth largest deposit taking institution in the St. Louis MMSA. NCB has deposits of \$2.3 billion that represent a 4.02 percent market share in St. Louis MMSA's deposits. Of the bank's 13 rating areas, the St. Louis MMSA rating area ranks tenth and accounts for 2.41 percent of NCB's total deposits. NCB has 56 branch locations within the St. Louis MMSA. Primary competitors include US Bank, N.A. and Bank of America, N.A. with deposit market shares of 18 percent and 14 percent, respectively. Refer to the market profile for the St. Louis MMSA in Appendix C for detailed demographics and other performance context information.

Scope of Evaluation in St. Louis MMSA

The ratings are based on performance in the St. Louis MMSA. See the "Ratings" section in the Scope of Evaluation section and the table in Appendix A for more information

⁶ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in St. Louis MMSA is rated "Outstanding". Based on a full-scope review, the bank's performance in the St. Louis MMSA is good.

Lending Activity

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

NCB's lending demonstrates adequate responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the St. Louis MMSA. FDIC deposit market share data ranks NCB sixth in deposits with a 4.02 percent market share. Market data for lending ranks NCB twelfth in home purchase (1.55 percent market share); sixteenth in home improvement (1.49 percent market share); and twelfth in refinance (1.41 percent market share) within the AA. NCB's small business lending market share rank is twenty-second (.42 percent market share).

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is good. This conclusion is based on good home mortgage performance and good small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Multistate Other 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.

NCB's home purchase loan geographic distribution is excellent. The bank's portion of home purchase loans made in low-income geographies is near to the percentage of owner occupied housing units in low-income geographies. The bank's portion of home purchase loans made in moderate-income geographies exceeds the percentage of owner occupied housing units in moderate-income geographies. NCB's home purchase market share in low-income geographies is significantly less than its overall home purchase market share. NCB's home purchase market share in moderate-income geographies exceeds its overall home purchase market share.

NCB's home improvement loan geographic distribution is excellent. The bank's portion of home improvement loans made in both the low- and moderate-income geographies exceeds the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's home improvement market share in low-income geographies exceeds its overall home improvement market share. The bank's home improvement market share in moderate-income geographies is near to its overall home improvement market share.

NCB's home refinance loan geographic distribution is adequate. The bank's portion of refinance loans made in both the low- and moderate-income geographies is less than the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's refinance market share in both the low- and moderate-income geographies is less than its overall refinance market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate Other section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is good. The bank's portion of small loans to businesses made in low-income geographies exceeds the percentage of businesses in low-income geographies. The bank's portion of small loans to businesses made in moderate-income geographies is less than the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in low-income geographies exceeds its overall small loans to businesses market share. NCB's small loans to businesses market share in moderate-income geographies is less than its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the Multistate Other section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were not made to the geographies in the AA. We considered loan distributions, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an excellent percentage of its loans within its AA compared to outside its AA. The bank made 97 percent of its home mortgage lending and 99 percent of its small loans to businesses within the St. Louis MMSA.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is good. This conclusion is based on good home mortgage performance and good small loans to business performance.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Multistate Other 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.

NCB's home purchase loan borrower distribution is adequate. The bank's portion of home purchase loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is adequate after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for low-income families is significantly less than its overall home purchase market share. NCB's home purchase market share for moderate-income families is less than its overall home purchase market share.

NCB's home improvement loan borrower distribution is good. The bank's portion of home improvement loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share for both the low- and moderate-income families is near to its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is adequate after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's refinance market share for both the low- and moderate-income families is less than its overall refinance market share.

Small Loans to Businesses

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

NCB's borrower distribution of small loans to businesses is good. The bank's portion of small loans to businesses with revenues less than \$1 million is near to the percentage of small businesses. NCB's small loans to businesses market share exceeds its overall market share. The bank made a majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1 Lending Volume in the Multistate Other section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table

includes all community development loans, including multifamily loans that also qualify as community development loans.

NCB's level of CD lending had a positive impact on the evaluation of its lending performance in the AA based on the number and amount of loans, the complexity of loans, and the bank's capacity within the AA. The volume, dollars, and level of complexity were excellent. Complex loans included loans where a large number of the projects were established based on specific community development incentives, such as tax abatements. These types of loans required multiple funding sources which included various government programs. These projects were governed by certain stipulations which required extensive time and project management skills. The bank made 18 CD loans totaling \$61 million that directly benefited the AA. There were seven loans to nonprofits for affordable housing, nine loans to eight nonprofit organizations for revitalization/stabilization of low- and moderate-income neighborhoods, and two loans to nonprofits that provide services to low- and moderate-income persons.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the St. Louis MMSA is rated "Outstanding". Based on a full-scope review, performance in the St. Louis MMSA is excellent. NCB's responsiveness to the identified needs of the AA is excellent, especially in the area of affordable housing.

Refer to Table 14 in the Multistate Other section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the St. Louis MMSA.

During the evaluation period, NCB made 31 investments in the full-scope AA totaling \$19.6 million. We also considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on 12 prior period investments as of December 15, 2008, was \$4.8 million. The volume and nature of the bank's investments demonstrate excellent responsiveness to the community development needs in the AA, especially the need for affordable housing.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the St. Louis, MMSA is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the St. Louis MMSA is adequate.

Retail Banking Services

Refer to Table 15 in the Multistate Other 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.

NCB's delivery systems were accessible to individuals and geographies of different income levels in the St. Louis MMSA. Access to branches in low-income areas was poor and was adequate in moderate-income areas. More weight was placed on the moderate-income performance due to the higher percentage of the population living in these tracts.

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the St. Louis MMSA. The bank opened one branch in a moderate-income area and closed one branch in a moderate-income area over the course of the evaluation period in the St. Louis MMSA. The bank also had a net increase of five branches in middle- and upper-income areas.

NCB's hours and services offered throughout the St. Louis MMSA were good. Services offered and hours of operation were consistent across the branch network.

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the St. Louis MMSA was good and had a positive impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided was good. 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 and Earned Income Tax Credit tax return preparation for low- and moderate-income individuals, and financial literacy, and technical expertise to non-profit or government organizations. In the St. Louis MMSA, eight employees provided services to twelve community organizations.

Youngstown-Warren-Boardman, OH-PA Multistate MSA Rating

CRA rating for the MMSA⁷: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Needs to Improve

The service test is rated: High Satisfactory

The major factors that support this rating include:

- Adequate geographic distribution and excellent borrower distribution of HMDA loans; excellent geographic distribution and good borrower distribution of small loans to businesses; and lending levels that reflect good responsiveness to the community credit needs;
- Poor level of community development investments; and
- Good retail banking services accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Youngstown-Warren-Boardman OH-PA MMSA

As of June 30, 2008, NCB is the second largest deposit taking institution in the Youngstown-Warren-Boardman MMSA. NCB has deposits of \$1.3 billion that represent a 15.02 percent market share in Youngstown-Warren-Boardman's deposits. Of the bank's 13 rating areas, the Youngstown-Warren-Boardman MMSA ranks twelfth and accounts for 1.33 percent of NCB's total deposits. NCB has 25 branch locations within the Youngstown-Warren-Boardman MMSA. Primary competitors include Huntington National Bank who is lead deposit-taker and First Place Bank with deposit market shares of 20.87 percent and 14.51 percent, respectively. Refer to the market profile for the Youngstown-Warren-Boardman MMSA in Appendix C for detailed demographics and other performance context information.

Scope of Evaluation in Youngstown-Warren-Boardman MMSA

The ratings are based on performance in the Youngstown-Warren-Boardman MMSA. See the "Ratings" section in the Scope of Evaluation section and the table in Appendix A for more information.

⁷ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Youngstown-Warren-Boardman MMSA is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Youngstown-Warren-Boardman MMSA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the Multistate Other section in Appendix D for the facts and data used to evaluate the bank's lending activity.

NCB's lending demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Youngstown-Warren-Boardman MMSA. FDIC deposit market share data ranks NCB second in deposits with a 15.02 percent market share. Market data for lending ranks NCB seventh in home purchase (4.74 percent market share), seventh in home improvement (3.78 percent market share), and eighth in refinance (4.21 percent market share) within the AA. NCB's small business lending market share rank is eighth (3.67 percent market share). The lower lending market share reflects a high number of competitors in the AA.

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is adequate. This conclusion is based on adequate home mortgage performance and excellent small loans to business performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Multistate Other 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.

NCB's home purchase loan geographic distribution is poor. The bank's portion of home purchase loans made in both the low- and moderate-income geographies is significantly less than the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's home purchase market share in low-income geographies exceeds its overall home purchase market share. NCB's home purchase market share in moderate-income geographies is less than its overall home purchase market share.

NCB's home improvement loan geographic distribution is excellent. The bank's portion of home improvement loans made in low-income geographies exceeds the percentage of owner occupied housing units in low-income geographies. The bank's portion of home improvement loans made in moderate-income geographies substantially meets the percentage of owner occupied housing units in moderate-income geographies. NCB's home improvement market share in low-income geographies exceeds its overall home improvement market share.

NCB's home improvement market share in moderate-income geographies is near to its overall home improvement market share.

NCB's refinance loan geographic distribution is poor. The bank's portion of refinance loans made in low income geographies is substantially less than the percentage of owner occupied housing units in low-income geographies. The bank's portion of refinance loans made in moderate-income geographies is significantly less than the percentage of owner occupied housing units in moderate-income geographies. NCB's refinance market share in low-income geographies is less than its overall refinance market share. NCB's refinance market share in moderate-income geographies is significantly less than its overall refinance market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate Other section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is excellent. The bank's portion of small loans to businesses made in low-income geographies is near to the percentage of businesses in low-income geographies. The bank's portion of small loans to businesses made in moderate-income geographies exceeds the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in both the low- and moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the Multistate Other section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were not made to the geographies in the AA. We considered loan distributions, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an excellent percentage of its loans within its AA compared to outside its AA. The bank made 100 percent of its home mortgage lending and 100 percent of its small loans to businesses within the Youngstown-Warren-Boardman MMSA.

Distribution of Loans by Income Level of the Borrower

NCB's overall geographic distribution is excellent. This conclusion is based on excellent home mortgage and good small loans to business performance.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Multistate Other 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.

NCB's home purchase loan borrower distribution is excellent. The bank's portion of home purchase loans made to low-income borrowers is less than the percentage of low-income families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for both the low- and moderate-income families exceeds its overall home purchase market share.

NCB's home improvement loan borrower distribution is excellent. The bank's portion of home improvement loans made to low-income borrowers is less than the percentage of low-income families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share for low-income families exceeds its overall home improvement market share. NCB's market share for moderate-income families is near to its overall home improvement market share.

NCB's refinance loan borrower distribution is excellent. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's refinance market share for low-income borrowers substantially meets its overall refinance market share. NCB's refinance market share for moderate-income families meets its overall refinance market share.

Small Loans to Businesses

Refer to Table 11 in the Multistate Other section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

NCB's borrower distribution of small loans to businesses is good. The bank's portion of small loans to businesses with revenues less than \$1 million is near to the percentage of small businesses. NCB's small loans to businesses market share exceeds its overall market share. The bank made a majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1 Lending Volume in the “Multistate Other” section of Appendix D for the facts and data used to evaluate the bank’s level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

NCB’s level of CD lending had a positive impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank’s capacity within the AA. The bank made three CD loans totaling \$2.2 million that directly benefited the Youngstown AA. These loans were noncomplex. There were two loans to nonprofits for affordable housing and one loan to a nonprofit that provides services to low- and moderate-income persons.

Product Innovation and Flexibility

NCB’s flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

National City’s overall Investment Test performance in the Youngstown-Warren-Boardman MMSA is rated “Needs to Improve”. Based on a full-scope review, performance in the Youngstown-Warren-Boardman MMSA is poor. NCB’s responsiveness to the identified needs of the AA is poor.

Refer to Table 14 in the Multistate Other section of Appendix D for the facts and data used to evaluate the bank’s level of qualified investments in the Youngstown-Warren-Boardman MMSA.

During the evaluation period, NCB made one investment in the full-scope AA totaling \$5 thousand. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on one prior period investment as of December 15, 2008, was \$3 million. The small number and low dollar amount of investments by NCB reflects poor responsiveness based upon the community development needs in the AA and the bank’s resources.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the Youngstown-Warren-Boardman MMSA is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Youngstown-Warren-Boardman MMSA is good.

Retail Banking Services

Refer to Table 15 in the Multistate Other 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.

NCB's delivery systems were accessible to individuals and geographies of different income levels in the Youngstown-Warren-Boardman MMSA. Access to branches in low-income areas was excellent and was adequate in moderate-income areas.

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the Youngstown-Warren-Boardman MMSA. The bank did not open any branches in low- or moderate-income areas over the course of the evaluation period in the Youngstown-Warren-Boardman MMSA. NCB closed one moderate-income branch during the evaluation period. The existence of another NCB branch less than two miles away and a drive-up facility within one mile of the closed branch minimized any adverse impact. The bank also had a net increase of one middle- or upper-income office during the evaluation period.

NCB's hours and services offered throughout the Youngstown-Warren-Boardman MMSA were good. Services offered and hours of operation were consistent across the branch network.

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Youngstown-Warren-Boardman MMSA was adequate and had a neutral impact on the Service Test performance. The CD services in

the full scope AA were responsive to local community development needs and the volume of services provided was adequate. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing and technical expertise to non-profit or government organizations. In the Youngstown-Warren-Boardman MMSA, three employees provided services to five community organizations.

State of Florida Rating

CRA Rating for Florida⁸:	<u>Satisfactory</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Needs to Improve</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Excellent geographic distribution of HMDA loans and adequate borrower distribution of HMDA loans; good geographic distribution and borrower distribution of small loans to businesses; and lending levels that reflect adequate responsiveness to community credit needs;
- Poor level of community development investments; and
- Good retail banking services accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Florida

As of June 30, 2008, NCB is the eleventh largest deposit taking financial institution in the State of Florida. NCB has \$5.4 billion in deposits that represent a 1.41 percent market share in Florida's deposits. Of the bank's 13 rating areas, NCB's deposits in Florida rank sixth and account for 5.58 percent of NCB's total deposits. NCB has 109 branch locations in its 11 defined AAs in Florida. Primary competitors include Wachovia Bank, N.A. and Bank of America, N.A. that both lead the market with deposit market shares of 19 percent and 18 percent, respectively. Refer to the market profile for the State of Florida in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Florida

The West Palm Beach-Boca Raton-Boynton Beach MD (West Palm Beach AA) was selected to receive a full-scope review. It is the largest of the bank's 11 designated AAs in Florida based on deposit volume. Within the State of Florida, NCB has 50 percent of its deposits and 16 percent of its loans in the West Palm Beach AA. The ratings are primarily based on

⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

performance in the West Palm Beach AA. See the “Ratings” section in the Scope of Evaluation section and the table in Appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Lending Test in Florida is rated “High Satisfactory”. Based on a full-scope review, the bank’s performance in the West Palm Beach AA is good. Performance in the limited-scope AAs did not negatively impact the Lending Test rating in Florida.

West Palm Beach AA

Lending Activity

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

NCB’s lending demonstrates adequate responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the West Palm Beach AA. FDIC deposit market share data ranks NCB third in deposits with a 7 percent market share. Market data for lending ranks NCB seventeenth in home purchase (1.03 percent market share); eleventh in home improvement (2.08 percent market share); and seventeenth in refinance (.98 percent market share) within the AA. NCB’s small businesses lending market share rank is twentieth (.13 percent market share). The lower lending market rank and share reflect that this is a new retail market for NCB and also the market contains a large number of competitors.

Distribution of Loans by Income Level of the Geography

NCB’s overall geographic distribution is excellent. This conclusion is based on excellent home mortgage performance and good small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the State of Florida 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.

NCB’s home purchase loan geographic distribution is excellent. The bank’s portion of home purchase loans made in both the low- and moderate-income geographies exceeds the percentage of owner occupied housing units in low- and moderate-income geographies. NCB’s home purchase market share in low-income geographies exceeds its overall home purchase market share. NCB’s home purchase market share in moderate-income geographies substantially meets its overall home purchase market share.

NCB's home improvement loan geographic distribution is excellent. The bank's portion of home improvement loans made in both the low- and moderate-income geographies exceeds the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's home improvement market share in both the low- and moderate-income geographies exceeds its overall home improvement market share.

NCB's refinance loan geographic distribution is good. The bank's portion of refinance loans made in low income geographies exceeds the percentage of owner occupied housing units in low-income geographies. The bank's portion of refinance loans made in moderate-income geographies is less than the percentage of owner occupied housing units in moderate-income geographies. NCB's refinance market share in low-income geographies exceeds its overall refinance market share. NCB's refinance market share in moderate-income geographies is less than its overall refinance market share.

Small Loans to Businesses

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

NCB's geographic distribution of small loans to businesses is good. The bank's portion of small loans to businesses made in low-income geographies exceeds the percentage of businesses in low-income geographies. The bank's portion of small loans to businesses made in moderate-income geographies is near to the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in both the low- and moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the State of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the 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, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an adequate of percentage of its loans within its AAs compared to outside its AAs. The bank made 57 percent of its home mortgage loans and 91 percent of its small loans to businesses within the Florida AAs.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is adequate. This conclusion is based on adequate home mortgage performance and good small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Florida 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.

NCB's home purchase loan borrower distribution is adequate. The bank's portion of home purchase loans made to low-income borrowers is substantially less than the percent of low-income families; however, after taking into consideration the percentage of households living below the poverty level, performance is poor. The bank's portion of home purchase loans made to moderate-income borrowers substantially meets the percentage of moderate-income families. NCB's home purchase market share for low-income families exceeds its overall home purchase market share. NCB's home purchase market share for moderate-income borrowers is less than its overall home purchase market share.

NCB's home improvement loan borrower distribution is adequate. The bank's portion of home improvement loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers is less than the percentage of moderate-income families. NCB's home improvement market share for low-income families exceeds its overall home improvement market share. NCB's home improvement market share for moderate-income families is significantly less than its overall home improvement market share.

NCB's refinance loan borrower distribution is poor. The bank's portion of refinance loans made to low-income borrowers is substantially less than the percentage of low-income families; however, after taking into consideration the percentage of households living below the poverty level, performance is poor. The bank's portion of refinance loans made to moderate-income borrowers is less than the percentage of moderate-income families. NCB's refinance market share for low-income families exceeds its overall refinance market share. NCB's refinance market share for moderate-income borrowers is significantly less than its overall refinance market share.

Small Loans to Businesses

Refer to Table 11 in the State of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

NCB's borrower distribution of small loans to businesses is good. The bank's portion of small loans to businesses with revenues less than \$1 million is near to the percentage of small businesses in the AA. NCB's small loans to businesses market share exceeds its overall market share. The bank made a majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Florida 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.

NCB's level of CD lending had a neutral impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. The bank made two CD loans totaling \$254 thousand that directly benefited the AA. These loans were noncomplex. There was one loan to a nonprofit for affordable housing and one loan to a nonprofit organization that supports economic development by financing a small business.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Orlando-Kissimmee, Palm Bay-Melbourne-Titusville, Sebastian-Vero Beach, and non-metropolitan AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Florida. In the Port St. Lucie AA the bank's performance is stronger than the bank's overall performance in Florida due to more favorable borrower distribution of home mortgage loans. In the Bradenton-Sarasota-Venice, Deltona-Daytona Beach-Ormond Beach, Fort Lauderdale-Pompano Beach-Deerfield Beach, Naples-Marco Island, and Palm Coast AAs the bank's performance is weaker than the bank's overall performance in Florida due to less favorable geographic and/or borrower distribution of home mortgage loans.

Performance in limited-scope AAs did not negatively impact the Lending Test rating in Florida. Refer to the Tables 1 through 13 in the State of Florida 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 the State of Florida is rated "Needs to Improve". Based on a full-scope review, performance in the West Palm Beach AA is poor. NCB's responsiveness to the identified needs of the AA is poor. Performance in the limited-scope AAs did not negatively impact the Investment Test rating in Florida.

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

During the evaluation period, NCB made 26 investments in the full-scope AA totaling \$6.4 million. The volume and nature of the bank's investments demonstrate poor responsiveness to community needs relative to the bank's resources and its presence in the area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Palm Bay-Melbourne-Titusville and Port St. Lucie AAs is not inconsistent with the bank's overall "Needs to Improve" performance under the Investment Test in Florida. Performance in the Bradenton-Sarasota-Venice, Deltona-Daytona-Ormond Beach, Fort Lauderdale-Pompano Beach-Deerfield Beach, Naples-Marco Island, Orlando-Kissimmee, Palm Coast, Sebastian-Vero Beach and non-metropolitan AAs is weaker than the bank's overall performance in Florida is due to a significantly lower level of investments.

Performance in the limited-scope AAs is not weighted heavily in the overall conclusion for Florida. Refer to the Table 14 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Florida is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the West Palm Beach AA is good. Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Florida.

Retail Banking Services

Refer to Table 15 in the State of Florida 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.

NCB's delivery systems were accessible to individuals and geographies of different income levels in the West Palm Beach AA. Access to branches in low-income areas was excellent and was adequate in moderate-income areas.

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the West Palm Beach AA. The bank did not open or close any branches in low- or moderate-income areas over the course of the evaluation period in the West Palm Beach AA. The bank had a net increase of one branch in middle- and upper-income areas.

NCB's hours and services offered throughout the West Palm Beach AA were good. Services offered and hours of operation were consistent across the branch network.

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the West Palm Beach AA was excellent and had a positive impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided was excellent. 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, financial literacy and small business seminars, and technical expertise to non-profit or government organizations. In West Palm Beach AA, twelve employees provided services to nineteen community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Fort Lauderdale-Pompano Beach-Deerfield Beach, Palm Bay-Melbourne-Titusville, and the Port

St. Lucie AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test in Florida. In the Bradenton-Sarasota-Venice, Naples-Marco Island, Orlando-Kissimee and the Sebastian-Vero Beach AAs the bank's performance is weaker than the bank's overall performance in Florida due to weaker branch distribution. In the Deltona-Daytona Beach-Ormond Beach-Deerfield Beach, Palm Coast, and non-metropolitan AAs performance is stronger than the bank's overall performance in Florida due to stronger branch distribution.

Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Florida. Refer to Table 15 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

State of Illinois Rating

CRA Rating for Illinois⁹:	<u>Satisfactory</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Needs to Improve</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Adequate geographic distribution of HMDA loans and good borrower distribution of HMDA loans; good geographic distribution and borrower distribution of small loans to businesses; and lending levels that reflect good responsiveness to the community credit needs;
- Poor level of community development investments; and
- Good retail banking services accessible to geographies and individuals of different income levels. A stronger performance in most limited scope AAs had a significant impact on the overall Service Test rating.

Description of Institution's Operations in Illinois

As of June 30, 2008, NCB is the fourth largest deposit taking financial institution in the State of Illinois. NCB has deposits of \$14.4 billion that represent a 4.17 percent market share in Illinois' deposits. Of the bank's 13 rating areas, the bank's deposits in Illinois rank ninth and account for 2.90 percent of NCB's total deposits. NCB has 45 branch locations in its eight defined AAs in Illinois. Primary competitors include J. P. Morgan Chase who leads market share and LaSalle Bank, N.A. with deposit market shares of 12 percent and 9 percent, respectively. Refer to the market profile for the State of Illinois in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Illinois

The Peoria MSA (Peoria AA) was selected to receive a full-scope review. It is the second largest of the bank's eight designated AAs in Illinois based on deposit and loan volume. Within the State of Illinois, NCB has 24 percent of its deposits and 31 percent of its loans in the Peoria MSA. The largest AA is the Chicago-Naperville-Joliet MD which is being evaluated as a multistate. The ratings are primarily based on performance in the Peoria AA. See the

⁹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

“Ratings” section in the Scope of Evaluation section and the table in Appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Lending Test in Illinois is rated “High Satisfactory”. Based on a full-scope review, the bank’s performance in the Peoria AA is good. Performance in the limited-scope AAs did not negatively impact the Lending Test rating in Illinois.

Peoria AA

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.

NCB’s lending demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Peoria AA. FDIC deposit market share data ranks NCB second in deposits with an 11 percent market share. Market data for lending ranks NCB first in home purchase (17.68 percent market share); fourth in home improvement (6.46 percent market share); and fifth in refinance (5.33 percent market share) within the AA. NCB’s small business lending market share rank is tenth (2.43 percent market share).

Distribution of Loans by Income Level of the Geography

NCB’s overall geographic distribution is adequate. This conclusion is based on adequate home mortgage performance and good small loans to business performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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.

NCB’s home purchase loan geographic distribution is adequate. The bank’s portion of home purchase loans made in low-income geographies is significantly less than the percentage of owner occupied housing units in low-income geographies. The bank’s portion of home purchase loans made in moderate-income geographies is near to the percentage of owner occupied housing units in moderate-income geographies. NCB’s home purchase market share in both the low- and moderate-income geographies is less than its overall home purchase market share.

NCB’s home improvement loan geographic distribution is excellent. The bank’s portion of home improvement loans made in both the low- and moderate-income geographies

substantially meets the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's home improvement market share in low-income geographies exceeds its overall home improvement market share. NCB's home improvement market share in moderate-income geographies is near to its overall home improvement market share.

NCB's refinance loan geographic distribution is adequate. The bank's portion of refinance loans made in low-income geographies is substantially less than the percentage of owner occupied housing units in low-income geographies. The bank's portion of refinance loans made in moderate-income geographies is less than the percentage of owner occupied housing units in moderate-income geographies. NCB's refinance market share in low-income geographies is significantly less than its overall refinance market share. NCB's refinance market share in moderate-income geographies is less than its overall refinance market share.

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 originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is good. The bank's portion of small loans to businesses made in low-income geographies exceeds the percentage of businesses in low-income geographies. The bank's portion of small loans to businesses made in moderate-income geographies is less than the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in both the low- and moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the State of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the 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, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made a good percentage of its loans within its AAs compared to outside its AAs. The bank made 87 percent of its home mortgage lending and 92 percent of its small loans to businesses within the Illinois AAs.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is good. This conclusion is based on good home mortgage performance and good small loans to business performance.

Home Mortgage Loans

Refer to Tables 8, 9, 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.

NCB's home purchase loan borrower distribution is excellent. The bank's portion of home purchase loans made to low-income borrowers is near to the percentage of low-income families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for both the low- and moderate-income families exceeds its overall home purchase market share.

NCB's home improvement loan borrower distribution is good. The bank's portion of home improvement loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is adequate after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share for low-income families is less than its overall home improvement market share. NCB's home improvement market share for moderate-income families is near to its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income families exceeds the percentage of moderate-income families. NCB's refinance market share of loans for low-income families is less than its overall refinance market share. NCB's refinance market share for moderate-income families substantially meets its overall refinance market share.

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 originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses is good. The bank's portion of small loans to businesses with revenues less than \$1 million is less than the percentage of small businesses. NCB's small loans to businesses market share exceeds its overall market share. The bank made a majority of these loans in smaller amounts.

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.

NCB's level of CD lending had a neutral impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. The bank made three CD loans totaling \$5.6 million that directly benefited the AA. These loans were noncomplex. There were two loans to one nonprofit organization that supports economic development by financing small businesses, and one loan to a nonprofit organization that provides services to low- and moderate-income persons.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Champaign-Urbana, Kanakee-Bradley, and non-metropolitan AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Illinois. In the Bloomington-Normal, Decatur, Rockford, and Springfield AAs, the bank's performance is stronger than the bank's overall performance in Illinois due to more favorable geographic and/or borrower distribution of home mortgage loans and due to a high level of CD loans in the Decatur AA.

Performance in limited-scope AAs did not negatively impact the Lending Test rating in Illinois. Refer to the Tables 1 through 13 in the State of Illinois 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 the State of Illinois is rated "Needs to Improve". Based on a full-scope review, performance in the Peoria AA is poor. NCB's

responsiveness to the identified needs of the AAs is poor. Performance in the limited-scope AAs did not negatively impact the Investment Test rating in Illinois.

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, NCB made nine investments in the Peoria AA totaling \$198 thousand. We also considered the ongoing impact that investments made prior to the current evaluation period had within the AA. As of December 15, 2008, one prior period investment had a remaining balance of \$137 thousand. The volume and nature of the bank's investments demonstrates poor responsiveness to community needs relative to the bank's resources and its presence in the area. The bank also made investments in statewide and regional funds during the evaluation period and prior to the current evaluation period that had the potential to impact one or more AAs. The bank could not evidence that the investments impacted any of its AAs and the investments are not given significant weight in this evaluation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington-Normal, Champaign-Urbana and Springfield AAs is not inconsistent with the bank's overall "Needs to Improve" performance under the Investment Test in Illinois. Performance in the Decatur and Rockford AAs is stronger than the bank's overall performance in Illinois due to a higher volume of investments. Performance in the Kankakee-Bradley and non-metropolitan AAs is weaker than the bank's overall performance in Illinois due to a significantly lower level of investments.

Performance in the limited-scope AAs is not weighted heavily in the overall conclusion for the State of Illinois. Refer to the Table 14 in the State of Illinois section of Appendix D for the facts and data that support these conclusions.

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 Peoria AA is good. The stronger performance in most limited scope AAs had a significant impact on the overall Service test rating.

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.

NCB's delivery systems were reasonably accessible to individuals and geographies of

different income levels in Peoria. Access to branches in low-income areas was excellent and was very poor in moderate-income areas.

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the Peoria AA. The bank did not open or close any branches in low- or moderate-income areas over the course of the evaluation period in the Peoria AA. The bank opened one branch during the evaluation period in a middle income area.

NCB's hours and services offered throughout the Peoria AA were good. Services offered and hours of operation were generally consistent across the branch network and do not vary in a way that is inconvenient for residents of the AA.

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Peoria AA was adequate and had a positive impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided was adequate. Bank employees were involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing technical expertise to non-profit organizations. In the Peoria AA, five employees provided services to five community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bloomington-Normal and Kankakee-Bradley AA is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test in Illinois. In the non-metropolitan AA the bank's performance is weaker than the bank's overall performance in Illinois due to weaker branch distribution in these AAs. In the Champaign-Urbana, Decatur, Rockford, and the Springfield AAs, the bank's performance is stronger than the bank's overall High Satisfactory performance due to stronger branch distribution.

The stronger performance in most limited scope AAs had a significant impact on the overall Service test rating. Refer to Table 15 in the State of Illinois section of Appendix D for the facts and data that support these conclusions.

State of Indiana Rating

CRA Rating for Indiana¹⁰: **Satisfactory**

The lending test is rated: **High Satisfactory**

The investment test is rated: **Low Satisfactory**

The service test is rated: **Low Satisfactory**

The major factors that support this rating include:

- Good geographic distribution of HMDA loans and excellent borrower distribution of HMDA loans; adequate geographic distribution and excellent borrower distribution of small loans to businesses; and lending levels that reflect good responsiveness to the community credit needs;
- Adequate level of community development investments; and
- Adequate retail banking services reasonably accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Indiana

As of June 30, 2008, NCB is the second largest deposit taking institution in the State of Indiana. NCB has deposits of \$8.4 billion that represent a 9.26 percent market share in Indiana's deposits. Of the bank's 13 rating areas, Indiana ranks fifth and accounts for 7.95 percent of NCB's total deposits. NCB has 145 branch locations in its ten defined AAs in Indiana. Primary competitors include J.P. Morgan Chase Bank, N.A., who leads in market share, and Fifth Third with deposit market shares of 13.75 percent and 6.75 percent, respectively. Refer to the market profile for the State of Indiana in Appendix C for detailed demographics and other performance context information for AAs that received a full-scope review.

Scope of Evaluation in State of Indiana

Indianapolis-Carmel MSA (Indianapolis AA) was selected to receive a full-scope review. It is the largest of the bank's ten designated AAs in Indiana based on deposit and loan volume. Within the State of Indiana, NCB has 59 percent of its deposits and 51 percent of its loans in the Indianapolis AA. The ratings are primarily based on performance in the Indianapolis AA.

¹⁰ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

See the “Ratings” section in the Scope of Evaluation section and the table in Appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Lending Test in Indiana is rated “High Satisfactory”. Based on a full-scope review, the bank’s performance in the Indianapolis AA is excellent. Performance in the limited-scope AAs did not negatively impact the Lending Test rating in Indiana.

Indianapolis AA

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.

NCB’s lending demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Indianapolis AA. FDIC deposit market share data ranks NCB fourth in deposits with a 9 percent market share. Market data for lending ranks NCB sixth in home purchase (3.33 percent market share), fourth in home improvement (5.69 percent market share), and seventh in refinance (3.36 percent market share) within the AA. In addition, NCB’s small business lending market share rank is eighth (2.79 percent market share).

Distribution of Loans by Income Level of the Geography

NCB’s overall geographic distribution is good. This conclusion is based on good home mortgage performance and adequate small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 2, 3, 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.

NCB’s home purchase loan geographic distribution is good. The bank’s portion of home purchase loans made in low-income geographies exceeds the percentage of owner occupied housing units in low-income geographies. The bank’s portion of home purchase loans made in moderate-income geographies is less than the percentage of owner occupied housing units in moderate-income geographies. NCB’s home purchase market share in low-income geographies exceeds its overall market share. NCB’s home purchase market share in moderate-income geographies substantially meets its overall home purchase market share.

NCB’s home improvement loan geographic distribution is excellent. The bank’s portion of home improvement loans made in both the low- and moderate-income geographies exceeds

the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's home improvement market share in both the low- and moderate-income geographies exceeds its overall home improvement market share.

NCB's refinance loan geographic distribution is adequate. The bank's portion of refinance loans made in both the low- and moderate-income geographies is less than the percentage of owner occupied housing units in low- and moderate-income geographies. NCB's refinance market share in low-income geographies is near to its overall refinance market share. NCB's refinance market share in moderate-income geographies substantially meets its overall refinance market share.

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 originations and purchases of small loans to businesses.

NCB's geographic distribution of small loans to businesses is adequate. The bank's portion of small loans to businesses made in low-income geographies is significantly less than the percentage of businesses in low-income geographies; however, performance is enhanced by excellent small loans to businesses market share in low-income geographies. The portion of small loans to businesses made in moderate-income geographies is near to the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in low-income geographies substantially meets its overall small loans to businesses market share. NCB's small loans to businesses market share in moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the State of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the 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, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an adequate percentage of its loans within its AAs compared to outside its AAs. The bank made 82 percent of its home mortgage lending and 92 percent of its small loans to businesses within the Indiana AAs.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is excellent. This conclusion is based on excellent home mortgage performance and excellent small loans to businesses performance.

Home Mortgage Loans

Refer to Tables 8, 9, 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.

NCB's home purchase loan borrower distribution is excellent. The bank's portion of home purchase loans made to low-income borrowers is near to the percentage of low-income families; however, performance is excellent after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share for both the low- and moderate-income families exceeds its overall home purchase market share.

NCB's home improvement loan borrower distribution is excellent. The bank's portion of home improvement loans made to low-income borrowers is near to the percentage of low-income families; however, performance is excellent after taking into consideration the percentage of household living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home improvement market share for low-income families exceeds its overall home improvement market share. NCB's home improvement market share for moderate-income families is near to its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's refinance market share for both the low- and moderate-income families exceeds its overall refinance market share.

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 originations and purchases of small loans to businesses.

NCB's borrower distribution of small loans to businesses is excellent. The performance is enhanced by exceptional market share. The bank's portion of small loans to businesses with revenues less than \$1 million is near to the percentage of small businesses. NCB's small loans to businesses market share exceeds its overall market share. The bank made a majority of these loans in smaller amounts.

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 multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

NCB's level of CD lending had a positive impact on the evaluation of its lending performance in the AA based on the number and amount of loans, and the bank's capacity within the AA. The bank made two CD loans totaling \$5.1 million that directly benefited the AA. These loans were noncomplex. There were two loans to nonprofit organizations that provide services to low- and moderate-income persons.

Product Innovation and Flexibility

NCB's flexible lending programs have a neutral impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bloomington, Columbus, Kokomo, and non-metropolitan AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Indiana. In the Elkhart-Goshen, Fort Wayne, Michigan City-LaPorte and South Bend-Mishawaka AAs the bank's performance is stronger than the bank's overall performance in Indiana due to more favorable geographic and/or borrower distribution. In the Anderson AA, the bank's performance is weaker than the bank's overall performance in Indiana due to less favorable geographic distribution of home mortgage loans.

Performance in limited-scope AAs did not impact the Lending Test rating in Indiana. Refer to the Tables 1 through 13 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 the State of Indiana is rated "Low Satisfactory". Based on a full-scope review, performance in the Indianapolis AA is adequate. NCB's responsiveness to the identified needs of the AAs is adequate. Performance in the limited-scope AAs did not negatively impact the Investment Test rating in Indiana.

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 current evaluation period, NCB made 24 investments totaling \$8.7 million in the full-scope AA. We also considered the ongoing impact that investments made prior to the current evaluation period had within the AA. As of December 15, 2008, 12 prior period investments had a total remaining balance of \$10.5 million. The volume and nature of the bank's investments demonstrate adequate responsiveness to community needs relative to the bank's resources and its presence in the area. The bank also made investments in statewide funds prior to the current evaluation period that had the potential to impact one or more AAs. The bank could not evidence that the investments impacted any of its AAs and the investments are not given significant weight in this evaluation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Elkhart-Goshen, Fort Wayne, South Bend-Mishawaka and non-metropolitan AAs is stronger than the overall "Low Satisfactory" performance under the Investment Test in Indiana due to a higher volume of investments. Performance in the Anderson, Bloomington, Columbus, Kokomo and Michigan City-LaPorte AAs is weaker than the bank's overall performance in Indiana due to a significantly lower level of investments.

Performance in the limited-scope AAs is not weighted heavily in the overall conclusion for Indiana. Refer to the Table 14 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Indiana is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Indianapolis AA is adequate. Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Indiana.

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.

NCB's delivery systems were reasonably accessible to individuals and geographies of different income levels in Indianapolis. Access to branches in low- and moderate-income areas was adequate.

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the Indianapolis AA. The bank did not open or close any branches in low- or moderate-income areas over the course of the evaluation period in the Indianapolis AA. NCB had a net increase of one branch in a middle-income area during the evaluation period.

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

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Indianapolis AA was excellent and had a positive impact on the Service Test performance. The CD services in the full scope AA were responsive to local community development needs and the volume of services provided were excellent. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing financial education to low- and moderate-income individuals and technical expertise to non-profit or government organizations. In Indianapolis, 20 employees provided services to 18 community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the non-metropolitan AA is weaker than the bank's overall performance in Indiana due to weaker branch distribution. In the Anderson, Columbus, Elkhart-Goshen, Fort Wayne, Kokomo,

Michigan City-LaPorte, and the South Bend-Mishawaka AAs the bank's performance is stronger than the bank's overall performance due to stronger branch distribution.

Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Indiana. Refer to Table 15 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

State of Kentucky Rating

CRA Rating for Kentucky¹¹: **Satisfactory**

The lending test is rated: **High Satisfactory**

The investment test is rated: **High Satisfactory**

The service test is rated: **Outstanding**

The major factors that support this rating include:

- Adequate geographic distribution of HMDA loans and good borrower distribution of HMDA loans; good geographic distribution and borrower distribution of small loans to businesses; and lending levels that reflect good responsiveness to community credit needs;
- Good level of community development investments; and
- Excellent retail banking services readily accessible to geographies and individuals of different income levels.

Description of Institution’s Operations in Kentucky

As of June 30, 2008, NCB is the largest deposit taking institution in the State of Kentucky. NCB has deposits of \$5.8 billion that represent an 8.95 percent market share in Kentucky’s deposits. Of the bank’s 13 rating areas, Kentucky ranks eleventh and accounts for 1.65 percent of NCB’s total deposits. NCB has 45 branch locations in its four defined AAs in Kentucky. Primary competitors include Fifth Third Bank and J.P. Morgan Chase, N.A. with deposit market shares of 7.28 percent and 6.32 percent, respectively. Refer to the market profile for the State of Kentucky in Appendix C for detailed demographics and other performance context information for AAs that received a full-scope review.

Scope of Evaluation in Kentucky

The Lexington-Fayette MSA (Lexington AA) was selected to receive a full-scope review. It is the second largest of the bank’s four designated AAs in Kentucky based on deposit and loan volume. Within the State of Kentucky, NCB has 42 percent of its deposits and 46 percent of its loans in the Lexington AA. The largest AA is Louisville-Jefferson County which is being evaluated as a multistate. The ratings are primarily based on performance in the Lexington AA. See the “Ratings” section in the Scope of Evaluation section and the table in Appendix A for more information.

¹¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Kentucky is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Lexington AA is good. Performance in the limited-scope AAs did not negatively impact the Lending Test rating in Kentucky.

Lexington AA

Lending Activity

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

NCB's lending demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Lexington AA. FDIC deposit market share data ranks NCB second in deposits with a 17 percent market share. Market data for lending ranks NCB sixth in home purchase (3.60 percent market share), eighth in home improvement (4.56 percent market share), and sixth in refinance (3.07 percent market share) within the AA. NCB's small business lending market share rank is thirteenth (1.77 percent market share). The lower lending market share reflects a high number of competitors in the AA.

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is adequate. This conclusion is based on adequate home mortgage performance and good small loans to business performance.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the State of Kentucky 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.

NCB's home purchase loan geographic distribution is adequate. The bank's portion of home purchase loans made in low-income geographies is near to the percentage of owner occupied housing units in low-income geographies. The bank's portion of home purchase loans made in moderate-income geographies is less than the percentage of owner occupied housing units in moderate-income geographies. NCB's home purchase market share of loans in low-income geographies is less than its overall home purchase market share. NCB's home purchase market share in moderate-income geographies is near to its overall home purchase market share.

NCB's home improvement loan geographic distribution is adequate. The bank's portion of home improvement loans made in low-income geographies is significantly less than the

percentage of owner occupied housing units in low-income geographies. The bank's portion of home improvement loans made in moderate-income geographies exceeds the percentage of owner occupied housing units in moderate-income geographies. NCB's home improvement market share in low-income geographies is significantly less than its overall home improvement market share. NCB's home improvement market share in moderate-income geographies exceeds its overall home improvement market share.

NCB's refinance loan geographic distribution is good. The bank's portion of refinance loans made in low-income geographies substantially meets the percentage of owner occupied housing units in low-income geographies. The bank's portion of refinance loans made in moderate-income geographies is less than the percentage of owner occupied housing units in moderate-income geographies. NCB's refinance market share in low-income geographies exceeds its overall refinance market share. NCB's refinance market share in moderate-income geographies is near to its overall refinance market share.

Small Loans to Businesses

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

NCB's geographic distribution of small loans to businesses is good. The bank's portion of small loans to businesses made in low-income geographies exceeds the percentage of businesses in low-income geographies. The bank's portion of small loans to businesses made in moderate-income geographies is less than the percentage of businesses in moderate-income geographies. NCB's small loans to businesses market share in low-income geographies exceeds its overall small loans to businesses market share. NCB's small loans to businesses market share in moderate-income geographies substantially meets its overall small loans to businesses market share.

Small Loans to Farms

Refer to Table 7 in the State of Kentucky section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Small loans to farms were not evaluated; see the "Ratings" section of the Scope of Evaluation section for detail.

Lending Gap Analysis

We evaluated the lending distribution in the 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, competition, market conditions, and demographic information. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The bank made an adequate percentage of its loans within its AAs compared to outside its AAs. The bank made 72 percent of its home mortgage lending and 82 percent of its small loans to businesses within the Kentucky AAs.

Distribution of Loans by Income Level of the Borrower***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in the State of Kentucky 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.

NCB's home purchase loan borrower distribution is good. The bank's portion of home purchase loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is adequate after taking into consideration the percentage of households living below the poverty level. The bank's portion of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families. NCB's home purchase market share to low-income families is less than its overall home purchase market share. NCB's home purchase market share to moderate-income families substantially meets its overall home purchase market share.

NCB's home improvement loan borrower distribution is good. The bank's portion of home improvement loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of home improvement loans made to moderate-income borrowers substantially meets the percentage of moderate-income families. NCB's home improvement market share for low-income families exceeds its overall home improvement market share. NCB's home improvement market share for moderate-income families is near to its overall home improvement market share.

NCB's refinance loan borrower distribution is good. The bank's portion of refinance loans made to low-income borrowers is significantly less than the percentage of low-income families; however, performance is good after taking into consideration the percentage of households living below the poverty level. The bank's portion of refinance loans made to moderate-income families is near to the percentage of moderate-income families. NCB's refinance market share for low-income families is near to its overall refinance market share. NCB's refinance market share for moderate-income families is less than its overall refinance market share.

Small Loans to Businesses

Refer to Table 11 in the State of Kentucky 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.

NCB's borrower distribution of small loans to businesses is good. The bank's portion of small loans to businesses with revenues less than \$1 million is near to the percentage of small businesses. NCB's small loans to businesses market share exceeds its overall market share for the MSA. The bank made a majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Kentucky 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.

NCB's level of CD lending had a positive impact on the evaluation of its lending performance in the AA based on the number and amount of loans, the complexity of loans, and the bank's capacity within the AA. The bank made four CD loans totaling \$6.2 million that directly benefited the AA. There were two loans made to nonprofit organizations for affordable housing and two loans made to nonprofit organizations that provide services to low- and moderate-income persons.

Product Innovation and Flexibility

NCB's flexible lending programs have a positive impact on lending performance. NCB participates in various affordable housing programs for the purchase and rehabilitation of homes throughout its footprint. Programs include reduction in down payment, interest rate, closing costs, and private mortgage insurance. NCB has its own affordable housing program (NCHAMP) and widely utilizes federal, state, and local government housing programs that provide additional resources to borrowers to make homes more affordable. NCB also participates with grant and bond programs specifically targeted to low- and moderate-income borrowers purchasing homes. NCB is an active lender to women-owned businesses and other small businesses and utilizes government small business programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Owensboro AA is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Kentucky. In the Bowling Green and non-metropolitan AAs the bank's performance is stronger than the bank's overall performance in Kentucky due to more favorable geographic and/or borrower distribution of home mortgage loans.

Performance in limited-scope AAs did not negatively impact the Lending Test rating for Kentucky. Refer to the Tables 1 through 13 in the State of Kentucky 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 performance in the State of Kentucky is rated "High Satisfactory". Based on a full-scope review, performance in the Lexington AA is adequate. National City's responsiveness to the identified needs of the Lexington AA is adequate. Performance in the Owensboro and non-metropolitan limited-scope AAs is given significant weight in the evaluation of the bank's overall performance in the State of Kentucky because the bank's presence in these AAs is comparable to its presence in the full-scope AA.

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

During the current evaluation period, NCB made 15 investments totaling \$820 thousand in the full-scope AA. We also considered the ongoing impact that investments made prior to the current evaluation period had within the AA. As of December 15, 2008, four prior period investments had a total remaining balance of \$1.2 million. The volume and nature of the bank's investments demonstrate adequate responsiveness to community needs relative to the bank's resources and its presence in the AA. The bank also made investments in statewide funds prior to the current evaluation period that had the potential to impact one or more AAs. The bank could not evidence that the investments impacted any of its AAs and the investments are not given significant weight in this evaluation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Owensboro and non-metropolitan AAs is stronger than the bank's overall "Low Satisfactory" performance under the Investment Test in Kentucky due to a higher volume of investments. Performance in the Bowling Green AA is weaker than the bank's overall performance in Kentucky due to a lower level of investments.

As described above, performance in the Owensboro and non-metropolitan AAs is weighted heavily in the overall conclusion for Kentucky. Refer to the Table 14 in the State of Kentucky section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Kentucky is rated "Outstanding". Based on a full-scope review, the bank's performance in the Lexington AA is excellent. Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Kentucky.

Retail Banking Services

Refer to Table 15 in the State of Kentucky 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.

NCB's delivery systems were readily accessible to individuals and geographies of different income levels in Lexington. Access to branches in low-income areas was excellent and was good in moderate-income areas.

NCB's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the Lexington AA. The bank did not open or close any branches in low- or moderate-income areas over the course of the evaluation period in the Lexington AA.

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

NCB offers a variety of alternative delivery systems, which include full service ATMs and telephone banking, including loan-by-phone services. On-line banking services include deposit applications, retail loan applications, home equity and mortgage loan applications, small business 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.

NCB offers a product specifically targeted to low- and moderate-income individuals. This individual development deposit account (IDA) is available to participants of an IDA program or through the America Saves campaign. The account has a low minimum opening amount and no monthly service fees. Excessive account activity and early closure fees do not apply for these accounts.

Community Development Services

NCB's performance in providing CD services in the Lexington AA was good and had a positive impact on the Service Test performance. The CD services in the full scope AA was responsive to local community development needs and the volume of services provided was good. Bank management was involved in community development programs that were targeted to low- and moderate-income individuals and geographies. These services involved providing technical expertise to non-profit or government organizations. In Lexington, three employees provided services to five community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bowling Green and the Owensboro AAs is not inconsistent with the bank's overall "Outstanding" performance under the Service Test in Kentucky. In the non-metropolitan AA the bank's performance is weaker than the bank's overall performance in Kentucky due to weaker branch distribution.

Performance in the limited-scope AAs did not negatively impact the overall Service Test rating for Kentucky. Refer to Table 15 in the State of Kentucky 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 nonmetropolitan 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	<p>Florida Lending Test: January 1, 2007 to September 30, 2008 Investment Test: January 1, 2007 to December 15, 2008 Service Test: January 1, 2007 to December 15, 2008 Illinois, Indiana, Kentucky, Michigan, Pennsylvania Lending Test: August 1, 2006 to September 30, 2008 Investment Test: August 1, 2006 to December 15, 2008 Service Test: August 1, 2006 to December 15, 2008 Ohio Lending Test: January 1-2005 to September 30, 2008 Investment Test: July 1, 2005 to December 15, 2008 Service Test: July 1, 2005 to December 15, 2008 Multistates Lending Test: August 1, 2006 to September 30, 2008 Investment Test: August 1, 2006 to December 15, 2008 Service Test: August 1, 2006 to December 15, 2008</p>	
Financial Institution	Products Reviewed	
National City Bank (NCB) Cleveland, Ohio	HMDA, small loans to businesses, community development loans, community development investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
National City Mortgage Corporation	Bank subsidiary	Home purchase, home-improvement and refinance loans
National City Mortgage Service	Bank subsidiary	Home purchase, home-improvement and refinance loans
First Franklin Financial Corporation	Bank subsidiary	Home purchase, home-improvement and refinance loans

National City Community Development Corporation	Holding corporation subsidiary	Community development loans, community development investments, community development services
Red Capital	Bank subsidiary	Community development investments

List of Assessment Areas and Type of Examination

Assessment Area	Type of Exam	Other Information
MULTISTATES		
Chicago-Naperville-Joliet (IL-IN-WI) MSA	Full-scope	
Gary MD, IN	Limited-scope	
Lake County- Kenosha IL, MD	Limited-scope	
Cincinnati-Middleton (OH-KY-IN) MSA	Full-scope	
Huntington-Ashland (WV-KY-OH) MSA	Full-scope	
Louisville-Jefferson County, KY-IN MSA	Full-scope	
St. Louis, MO-IL MSA	Full-scope	
Youngstown-Warren-Boardman (OH-PA) MSA	Full-scope	
STATES		
Florida		
West Palm Beach-Boca Raton-Boynton Beach MD	Full-scope	
Bradenton-Sarasota-Venice MSA	Limited-scope	
Deltona-Daytona Beach-Ormond Beach MSA	Limited-scope	
Fort Lauderdale-Pompano Beach-Deerfield Beach MSA	Limited-scope	
Naples-Marco Island MSA	Limited-scope	
Orlando-Kissimmee MSA	Limited-scope	
Palm Bay-Melbourne-Titusville MSA	Limited-scope	
Palm Coast MSA	Limited-scope	
Port St. Lucie MSA	Limited-scope	
Sebastian-Vero Beach MSA	Limited-scope	
Florida Non-Metropolitan Areas	Limited-scope	
Illinois		
Peoria MSA	Full-scope	
Bloomington-Normal MSA	Limited-scope	
Champaign-Urbana MSA	Limited-scope	
Decatur MSA	Limited-scope	
Kankakee-Bradley MSA	Limited-scope	
Rockford MSA	Limited-scope	
Springfield MSA	Limited-scope	
Illinois Non-Metropolitan Areas	Limited-scope	

Pennsylvania Non-Metropolitan Areas	Limited-scope Limited-scope	
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Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		NATIONAL CITY BANK		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
National City Bank	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Chicago-Naperville-Joliet(IL-IN-WI)	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Cincinnati-Middletown (KY-OH)	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Huntington-Ashland (WV-KY-OH)	High Satisfactory	Outstanding	Outstanding	Outstanding
Louisville-Jefferson County (KY-IN)	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
St. Louis (MO-IL)	Outstanding	Outstanding	Low Satisfactory	Outstanding
Youngstown-Warren-Boardman (OH-PA)	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
State:				
Florida	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Illinois	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Indiana	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Kentucky	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Michigan	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Ohio	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Pennsylvania	High Satisfactory	Needs to Improve	Outstanding	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-Elyria-Mentor MSA (17460)

Demographic Information for Full Scope Area: Cleveland-Elyria-Mentor MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	693	16.02	20.06	38.82	23.81	1.30
Population by Geography	2,148,143	9.74	16.77	43.79	29.67	0.03
Owner-Occupied Housing by Geography	580,878	4.83	12.41	48.22	34.54	0.00
Business by Geography	143,135	8.44	14.97	40.43	35.46	0.70
Farms by Geography	3,328	2.76	6.91	50.42	39.78	0.12
Family Distribution by Income Level	562,913	20.34	18.08	22.21	39.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	216,274	17.82	24.67	41.67	15.84	0.00
Median Family Income		52,660	Median Housing Value		121,274	
HUD Adjusted Median Family Income for 2008		62,100	Unemployment Rate (2000		2.62%	
Households Below Poverty Level		11%	US Census)			

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2008 HUD updated MFI.

The Cleveland-Elyria-Mentor AA comprises all counties in the Cleveland-Elyria-Mentor MSA. The AA includes Cuyahoga, Geauga, Lake, Lorain, and Medina Counties. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB had deposits of \$20.1 billion (market share 31.55 percent) and was the largest deposit taking financial institution of the 41 financial institutions in the AA. NCB has 79 banking offices in this AA. Primary competitors include Key Bank, N.A. and Third Federal Savings and Loan of Cleveland with deposit market shares of 17.05 percent and 8.24 percent, respectively.

The largest city in the MSA is Cleveland. Cleveland's population has been declining since the late 1900's. Cleveland was a major American manufacturing center due to its location on the Cuyahoga River and Lake Erie, coupled with rail links. In more recent years the city has sought to diversify its economy with the service industry led by transportation, trade and utilities and followed closely by education and health services. Many large corporate companies are in Cleveland, including Eaton Corporation, Forest City Enterprises, Sherwin-Williams Company, and Jones Day. However, in recent years, the Cleveland area has lost nearly a dozen corporate headquarters, including TRW, OfficeMax, BP, and Oglebay Norton, mostly through acquisitions or mergers. Major employers include Cleveland Clinic, University Hospitals, and Progressive Insurance.

The unemployment rate has risen in the AA from 5.5 percent in September 2005 to 6.6 percent as of September 2008. As of September 2008, the State of Ohio's and the national unemployment rates were 6.6 percent and 6.1 percent, respectively.

Through contacts with community groups, the following needs were identified:

- Foreclosure counseling
- Financial counseling at schools and businesses
- Offer and support individual development accounts (IDAs)
- Participation in community development projects
- Participation in a Money Management program.
- Lender participation in affordable housing financing products, such as first time home buyer programs, rehabilitation, and refinancing programs.
- Capital funds for affordable housing development
- Financing for buyers of affordable housing
- Funding micro-lending small business program

Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

State of Pennsylvania Full-Scope Area

Pittsburgh MSA (38300)

Demographic Information for Full Scope Area: Pittsburgh MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	721	5.13	23.99	49.79	20.94	0.14
Population by Geography	2,431,087	2.88	20.42	51.63	25.06	0.00
Owner-Occupied Housing by Geography	711,338	1.23	17.74	54.91	26.11	0.00
Business by Geography	153,241	3.78	18.56	45.81	31.73	0.12
Farms by Geography	3,285	0.76	12.54	64.08	22.59	0.03
Family Distribution by Income Level	654,982	19.53	18.74	22.04	39.70	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	250,635	4.83	28.87	53.06	13.24	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		47,195 60,000 11%	Median Housing Value Unemployment Rate (2000 US Census)		86,535 2.81%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2008 HUD updated MFI.

The Pittsburgh AA consists of the entire Pittsburgh MSA which includes Allegheny, Armstrong, Beaver, Butler, Fayette, Washington, and Westmoreland counties. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, the bank had \$10.9 billion in deposits (market share 15.49 percent) and ranked as the second largest deposit taking institution of the 59 financial institutions in the AA. NCB has 138 banking offices in this AA. Primary competitors include PNC, N.A. who is lead deposit taker and Mellon Bank, N.A with deposit market shares of 37.12 percent and 11.29 percent, respectively.

The City of Pittsburgh is the largest city in the AA. While the city is historically known for its steel industry, today its economy is largely based on healthcare, education, technology, robotics, fashion, and financial services, and it has continued to be economically strong. Pittsburgh added jobs in 2008 even as the national economy is in a significant jobs recession. Pittsburgh has the eighth largest number of Fortune 500 companies. Many of the United States' largest companies have a Pittsburgh corporate presence, including Alcoa, Bayer, Calgon Carbon, Del Monte Foods, FedEx Ground, Freemarkets, GlaxoSmithKline, H.J. Heinz Company, PNC Financial Services Group, PPG Industries, Sony Electronics, US Steel Corporation and Westinghouse Electrical Company. Most of the largest employers in Pittsburgh are regional companies. Top employers include the University of Pittsburgh Medical Center, Giant Eagle, West Penn Allegheny Health System, and University of Pittsburgh.

The unemployment rate has risen in the AA from 4.7 percent in September 2005 to 4.8 percent as of September 2008. As of September 2008, the State of Pennsylvania and the national unemployment rates were 5.2 percent and 6.1 percent, respectively.

Through contact with a community group, the following needs were identified:

- Mortgage products for low- and moderate-income borrowers
- Below market financing to fund costs for community development organizations
- More programs and involvement in home equity and home improvement lending

Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

State of Michigan Full-Scope Area

Warren-Troy-Farmington Hills MD (47644)

Demographic Information for Full Scope Area: Warren-Troy-Farmington Hills MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	620	1.94	19.35	51.29	26.94	0.48
Population by Geography	2,227,160	1.66	19.35	52.07	26.91	0.02
Owner-Occupied Housing by Geography	671,041	0.75	17.72	53.08	28.44	0.00
Business by Geography	192,854	2.05	17.96	50.83	29.00	0.17
Farms by Geography	4,666	1.22	16.52	59.84	22.42	0.00
Family Distribution by Income Level	596,510	17.83	18.34	23.84	39.99	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	215,759	3.02	29.52	53.39	14.07	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		67,923 78,800 5%	Median Housing Value Unemployment Rate (2000 US Census)		167,401 2.04%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2008 HUD updated MFI.

The Warren-Troy-Farmington Hills AA consists of four of the five counties in the MD: Lapeer, Livingston, Macomb, and Oakland. St. Clair County is not included as part of the AA. The MD is part of the Detroit-Livonia-Dearborn MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB had \$4 billion in deposits (market share 7.27 percent) and ranked as the fifth largest deposit taking institution of the 52 financial institutions in the AA. NCB has 68 banking offices in this AA. Primary competitors are LaSalle Bank Midwest, N.A. who is lead deposit taker and Comerica Bank with deposit market shares of 33.18 percent and 13.73 percent, respectively.

Warren is the largest city located in Macomb County, Michigan. Farmington Hills is the largest city in Oakland County. Troy is also located in Oakland County. These cities are suburbs of Detroit Michigan. The Warren-Troy-Farmington Hills MD employs 61 percent of the Detroit area's workforce. The MD has shared in the recent economic hardships brought on by troubles at General Motors, Ford, and Chrysler, although it has fared better than Detroit, as its economy is more diverse and less reliant on manufacturing jobs. Major businesses serving Warren consist of the GM Technical Center, US Army Detroit Arsenal, the National Automotive Center, and Big Boy Restaurants, International. Troy is home to a number of major companies, including Delphi Corporation, DuPont Automotive, and Starz Home Entertainment. In 2008 CNN Money ranked Troy as the fourth most affordable U.S. city.

The unemployment rate has risen in the AA from 5.3 percent in September 2005 to 7.3 percent in September 2008. As of September 2008, the Detroit-Livonia-Dearborn MSA rate of 8.3 percent is higher than the AA and the national rate of 6.1 percent.

Most of the housing stock is upscale and at high costs. The housing that is affordable for low- and moderate-income borrowers is that which is from foreclosure or vacant properties with reduced prices.

Through contacts with community groups, the following needs were identified:

- Down payment assistance program
- Rental rehabilitation assistance
- Subsidized housing programs
- More affordable housing stock
- Homeowner and foreclosure counseling

The competition for involvement in larger community development projects is high as a large number of financial institutions and multi-bank holding companies operate in the nearby Detroit metropolitan area. There are not many local community development organizations within the AA. The State of Michigan designated a portion of Macomb County as a Renaissance Zone, providing tax incentives to spur investment and job creation. Also, Michigan designated portions of Oakland County as SmartZones for technology-based business development.

Chicago-Naperville-Joliet MMSA Full-Scope Area

Chicago-Naperville-Joliet MD (16974)

Demographic Information for Full Scope Area: Chicago-Naperville-Joliet MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,715	13.70	24.90	35.39	25.01	0.99
Population by Geography	7,590,877	8.04	23.42	39.24	29.29	0.01
Owner-Occupied Housing by Geography	1,741,664	2.60	15.06	44.96	37.37	0.00
Business by Geography	512,568	4.00	14.63	37.64	43.43	0.30
Farms by Geography	7,618	1.37	8.18	49.49	40.97	0.00
Family Distribution by Income Level	1,853,556	20.88	17.59	22.07	39.46	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	713,105	14.49	33.47	37.95	14.09	0.00
Median Family Income		60,166	Median Housing Value		174,768	
HUD Adjusted Median Family Income for 2008		71,100	Unemployment Rate (2000 US Census)		3.21%	
Households Below Poverty Level		10%				

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

Source: 2000 US Census and 2008 HUD updated MFI

The Chicago-Naperville-Joliet AA comprises seven of the eight counties in the Chicago-Naperville-Joliet MD. The counties are Cook, Dekalb, DuPage, Kane, Kendall, McHenry, and Will counties. Grundy County is not included. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies. Chicago-Naperville-Joliet MD is part of the Chicago-Naperville-Joliet multistate MSA.

As of June 30, 2008, NCB had \$8.1 billion in deposits (market share 3.39 percent) and ranked as the fifth largest deposit taking financial institution of the 254 financial institutions in the AA. NCB has 111 banking offices in this AA. Primary competitors are JP Morgan Chase who is lead deposit taker, LaSalle Bank, N.A. and Harris Bank, N.A. with deposit market shares of 15.26 percent, 11.98 percent, and 10.00 percent, respectively.

The City of Chicago dominates the AA. The AA shares the same challenges as other urban areas, including high housing costs with more than 225,000 households paying more than 30 percent of their income on rent. Housing stock is old with much of the housing being more than sixty years of age. Only approximately 107,000 owner-occupied housing units are affordable to Chicago households earning less than \$30,900 a year.

The AA continues to be a business and distribution center for the Midwest and a popular convention venue. Business, financial and professional services, transportation and distribution services, and tourism are the main drivers of the economy. This is evidenced in the top five employment sectors in the area: professional and business services, education and health services, government, manufacturing, and retail trade. While the AA economy continues to improve, high exposure to the manufacturing and distribution industries, an aging infrastructure, and competition with other cities for tourism and convention dollars may restrain growth.

The unemployment rate has risen in the AA from 6.0 percent in September 2005, to 6.4 percent as of September 2008. This is in line with the September 2008 Chicago-Naperville-Joliet, IL-IN-WI MSA and national unemployment rates of 6.3 percent and 6.1 percent, respectively.

Through contacts with community groups, the following needs were identified:

- Conventional home purchase mortgages in low- and moderate-income areas
- Homebuyer counseling
- Social services to assist the homeless
- Bank branches in low- and moderate-income neighborhoods
- Grant funding for agencies that provide housing counseling
- Credit cards with affordable terms
- Equity equivalent and similar low-cost investments, and funding in Community Development Financial Institutions

There are a large number of community-based organizations in the AA. The primary purposes of these organizations vary greatly and include affordable housing, financial literacy, and creation and retention of small businesses.

Cincinnati-Middletown Multistate MSA (17140)

Demographic Information for Full Scope Area: Cincinnati-Middletown Multi-state MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	451	11.09	21.95	45.01	21.06	0.89
Population by Geography	1,840,541	6.80	18.14	47.69	27.27	0.10
Owner-Occupied Housing by Geography	475,571	2.38	14.70	51.43	31.48	0.00
Business by Geography	114,641	5.68	17.55	47.92	28.01	0.85
Farms by Geography	2,733	1.61	11.31	58.58	28.47	0.04
Family Distribution by Income Level	481,087	18.81	18.19	22.97	40.03	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	177,994	11.53	26.72	47.58	14.18	0.00
Median Family Income		54,771	Median Housing Value		118,407	
HUD Adjusted Median Family Income for 2008		66,200	Unemployment Rate (2000 US Census)		2.17%	
Households Below Poverty Level		10%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2008 HUD updated MFI.

The Cincinnati-Middletown AA comprises four of the five counties in Ohio and three of the seven counties in Kentucky in the Cincinnati-Middletown MSA. In Ohio the AA includes Butler, Clermont, Hamilton, and Warren counties; Brown County is not included. In Kentucky the AA includes Boone, Campbell, and Kenton; Bracken, Gallatin, Grant, and Pendleton counties are not included. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB has \$2.9 billion in deposit (market share of 5.19 percent) and ranked as the third largest deposit taker of the eighty four financial institutions in the AA. NCB has 66 banking offices in this AA. Primary competitors include Fifth Third Bank who is lead deposit taker and US Bank, N.A. with deposit market shares of 33.07 percent and 29.30 percent, respectively.

Cincinnati is the largest city in the MSA. Many factories have closed causing a reduction in jobs which has contributed to the high number of foreclosures in the center city and the inner-ring suburban communities. Much of the housing stock is older homes which are expensive to rehabilitate and frequently require subsidies to make them affordable for low- and moderate-income persons. The ongoing housing downturn continues with house prices still falling. Single family permits have fallen steadily and it is anticipated that they won't rebound until house prices firm.

There are 10 Fortune 500 companies and 18 Fortune 1000 companies headquartered in the Cincinnati area, including Proctor and Gamble, Kroger, Chiquita Brands International, and Sunny Delight Beverages Co. Major employers include the University of Cincinnati, Kroger, Health Alliance of Greater Cincinnati, and the Cincinnati Children's Hospital Medical Center. Service jobs at one time were supporting the local economy, now account for the majority of job losses. Declining manufacturing and construction jobs are compounding the situation. The unemployment rate has risen in the AA from 5.2 percent in September 2005 to 6.1 percent in

September 2008. As of September 2008, the State of Ohio's and the national unemployment rates were 6.6 percent and 6.1 percent, respectively.

Through contacts with community groups, the following needs were identified:

- Low interest housing loans
- Small business loans
- Funding for housing counseling programs
- Reverse mortgage counselors
- Financial literacy education

The AA has a low number of community development opportunities for lending, investment, and service based upon discussions with community organizations and information in the public database.

Huntington-Ashland Multistate MSA (26580)

Demographic Information for Full Scope Area: Huntington-Ashland Multi-state MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	34	0.00	11.76	70.59	17.65	0.00
Population by Geography	148,962	0.00	6.97	71.96	21.07	0.00
Owner-Occupied Housing by Geography	44,986	0.00	5.19	73.04	21.77	0.00
Business by Geography	8,663	0.00	9.74	66.29	23.96	0.00
Farms by Geography	220	0.00	5.91	75.00	19.09	0.00
Family Distribution by Income Level	43,338	21.18	16.89	21.26	40.68	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	16,497	0.00	8.77	76.21	15.02	0.00
Median Family Income		37,119	Median Housing Value		63,861	
HUD Adjusted Median Family Income for 2008		47,000	Unemployment Rate (2000 US Census)		3.46%	
Households Below Poverty Level		17%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2008 HUD updated MFI.

The Huntington-Ashland AA comprises the entire Huntington-Ashland MSA in Kentucky and Ohio. In Kentucky the MSA includes Boyd and Greenup counties. In Ohio the MSA includes Lawrence County. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB has \$386 million in deposits (market share 9.91 percent) and is the largest deposit taker of the 25 financial institutions in the AA. NCB has 11 banking offices in this AA. Primary competitors include City National Bank of West Virginia, Huntington Federal Savings Bank, and JP Morgan Chase Bank, N.A. with deposit market shares of 8.63 percent, 8.26 percent, and 8.03 percent, respectively.

In the Kentucky part of the AA the main cities are Ashland and Flathead. The main city in the Ohio part of the AA is Ironton. Geographically the AA is located along the banks of the Ohio River within the Appalachian Plateau region.

These areas were built on the railroad, steel, and oil industries. A downturn in the industry occurred as the market for iron changed; the nation was making the transition from a demand for iron to steel. As the iron industries closed, the areas had to attract heavy industry to the region. Companies like Allied Signal and Alpha Portland Cement did build in town, but the local economy is not experiencing significant growth. The continued dependency on labor industries has severely hurt the region as a whole. The main employers include hospital/medical facilities, AK Steel and Marathon Oil Refinery in Boyd County Kentucky.

The unemployment rate has declined slightly in the AA from 5.1 percent in September 2005 to 4.8 percent in September 2008. As of September 2008, the State of Ohio's and the national unemployment rates were 6.6 percent and 6.1 percent, respectively.

We were unable to make contacts with community groups in the AA. There is only a small number of community groups in the AA.

Louisville-Jefferson County Multistate MSA (31140)

Demographic Information for Full Scope Area: Louisville-Jefferson County Multi-state MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	243	5.76	26.34	41.56	26.34	0.00
Population by Geography	1,033,013	4.36	19.62	47.18	28.83	0.00
Owner-Occupied Housing by Geography	284,123	1.88	15.55	50.07	32.50	0.00
Business by Geography	78,964	3.84	21.45	38.79	35.92	0.00
Farms by Geography	2,066	1.21	10.21	55.13	33.45	0.00
Family Distribution by Income Level	278,135	19.91	17.79	22.62	39.68	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	104,857	8.48	28.55	48.63	14.35	0.00
Median Family Income		49,301	Median Housing Value		107,050	
HUD Adjusted Median Family Income for 2008		59,400	Unemployment Rate (2000 US Census)		2.37%	
Households Below Poverty Level		11%				

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

Source: 2000 US Census and 2008 HUD updated MFI.

The Louisville-Jefferson County AA includes three of the four counties in Indiana and four of the nine counties in Kentucky in the Louisville-Jefferson County MSA. In Indiana the AA includes Clark, Floyd, and Washington counties; Harrison County is not included. In Kentucky the AA includes Bullitt, Jefferson, Nelson, and Oldham counties; Henry, Meade, Shelby, Spenser, and Tremble counties are not included. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB had deposits of \$4 billion (market share 18.79 percent) and was the largest deposit taking financial institution of the 51 financial institutions in the AA. NCB has 62 banking offices in this AA. Primary competitors include JP Morgan Chase Bank, N.A. and PNC Bank, N.A. with deposit market shares of 13.05 percent and 10.01 percent respectively.

In 2003 the City of Louisville merged city and county governments to become the consolidated city-county government named Louisville-Jefferson County Metro Government (Louisville Metro for short). Louisville has faced broad-based job losses, most severely in manufacturing. Ford Motor Co, which is one of the top employers in the area, has been aggressively reducing its workforce in response to decreased demand, causing local parts manufacturers to reduce their payrolls as well. Other major employers in the Louisville area include UPS, which has a world port global air hub at Louisville International Airport, Humana, Norton Healthcare, and GE Consumer and Industrial. The unemployment rate has risen in the AA from 5.5 percent in September 2005 to 6.8 percent in September 2008. As of September 2008, the State of Kentucky and the national unemployment rates were 6.5 percent and 6.1 percent, respectively.

Unemployment and underemployment continue to be significant problems. Segments of the MSA still contain large populations of families living below the poverty level. This has created significant challenges for financial institutions attempting to originate home purchase loans.

Through contacts with community groups, the following needs were identified:

- Lines of credit for acquisition of homes
- Affordable housing programs by banks

A moderate level of opportunities exist for creating partnerships with nonprofit housing organizations, community service groups, credit counseling agencies, and micro-loan funds. Our contacts indicated that a number of community groups operate in the area, but that their capacity is limited.

St Louis Multistate MSA (41180)

Demographic Information for Full Scope Area: St Louis Multi-state MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	511	10.76	23.48	42.66	22.31	0.78
Population by Geography	2,507,460	5.90	19.69	48.10	26.31	0.01
Owner-Occupied Housing by Geography	694,902	3.13	16.63	51.17	29.06	0.00
Business by Geography	176,916	4.89	17.99	45.66	31.14	0.32
Farms by Geography	4,563	1.18	8.90	66.25	23.58	0.09
Family Distribution by Income Level	661,153	19.22	18.13	22.44	40.21	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	246,941	10.74	29.60	47.47	12.19	0.00
Median Family Income		53,435	Median Housing Value		107,067	
HUD Adjusted Median Family Income for 2008		65,000	Unemployment Rate (2000 US Census)		2.83%	
Households Below Poverty Level		10%				

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

Source: 2000 US Census and 2008 HUD updated MFI.

The St. Louis AA comprises three of the eight counties in Illinois and six of the eight counties in the St. Louis MSA. In Illinois the AA includes Madison, Monroe, and St. Clair counties; Bond, Calhoun, Clinton, Jersey, and Macoupin counties are not included. In Missouri the AA includes Franklin, Jefferson, St. Charles, St. Louis, St. Louis City, and Warren counties; Lincoln and Washington counties are not included. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB had deposits of \$2.3 billion in deposits (market share 4.02 percent) and ranked as the sixth largest deposit taking financial institution of the 145 financial institutions. NCB has 56 offices in this AA. Primary competitors include US Bank, N.A. who is lead deposit taker and Bank of America, N.A. with deposit market shares of 17.62 percent and 13.61 percent, respectively.

The largest employers in the St. Louis area include BJC Healthcare, Boeing Integrated Defense Systems, Schnucks Markets, Inc, Scott Air Force Base, and SSM Health Care. Employment in the St. Louis MO-IL MSA experienced a .9 percent decline from October 2007 to October 2008.

The unemployment rate has risen in the AA from 5.2 percent in September 2005 to 6.7 percent in September 2008. As of September 2008, the State of Missouri and national unemployment rates were slightly lower at 6.2 percent and 6.1 percent, respectively.

Community contacts made during the evaluation period indicated significant credit needs include:

- Reverse mortgages
- Financial literacy counseling
- Sponsorship or financial contributions to community organizations
- Representation on community organizations' board or committee

- Participation in home ownership and home improvement programs

Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

Youngstown-Warren-Boardman Multistate MSA (49660)

Demographic Information for Full Scope Area: Youngstown-Warren-Boardman Multi-state MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	168	10.12	22.02	54.17	13.10	0.60
Population by Geography	602,964	4.31	15.14	62.07	18.48	0.00
Owner-Occupied Housing by Geography	176,407	2.55	11.77	64.91	20.77	0.00
Business by Geography	33,427	5.33	14.02	55.63	24.82	0.20
Farms by Geography	1,119	0.89	4.29	76.05	18.77	0.00
Family Distribution by Income Level	163,699	18.74	18.92	22.62	39.71	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	61,658	7.07	21.56	60.61	10.75	0.00
Median Family Income		44,378	Median Housing Value		79,856	
HUD Adjusted Median Family Income for 2008		52,000	Unemployment Rate (2000 US Census)		2.81%	
Households Below Poverty Level		11%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2008 HUD updated MFI.

The Youngstown-Warren-Boardman AA includes all counties in Ohio and Pennsylvania in the Youngstown-Warren-Boardman MSA. In Ohio the AA includes Mahoning and Trumbull counties. In Pennsylvania the AA includes Mercer County. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB had \$1.3 billion in deposits (market share 15.02 percent) and ranked as the second largest deposit taking financial institutions of the 19 financial institutions in the AA. NCB has 25 banking offices in this AA. Primary competitors include Huntington National Bank who is lead deposit taker and First Place Bank with deposit market shares of 20.87 percent and 14.51 percent, respectively.

Traditionally known as a center of steel production, the area was forced to redefine itself when the U.S. steel industry fell into decline in the 1970's. A General Motors assembly plant has been a mainstay and the largest employer in the area. Other local employers include Delphi, Packard Electric Systems, and the WCI Steel plant.

Youngstown, Ohio, in Mahoning County, is the largest city in the MSA; and the eighth largest city in Ohio. One of the largest employers in Youngstown is Youngstown State University.

The unemployment rate has risen in the AA from 6.0 percent in September 2005 to 7.2 percent in September 2008. As of September 2008, the State of Ohio and national unemployment rates were lower at 6.6 percent and 6.1 percent, respectively.

Through contacts with community groups, the following need was identified:

- Involvement of large banks with community groups

Competition for CD loans, qualified investments, and CD services is moderate and consists primarily of local financial institutions that have a presence within the AA.

State of Florida Full-Scope Area

West Palm Beach-Boca Raton-Boynton Beach MD (48424)

Demographic Information for Full Scope Area: West Palm Beach-Boca Raton-Boynton Beach MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	265	5.66	26.42	33.58	33.58	0.75
Population by Geography	1,131,184	4.21	29.32	33.88	32.37	0.21
Owner-Occupied Housing by Geography	354,024	1.53	24.63	36.35	37.50	0.00
Business by Geography	185,936	3.42	21.29	34.64	40.49	0.16
Farms by Geography	3,947	4.10	23.00	35.39	37.47	0.03
Family Distribution by Income Level	306,002	19.86	18.56	20.60	40.98	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	117,575	7.08	40.85	33.45	18.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		53,777 66,000 9%	Median Housing Value Unemployment Rate (2000 US Census)		131,523 2.24%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2008 HUD updated MFI.

The West Palm Beach-Boca Raton-Boynton Beach AA consists of the only county, Palm Beach, in the West Palm Beach-Boca Raton-Boynton Beach MD. The MD is part of the Miami-Fort Lauderdale-Pompano Beach MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB had \$2.7 billion in deposits (market share 7.41 percent) and ranked as the third largest deposit taking financial institution of the 67 financial institutions in the AA. NCB has 46 banking offices in this AA. Major competitors include Wachovia, N.A. who is lead deposit taker and Bank of America, N.A. with deposit market shares of 27.76 percent and 13.14 percent, respectively.

West Palm Beach is the largest community in the AA. Primary industries include professional and business services, trade, transportation, and utilities, education and health services, and leisure and hospitality. One of the area's most important long-term growth drivers will be the biotech industry. Both Scripps and Max Planck Institutes are expanding in Palm Beach County.

The unemployment rate has risen in the AA from 4.1 percent in September 2005 to 7.3 percent in September 2008. As of September 2008, the State of Florida and national unemployment rates were lower at 6.3 percent and 6.1 percent, respectively.

A recession concentrated in housing-related industries, and the loss of construction weighed heavily on the local economy. Housing prices have declined 40 percent since early 2006, reflecting the effect of foreclosures on housing prices. Forecasters expect housing prices to decline by an additional 23 percent by the end of 2009. The technology industry, however, held fairly steady. The AA is challenged economically due to the nature of the workforce

(primarily retail and service based) and dependence on tourism and part-time residents. Also heavy reliance is placed on the year-round construction industry, which has provided some higher paying trade jobs prior to the rapid decrease in housing and rental starts. Providing affordable and decent housing for workers is a challenge because the predominant area of Palm Beach is extremely wealthy.

Through contacts with community groups, the following needs were identified:

- Funding counseling by non-profit organizations
- Funding operations for non-profit organizations
- Partner with Federal Home Loan Bank Board programs
- Originate and retain mortgages in bank portfolio

Competition for CD loans, qualified investments, and CD services is high and consists primarily of local financial institutions that have a presence within the AA.

State of Illinois Full-Scope Area

Peoria MSA (37900)

Demographic Information for Full Scope Area: Peoria MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	87	11.49	12.64	57.47	18.39	0.00
Population by Geography	347,387	6.22	13.03	59.85	20.89	0.00
Owner-Occupied Housing by Geography	98,188	3.30	10.41	64.42	21.87	0.00
Business by Geography	20,832	9.51	12.14	56.01	22.33	0.00
Farms by Geography	1,461	0.68	2.46	79.33	17.52	0.00
Family Distribution by Income Level	93,132	18.93	18.48	23.85	38.74	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,843	11.41	17.88	58.84	11.86	0.00
Median Family Income		52,122	Median Housing Value		90,478	
HUD Adjusted Median Family Income for 2008		63,400	Unemployment Rate (2000 US Census)		2.41%	
Households Below Poverty Level		9%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2008 HUD updated MFI.

The Peoria AA includes three of the five counties in the Peoria MSA. The counties in the AA include Peoria, Tazewell, and Woodford counties; Marshall and Stark are not included. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB has \$660 million in deposits (market share 11.26 percent) and ranked as the second largest deposit taking financial institution of the 44 financial institutions in the AA. NCB has 12 banking offices in this AA. Major competitors include Morton Community Bank who is lead deposit taker and Heartland Bank & Trust Company with deposit market shares of 20.43 percent and 7.83 percent, respectively.

Peoria is the principal city in the MSA. Peoria is often used as a test market for new products and services, and also used for public policy polling. It has withstood the housing market crisis as its housing stock is very affordable in comparison to other markets around the US. Medicine has become a major part of Peoria's economy. In addition to three major hospitals, the USDA's National Center for Agricultural Utilization Research formerly called the USDA Northern Regional Research Lab, is located in Peoria. This lab was where mass production of penicillin was developed. It is also has global companies, including Caterpillar Inc. and Komatsu America Corp.

The unemployment rate has risen in the AA from 4.3 percent in September 2005 to 5.7 percent in September 2008. In September 2008, the State of Illinois and national unemployment rates were higher at 6.4 percent and 6.1 percent, respectively.

A community contact made during the evaluation period did not identify any unmet credit needs. The AA had a low number of community development lending, investment, and service

opportunities based upon discussion with the community organization and information obtained in public databases.

Competition for CD loans, qualified investments, and CD services is high and consists primarily of local financial institutions that have a presence within the AA.

State of Indiana Full-Scope Area

Indianapolis-Carmel MSA (26900)

Demographic Information for Full Scope Area: Indianapolis-Carmel MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	295	8.81	28.47	43.05	19.32	0.34
Population by Geography	1,403,024	5.03	24.05	45.22	25.69	0.00
Owner-Occupied Housing by Geography	365,980	3.11	19.49	47.47	29.94	0.00
Business by Geography	117,170	4.03	18.13	47.10	30.63	0.11
Farms by Geography	3,213	1.40	11.86	63.06	23.69	0.00
Family Distribution by Income Level	365,410	19.52	18.71	22.99	38.79	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	139,663	8.84	36.60	42.76	11.79	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		55,425 65,100 9%	Median Housing Value Unemployment Rate (2000 US Census)		111,852 2.33%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2008 HUD updated MFI.

The Indianapolis-Carmel AA includes nine of the ten counties in the Indianapolis-Carmel MSA. The AA includes Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Marion, Putnam, and Shelby counties; Morgan County is not included. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB had \$4.5 billion in deposits (market share 17.14 percent) and ranked as the second largest deposit taking financial institution of the 54 financial institutions in the AA. NCB has 71 banking offices in the AA. Major competitors include J.P. Morgan Chase, N.A who is lead deposit taker and Fifth Third Bank with deposit market shares of 27.87 percent and 8.73 percent, respectively.

The largest city in the AA is Indianapolis. The AA has a diversified industrial structure, a strong distribution system, and low cost of doing business and cost of living. Major industries in the AA are administrative and support services, food services, professional, scientific, and technical services, ambulatory health care services, and specialty trade contractors.

The unemployment rate has risen in the AA from 4.5 percent in September 2005 to 5.1 percent in September 2008. As of September 2008, the State of Indiana's unemployment rate was higher at 5.8 percent and the national unemployment rate was higher at 6.1 percent.

Community contacts made during the evaluation period indicated that significant credit needs include:

- Affordable mortgage products
- Financial planning workshops
- Financial literacy classes

- Funding for nonprofit organizations

Competition for CD loans, qualified investments, and CD services is moderate and consists primarily of local financial institutions that have a presence within the AA.

State of Kentucky Full-Scope Area

Lexington-Fayette MSA (30460)

Demographic Information for Full Scope Area: Lexington-Fayette MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	89	10.11	20.22	42.70	25.84	1.12
Population by Geography	388,966	7.54	21.35	41.66	29.34	0.11
Owner-Occupied Housing by Geography	93,044	2.88	18.17	43.70	35.25	0.00
Business by Geography	36,556	10.40	18.57	37.39	33.45	0.19
Farms by Geography	1,642	3.71	11.63	40.74	43.91	0.00
Family Distribution by Income Level	99,651	20.38	17.68	21.65	40.29	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	37,924	9.15	31.32	42.90	16.63	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		51,365 63,500 12%	Median Housing Value Unemployment Rate (2000 US Census)		113,828 2.70%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2008 HUD updated MFI.

The Lexington-Fayette County AA comprises five of the six counties in the Lexington-Fayette County MSA. The AA includes Clark, Fayette, Jessamine, Scott, and Woodford counties; Bourbon County is not included. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2008, NCB had \$670 million in deposits (market share 8.57 percent) and ranked as the fourth largest deposit taking financial institution of the 38 financial institutions in the AA. The bank had 20 banking offices in this AA. Major competitors include JP Morgan Chase, N.A. who is lead deposit taker and Central Bank & Trust Company with deposit market shares of 14.43 percent and 13.76 percent, respectively.

Lexington is the primary city in the AA. The City of Lexington is home to several large corporations, including two Fortune 500 companies, Affiliated Computer Services, and Lexmark International. UPS, Trane, and Amazon.com also are large employers as well as Toyota and the University of Kentucky. Currently Lexington and surrounding areas are experiencing job losses, with both service and manufacturing industries laying off workers at an accelerated pace.

The unemployment rate has risen in the AA from 4.5 percent in September 2005 to 5.3 percent in September 2008. In September 2008, the State of Kentucky's unemployment rate was higher at 6.5 percent as was the national unemployment rate at 6.1 percent.

The housing market is typical of other markets in the economy. The inventory of unsold homes on the market has risen and many residents are no longer in a position to buy a home.

Through contacts with community groups, the following needs were identified:

- Facilitate small business lending by participation in SBA/lending program
- Partner and assist community development organizations' implementation of tax credit investments
- Assist in developing foreclosure prevention strategies or loan modification programs

Competition for CD loans, qualified investments, and CD services is moderate and consists primarily of local financial institutions that have a presence within the AA.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of 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. Deposit data are compiled by the FDIC and are available as of June 30th of each year. 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 included in each set:

- 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. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, 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 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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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.

Tables of Performance Data

Multistate Metropolitan Area(s)

Chicago-Naperville-Joliet
Cincinnati-Middletown
Huntington-Ashland
Louisville-Jefferson County
St. Louis
Youngstown-Warren-Board

State(s)

Florida
Illinois
Indiana
Kentucky
Michigan
Ohio
Pennsylvania

Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE CHICAGO						Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area (2008):	% 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:												
Chicago-Naperville-Joliet	87.21	26,727	5,356,995	3,443	236,281	1	205	8	28,088	30,179	5,621,569	69.13
Limited Review:												
Gary	4.36	1,337	159,189	165	10,235	8	1,089	0	0	1,510	170,513	2.93
Lake County-Kenosha County	8.43	2,369	481,492	545	34,266	0	0	1	9,652	2,915	525,410	27.94

* Loan Data as of September 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2008.

*** Deposit Data as of March 12, 2009. 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		Geography: MULTISTATE CHICAGO					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Chicago-Naperville-Joliet	13,548	87.29	2.60	5.48	15.06	15.34	44.96	38.79	37.38	40.39	3.62	4.06	3.36	3.27	4.01	
Limited Review:																
Gary	851	5.48	2.54	0.82	23.76	15.98	48.62	48.41	25.08	34.78	2.61	0.00	1.64	2.42	3.43	
Lake County-Kenosha County	1,122	7.23	1.19	0.80	16.35	21.75	36.62	48.31	45.84	29.14	4.03	3.45	5.57	4.26	3.05	

* Based on New Folder (001)\filter 2007 west

** 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE CHICAGO						Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008							
MA/Assessment Area:	Total Home Improvement 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	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago-Naperville-Joliet	753	85.37	2.60	4.12	15.06	15.94	44.96	42.36	37.38	37.58	1.49	1.02	1.07	1.30	2.09
Limited Review:															
Gary	60	6.80	2.54	1.67	23.76	8.33	48.62	63.33	25.08	26.67	1.44	0.00	.28	2.00	1.49
Lake County-Kenosha County	69	7.82	1.19	0.00	16.35	17.39	36.62	44.93	45.84	37.68	2.27	0.00	2.27	2.45	2.09

* Based on New Folder (001)\filter 2007 west

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: MULTISTATE CHICAGO				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
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:																				
Chicago-Naperville-Joliet	12,403	88.55	2.60	3.13	15.06	12.97	44.96	42.40	37.38	41.50	2.14	1.76	1.67	2.09	2.46					
Limited Review:																				
Gary	426	3.04	2.54	1.17	23.76	15.73	48.62	49.77	25.08	33.33	1.61	.59	1.17	1.62	1.90					
Lake County-Kenosha County	1,178	8.41	1.19	1.44	16.35	14.43	36.62	49.32	45.84	34.80	2.30	3.36	2.41	2.80	1.79					

* Based on New Folder (001)\filter 2007 west

** 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: MULTISTATE CHICAGO					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
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 Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Chicago-Naperville-Joliet	3,436	82.88	4.00	2.53	14.63	11.55	37.64	41.47	43.43	44.44	0.56	0.63	0.53	0.62	0.52									
Limited Review:																								
Gary	165	3.98	5.68	4.24	20.26	14.55	45.15	46.67	28.91	34.55	0.47	1.23	0.57	0.48	0.40									
Lake County-Kenosha County	545	13.15	1.01	0.18	14.97	13.03	31.75	43.30	52.28	43.49	0.75	0.50	1.05	0.98	0.59									

* Based on 2007 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 (2008).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: MULTISTATE CHICAGO Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	Overa ll	Low	Mod	Mid
Full Review:																
Chicago-Naperville-Joliet	1	11.11	1.37	0.00	8.18	0.00	49.49	0.00	40.97	100.00	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:																
Gary	8	88.89	1.07	0.00	6.32	0.00	72.55	100.00	20.05	0.00	2.60	0.00	0.00	3.64	0.00	
Lake County-Kenosha County	0	0.00	1.37	0.00	18.05	0.00	41.20	0.00	39.38	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: MULTISTATE CHICAGO					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
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****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Chicago-Naperville-Joliet	13,565	87.30	20.88	4.29	17.59	20.55	22.07	30.45	39.46	44.71	3.84	4.39	3.93	3.72	3.84									
Limited Review:																								
Gary	851	5.48	22.31	13.09	18.71	27.25	22.76	26.77	36.22	32.89	2.85	3.15	2.69	2.90	2.86									
Lake County-Kenosha County	1,122	7.22	17.00	11.25	17.25	31.72	22.01	26.29	43.75	30.75	4.15	5.22	5.73	4.18	3.16									

* Based on New Folder (001)\filter 2007 west

** As a percentage of loans with borrower income information available. No information was available for 6.6% 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTISTATE CHICAGO						Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008							
MA/Assessment Area:	Total Home Improvement 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:															
Chicago-Naperville-Joliet	753	85.37	20.88	6.19	17.59	14.40	22.07	27.73	39.46	51.68	1.53	1.23	0.82	1.37	2.01
Limited Review:															
Gary	60	6.80	22.31	21.67	18.71	10.00	22.76	28.33	36.22	40.00	1.47	1.86	.59	1.26	1.99
Lake County-Kenosha County	69	7.82	17.00	9.09	17.25	18.18	22.01	33.33	43.75	39.39	2.21	3.97	1.26	2.63	2.06

* Based on New Folder (001)\filter 2007 west

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MULTISTATE CHICAGO				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Chicago-Naperville-Joliet	12,409	88.55	20.88	3.64	17.59	16.38	22.07	29.50	39.46	50.48	2.21	1.33	1.89	2.05	2.52	
Limited Review:																
Gary	426	3.04	22.31	8.86	18.71	25.57	22.76	26.08	36.22	39.49	1.59	1.44	1.60	1.63	1.58	
Lake County-Kenosha County	1,178	8.41	17.00	6.22	17.25	21.73	22.01	24.51	43.75	47.54	2.35	2.16	2.38	2.26	2.41	

* Based on New Folder (001)\filter 2007 west

** As a percentage of loans with borrower income information available. No information was available for 8.4% 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.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATE CHICAGO			Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
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:									
Chicago-Naperville-Joliet	3,443	82.90	66.96	79.35	89.28	4.88	5.84	0.56	1.35
Limited Review:									
Gary	165	3.97	63.23	72.12	90.30	6.06	3.64	0.47	0.98
Lake County-Kenosha County	545	13.12	68.46	76.15	89.36	4.95	5.69	0.75	1.69

* Based on 2007 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 - 2008).

**** 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 1.81% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATE CHICAGO			Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% 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:									
Chicago-Naperville-Joliet	1	11.11	94.89	100.00	0.00	100.00	0.00	0.00	0.00
Limited Review:									
Gary	8	88.89	96.78	87.50	50.00	37.50	12.50	2.60	3.64
Lake County-Kenosha County	0	0.00	92.71	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MULTISTATE CHICAGO			Evaluation Period: AUGUST 1, 2006 TO DECEMBER 15, 2008						
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:									
Chicago-Naperville-Joliet	7	6,175	30	18,951	37	25,126	96.06	0	0
Limited Review:									
Gary	1	530	0	0	1	530	2.03	0	0
Lake County-Kenosha County	0	0	1	500	1	500	1.91	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: MULTISTATE CHICAGO Evaluation Period: AUGUST 1, 2006 to DECEMBER 15, 2008																	
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:																	
Chicago-Naperville-Joliet	69.13	111	84.73	3.60	13.51	28.83	53.15	9	0	+2		+2	+5	8.04	23.42	39.24	29.29
Limited Review:																	
Gary	2.93	7	5.34	14.29	14.29	28.57	42.85	0	0					5.36	28.70	44.80	21.14
Lake County	27.94	13	9.93	0.00	38.46	15.38	46.16	1	0		+1			2.76	24.34	33.68	39.23

Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE OTHER AREAS						Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area (2008):	% 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:												
Cincinnati-Middletown	100.00	7,153	866,228	2,308	284,976	0	0	15	34,180	9,476	1,185,384	100.00
Huntington-Ashland	100.00	738	56,238	241	18,815	0	0	2	2,000	981	77,053	100.00
Louisville-Jefferson County	100.00	4,476	511,730	2,175	213,381	13	2,055	17	33,140	6,681	760,306	100.00
St Louis	100.00	5,077	769,885	876	125,041	2	216	18	61,142	5,973	956,284	100.00
Youngstown-Warren-Boardman	100.00	1,650	137,973	1,184	106,540	0	0	3	2,246	2,837	246,759	100.00

* Loan Data as of September 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2008.

*** Deposit Data as of March 11, 2009. 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 Geography: MULTISTATE OTHER AREAS Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008																
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	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
Cincinnati-Middletown	3,956	53.86	2.38	2.40	14.70	14.64	51.43	50.66	31.49	32.30	4.09	3.78	4.55	4.22	3.76	
Huntington-Ashland	323	4.40	0.00	0.00	5.19	6.50	73.04	76.16	21.77	17.34	7.73	0.00	5.65	8.77	5.56	
Louisville-Jefferson County	2,232	30.39	1.88	0.94	15.55	15.28	50.07	46.28	32.50	37.50	4.74	2.85	5.15	4.62	4.83	
St Louis	2,388	13.27	3.13	2.72	16.63	19.05	51.17	48.08	29.07	30.15	1.55	0.93	1.76	1.42	1.73	
Youngstown-Warren-Boardman	834	11.35	2.55	1.44	11.77	6.95	64.91	67.27	20.77	24.34	4.70	8.93	3.34	4.96	4.37	

* Based on 2007 Peer Mortgage Data

** 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE OTHER AREAS					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units**	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units**	% BANK Loans						
Full Review:																
Cincinnati-Middletown	481	45.38	2.38	2.91	14.70	13.93	51.43	48.44	31.49	34.72	5.72	5.39	5.56	5.64	5.95	
Huntington-Ashland	95	8.96	0.00	0.00	5.19	5.26	73.04	69.48	21.77	25.26	7.49	0.00	11.11	7.07	8.23	
Louisville-Jefferson County	343	32.36	1.88	2.04	15.55	21.57	50.07	47.23	32.50	29.16	6.39	6.73	6.94	5.81	7.01	
St Louis	220	19.86	3.13	3.64	16.63	17.27	51.17	50.91	29.07	28.18	1.50	2.08	1.38	1.37	1.77	
Youngstown-Warren-Boardman	141	13.30	2.55	3.54	11.77	11.35	64.91	73.76	20.77	11.35	3.78	7.69	3.48	4.46	1.30	

* Based on 2007 Peer Mortgage Data

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: MULTISTATE OTHER AREAS Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008															
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:															
Cincinnati-Middletown	2,716	48.40	2.38	2.10	14.70	13.11	51.43	48.41	31.49	36.38	3.25	3.01	3.10	3.05	3.66
Huntington-Ashland	320	5.70	0.00	0.00	5.19	5.31	73.04	68.75	21.77	25.94	6.02	0.00	9.24	5.23	7.68
Louisville-Jefferson County	1,901	33.87	1.88	0.84	15.55	13.41	50.07	48.40	32.50	37.35	3.98	0.74	3.83	4.09	4.03
St Louis	2,465	14.90	3.13	2.15	16.63	13.63	51.17	49.45	29.07	34.77	1.41	1.09	1.11	1.31	1.76
Youngstown-Warren-Boardman	675	12.03	2.55	0.74	11.77	6.52	64.91	69.63	20.77	23.11	4.22	3.17	2.44	4.41	4.33

* Based on 2007 Peer Mortgage Data

** 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: MULTISTATE OTHER AREAS Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008															
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:															
Cincinnati-Middletown	2,297	39.20	5.68	5.66	17.55	15.54	47.92	41.66	28.01	37.14	1.73	2.38	1.94	1.62	1.78
Huntington-Ashland	241	4.11	0.00	0.00	9.74	11.62	66.29	61.00	23.96	27.39	3.79	0.00	4.91	3.88	3.75
Louisville-Jefferson County	2,175	37.12	3.84	5.01	21.45	22.99	38.79	37.06	35.92	34.94	2.93	5.70	3.99	2.96	2.37
St Louis	868	17.26	4.89	5.88	17.99	11.64	45.66	42.05	31.14	40.44	0.42	0.79	0.31	0.43	0.43
Youngstown-Warren-Boardman	1,146	19.56	5.33	4.89	14.02	16.14	55.63	56.81	24.82	22.16	3.67	5.59	6.01	3.70	2.56

* Based on 2007 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 (2007).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: MULTISTATE OTHER AREAS Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Cincinnati-Middletown	0	0.00	1.61	0.00	11.31	0.00	58.58	0.00	28.47	0.00	0.00	0.00	0.00	0.00	0.00
Huntington-Ashland	0	0.00	0.00	0.00	5.91	0.00	75.00	0.00	19.09	0.00	0.00	0.00	0.00	0.00	0.00
Louisville-Jefferson County	13	100.00	1.21	0.00	10.21	0.00	55.13	84.62	33.45	15.38	4.93	0.00	0.00	6.98	2.17
St Louis	2	18.18	1.18	0.00	8.90	0.00	66.25	100.00	23.58	0.00	0.16	0.00	0.00	0.20	0.00
Youngstown-Warren-Boardman	0	0.00	0.89	0.00	4.29	0.00	76.05	0.00	18.77	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2007).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTISTATE OTHER AREAS					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
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:																
Cincinnati-Middletown	3,956	53.86	18.81	11.51	18.19	27.36	22.97	28.00	40.03	33.13	4.25	4.30	4.43	4.43	4.04	
Huntington-Ashland	323	4.40	21.18	10.00	16.89	27.50	21.26	24.06	40.68	38.44	8.27	8.38	9.33	7.83	8.03	
Louisville-Jefferson County	2,232	30.39	19.91	13.80	17.79	27.64	22.62	26.60	39.68	31.96	4.55	6.07	4.90	4.63	3.95	
St Louis	2,390	13.26	19.22	7.97	18.13	22.50	22.44	27.25	40.21	42.28	1.55	0.70	1.22	1.55	1.98	
Youngstown-Warren-Boardman	834	11.35	18.74	12.44	18.92	31.34	22.62	30.37	39.71	25.85	5.02	5.71	5.60	5.54	4.00	

* Based on 2007 Peer Mortgage Data

** As a percentage of loans with borrower income information available. No information was available for 6.3% 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTISTATE OTHER AREAS					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans***	% Families***	% BANK Loans***						
Full Review:																
Cincinnati-Middletown	481	45.38	18.81	11.06	18.19	21.50	22.97	27.56	40.03	39.88	5.78	5.36	6.04	5.48	5.94	
Huntington-Ashland	95	8.96	21.18	13.68	16.89	23.16	21.26	23.16	40.68	40.00	7.69	13.46	6.76	8.28	6.84	
Louisville-Jefferson County	343	32.36	19.91	19.41	17.79	25.29	22.62	23.24	39.68	32.06	6.42	9.02	6.70	5.44	6.10	
St Louis	220	19.86	19.22	11.27	18.13	20.19	22.44	26.29	40.21	42.25	1.52	1.33	1.29	1.41	1.75	
Youngstown-Warren-Boardman	141	13.30	18.74	14.39	18.92	23.74	22.62	28.06	39.71	33.81	3.74	4.35	3.26	3.65	3.94	

* Based on 2007 Peer Mortgage Data

** As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: MULTISTATE OTHER AREAS Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008															
MA/Assessment Area:	Total Home Mortgage Refinance 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:															
Cincinnati-Middletown	2,716	48.40	18.81	9.47	18.19	20.61	22.97	27.27	40.03	42.65	3.34	3.37	2.94	3.03	3.75
Huntington-Ashland	320	5.70	21.18	10.36	16.89	19.42	21.26	22.65	40.68	47.57	6.34	6.98	4.97	6.32	6.71
Louisville-Jefferson County	1,901	33.87	19.91	10.80	17.79	22.61	22.62	26.85	39.68	39.74	4.04	4.28	4.17	3.96	3.97
St Louis	2,467	14.91	19.22	7.93	18.13	18.82	22.44	27.40	40.21	45.85	1.41	1.04	1.16	1.36	1.64
Youngstown-Warren-Boardman	675	12.03	18.74	10.65	18.92	22.07	22.62	28.77	39.71	38.51	4.45	4.35	4.45	3.83	4.94

* Based on 2007 Peer Mortgage Data

** As a percentage of loans with borrower income information available. No information was available for 6.3% 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.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: MULTISTATE OTHER AREAS Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008									
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:									
Cincinnati-Middletown	2,308	39.07	62.68	62.52	74.26	11.96	13.78	1.73	2.88
Huntington-Ashland	241	4.08	60.15	70.54	85.89	7.88	6.22	3.79	7.34
Louisville-Jefferson County	2,175	36.81	63.08	57.93	80.23	9.20	10.57	2.93	4.62
St Louis	876	17.37	64.83	57.42	63.13	19.41	17.47	0.42	0.64
Youngstown-Warren-Boardman	1,184	20.04	64.36	56.50	79.56	12.25	8.19	3.67	5.83

* Based on 2007 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 - 2007).

**** 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 5.13% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATE OTHER AREAS			Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% 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:									
Cincinnati-Middletown	0	0.00	96.16	0.00	0.00	0.00	0.00	0.00	0.00
Huntington-Ashland	0	0.00	98.64	0.00	0.00	0.00	0.00	0.00	0.00
Louisville-Jefferson County	13	100.00	97.34	61.54	61.54	7.69	30.77	4.93	3.70
St Louis	2	18.18	97.30	100.00	50.00	50.00	0.00	0.16	0.20
Youngstown-Warren-Boardman	0	0.00	97.77	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2007).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 23.08% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MULTISTATE OTHER AREAS				Evaluation Period: AUGUST 1, 2006 TO DECEMBER 15, 2008				
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:										
Cincinnati-Middletown	3	2,073	33	5,552	36	7,625	100.00	0	0	
Huntington-Ashland	0	0	2	3,722	2	3,722	100.00	0	0	
Louisville-Jefferson County	11	13,846	31	12,235	42	26,081	100.00	0	0	
St Louis	12	4,827	31	19,606	43	24,433	100.00	0	0	
Youngstown-Warren-Boardman	1	3,026	1	5	2	3,031	100.00	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.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MULTISTATE OTHER AREAS Evaluation Period: AUGUST 1, 2006 to DECEMBER 15, 2008																	
MA/Assessment Area:	Deposits % of Rated Area Deposits in AA	Branches						Branch Openings/Closings						Population			
		# 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:																	
Cincinnati-Middletown	100.00	66	100	4.55	19.70	42.42	33.33	17	4		+1	+3	+10	6.80	18.14	47.69	27.27
Huntington-Ashland	100.00	11	100	0.00	27.27	54.55	18.18	0	0					0.00	6.97	71.96	21.07
Louisville-Jefferson County	100.00	62	100	4.84	19.36	40.32	35.48	2	2		+1	+1	-2	4.36	19.62	47.18	28.83
St Louis	100.00	56	100	1.79	14.29	46.43	37.49	10	5			+4	+1	5.90	19.69	48.10	26.31
Youngstown-Warren-Boardman	100.00	25	100	8.00	12.00	64.00	16.00	2	2		-1	-1	+2	4.31	15.14	62.07	18.48

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008						
MA/Assessment Area (2008):	% 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:												
West Palm Beach-Boca Raton-Boynton Beach	16.26	1,100	223,455	243	38,235	3	689	2	254	1,348	262,633	49.99
Limited Review:												
Bradenton-Sarasota-Venice	5.92	477	97,786	13	2,696	0	0	0	0	490	100,482	0.00
Deltona-Daytona Beach-Ormond Beach	6.79	542	70,440	20	1,765	0	0	0	0	562	72,205	9.30
Fort Lauderdale-Pompano Beach-Deerfield Beach	14.38	1,159	231,185	29	5,408	2	550	0	0	1,190	237,143	3.79
Naples-Marco Island	3.07	247	67,193	7	2,031	0	0	0	0	254	69,224	0.00
Orlando-Kissimmee	18.48	1,506	264,584	24	3,616	0	0	0	0	1,530	268,200	2.03
Palm Bay-Melbourne-Titusville	10.18	781	113,445	62	6,878	0	0	0	0	843	120,323	6.55
Palm Coast	0.81	66	12,261	1	50	0	0	0	0	67	12,311	.02
Port St. Lucie	16.91	1,239	189,152	159	16,677	2	160	1	250	1,401	206,239	20.27
Sebastian-Vero Beach	5.46	410	64,903	41	2,104	1	200	1	20	453	67,227	6.72
Non-Metropolitan AA	1.74	133	13,624	11	1,116	0	0	0	0	144	14,740	1.33

* Loan Data as of September 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2008.

*** Deposit Data as of February 07, 2009. 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		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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:																
West Palm Beach-Boca Raton-Boynton Beach	518	14.10	1.53	2.51	24.63	25.10	36.35	31.66	37.50	40.73	1.03	1.06	0.98	0.90	1.18	
Limited Review:																
Bradenton-Sarasota-Venice	256	6.97	0.87	0.00	13.24	12.50	63.06	60.16	22.84	27.34	0.96	0.00	0.82	0.96	1.02	
Deltona-Daytona Beach-Ormond Beach	225	6.12	0.47	0.00	9.62	4.89	74.00	71.11	15.91	24.00	1.58	0.00	1.04	1.67	1.53	
Fort Lauderdale-Pompano Beach-Deerfield Beach	524	14.26	1.16	2.29	23.67	16.60	45.93	45.23	29.24	35.88	1.06	0.71	0.83	1.08	1.24	
Naples-Marco Island	126	3.43	2.30	2.38	13.08	12.70	47.98	49.21	36.65	35.71	1.12	1.49	0.92	1.15	1.14	
Orlando-Kissimmee	788	21.45	0.69	1.65	16.51	25.89	48.43	43.27	34.37	29.19	1.03	3.61	2.01	0.91	0.77	
Palm Bay-Melbourne-Titusville	422	11.49	0.62	1.18	17.75	17.30	49.76	58.77	31.87	22.75	2.39	5.00	3.94	2.31	1.89	
Palm Coast	28	0.76	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.81	0.00	0.00	0.81	0.00	
Port St. Lucie	523	14.24	1.15	3.06	11.40	14.72	62.21	72.08	25.24	10.13	2.74	1.32	4.93	2.61	2.08	
Sebastian-Vero Beach	221	6.02	0.00	0.00	13.47	8.14	61.60	76.02	24.93	15.84	3.64	0.00	2.57	4.31	2.07	
Non-Metropolitan AA	43	1.17	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	6.48	0.00	0.00	6.48	0.00	

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008								
MA/Assessment Area:	Total Home Improvement 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	Over all	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach-Boca Raton-Boynton Beach	84	16.06	1.53	4.76	24.63	26.19	36.35	28.57	37.50	40.48	2.09	2.50	2.26	1.36	2.67
Limited Review:															
Bradenton-Sarasota-Venice	16	3.06	0.87	0.00	13.24	0.00	63.06	68.75	22.84	31.25	0.93	0.00	0.00	0.94	1.54
Deltona-Daytona Beach-Ormond Beach	62	11.85	0.47	0.00	9.62	3.23	74.00	87.10	15.91	9.68	3.14	0.00	0.65	3.68	1.89
Fort Lauderdale-Pompano Beach-Deerfield Beach	52	9.94	1.16	0.00	23.67	23.08	45.93	42.31	29.24	34.62	0.90	0.00	0.75	0.88	1.13
Naples-Marco Island	8	1.53	2.30	0.00	13.08	0.00	47.98	75.00	36.65	25.00	1.22	0.00	0.00	1.66	1.36
Orlando-Kissimmee	89	17.02	0.69	1.12	16.51	5.62	48.43	53.93	34.37	39.33	1.45	2.50	0.59	1.57	1.64
Palm Bay-Melbourne-Titusville	54	10.33	0.62	0.00	17.75	12.96	49.76	59.26	31.87	27.78	3.05	0.00	2.69	3.07	3.29
Palm Coast	2	0.38	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.70	0.00	0.00	0.70	0.00
Port St. Lucie	106	20.27	1.15	2.83	11.40	17.92	62.21	66.04	25.24	13.21	6.80	9.52	9.02	6.62	5.91
Sebastian-Vero Beach	28	5.35	0.00	0.00	13.47	10.71	61.60	78.57	24.93	10.71	6.41	0.00	8.11	6.95	3.17
Non-Metropolitan AA	22	4.21	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	12.65	0.00	0.00	12.65	0.00

* Based on 2007 Peer Mortgage Data (Eastern)

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008				
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:																					
West Palm Beach-Boca Raton-Boynton Beach	498	14.38	1.53	2.61	24.63	18.67	36.35	31.93	37.50	46.79	0.98	1.39	0.73	0.96	1.16						
Limited Review:																					
Bradenton-Sarasota-Venice	205	5.92	0.87	0.00	13.24	5.85	63.06	67.80	22.84	26.34	0.83	0.00	0.42	0.84	1.03						
Deltona-Daytona Beach-Ormond Beach	255	7.36	0.47	0.00	9.62	3.53	74.00	79.22	15.91	17.25	1.37	0.00	0.50	1.44	1.59						
Fort Lauderdale-Pompano Beach-Deerfield Beach	583	16.84	1.16	1.20	23.67	19.90	45.93	43.91	29.24	34.99	0.90	0.18	0.79	0.87	1.10						
Naples-Marco Island	113	3.26	2.30	0.88	13.08	12.39	47.98	53.10	36.65	33.63	0.91	0.84	0.73	0.86	1.07						
Orlando-Kissimmee	629	18.16	0.69	0.00	16.51	11.76	48.43	50.40	34.37	37.84	0.92	0.00	0.63	0.94	1.03						
Palm Bay-Melbourne-Titusville	305	8.81	0.62	0.33	17.75	17.38	49.76	47.54	31.87	34.75	1.56	0.93	1.87	1.34	1.90						
Palm Coast	36	1.04	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.73	0.00	0.00	0.73	0.00						
Port St. Lucie	610	17.61	1.15	0.98	11.40	9.02	62.21	75.08	25.24	14.92	3.66	2.58	3.54	3.90	2.87						
Sebastian-Vero Beach	161	4.65	0.00	0.00	13.47	7.45	61.60	73.29	24.93	19.25	3.08	0.00	2.97	3.42	2.17						
Non-Metropolitan AA	68	1.96	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	5.14	0.00	0.00	5.14	0.00						

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: FLORIDA												Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008				
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 Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
West Palm Beach-Boca Raton-Boynton Beach	242	39.74	3.42	12.40	21.29	19.83	34.64	34.30	40.49	33.47	0.13	0.56	0.15	0.13	0.09	
Limited Review:																
Bradenton-Sarasota-Venice	13	2.13	0.99	0.00	14.45	0.00	59.54	61.54	25.02	38.46	0.02	0.00	0.00	0.02	0.03	
Deltona-Daytona Beach-Ormond Beach	20	3.28	1.06	0.00	17.45	20.00	65.44	70.00	16.05	10.00	0.04	0.00	0.08	0.04	0.02	
Fort Lauderdale-Pompano Beach-Deerfield Beach	29	4.76	4.82	10.34	22.76	24.14	42.53	37.93	29.90	27.59	0.01	0.00	0.02	0.01	0.01	
Naples-Marco Island	7	1.15	1.65	0.00	11.25	0.00	44.56	28.57	42.54	71.43	0.01	0.00	0.00	0.01	0.02	
Orlando-Kissimmee	24	3.94	1.65	4.17	19.39	16.67	45.54	58.33	33.43	20.83	0.01	0.00	0.02	0.02	0.01	
Palm Bay-Melbourne-Titusville	62	10.18	1.29	0.00	24.35	37.10	45.41	38.71	28.95	24.19	0.16	0.00	0.24	0.14	0.15	
Palm Coast	1	0.16	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.02	0.00	0.00	0.02	0.00	
Port St. Lucie	159	26.11	2.67	2.52	20.82	35.22	54.94	43.40	21.58	18.87	0.43	1.11	1.00	0.34	0.23	
Sebastian-Vero Beach	41	6.73	0.00	0.00	13.25	26.83	60.33	43.90	26.42	29.27	0.34	0.00	0.80	0.27	0.33	
Non-Metropolitan AA	11	1.81	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.45	0.00	0.00	0.46	0.00	

* Based on 2007 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 (2008).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
Full Review:																
West Palm Beach-Boca Raton-Boynton Beach	3	37.50	4.10	0.00	23.00	0.00	35.39	66.67	37.47	33.33	0.31	0.00	0.00	0.95	0.00	
Limited Review:																
Bradenton-Sarasota-Venice	0	0.00	0.94	0.00	12.51	0.00	70.08	0.00	16.48	0.00	0.00	0.00	0.00	0.00	0.00	
Deltona-Daytona Beach-Ormond Beach	0	0.00	0.57	0.00	9.89	0.00	73.18	0.00	16.36	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Lauderdale-Pompano Beach-Deerfield Beach	2	25.00	4.14	0.00	23.08	0.00	42.10	100.00	30.68	0.00	0.34	0.00	0.00	0.87	0.00	
Naples-Marco Island	0	0.00	4.39	0.00	21.40	0.00	50.93	0.00	23.27	0.00	0.00	0.00	0.00	0.00	0.00	
Orlando-Kissimmee	0	0.00	0.95	0.00	18.52	0.00	52.53	0.00	28.01	0.00	0.00	0.00	0.00	0.00	0.00	
Palm Bay-Melbourne-Titusville	0	0.00	1.01	0.00	19.55	0.00	52.42	0.00	27.02	0.00	0.00	0.00	0.00	0.00	0.00	
Palm Coast	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	
Port St. Lucie	2	25.00	1.72	0.00	20.34	0.00	56.37	0.00	21.57	100.00	0.79	0.00	0.00	0.00	3.85	
Sebastian-Vero Beach	1	12.50	0.00	0.00	15.49	0.00	63.13	0.00	21.39	100.00	1.67	0.00	0.00	0.00	6.67	
Non-Metropolitan AA	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	

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008				
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:																								
West Palm Beach-Boca Raton-Boynton Beach	518	14.10	19.86	5.92	18.56	17.76	20.60	19.87	40.98	56.45	1.09	2.03	0.93	0.86	1.15									
Limited Review:																								
Bradenton-Sarasota-Venice	256	6.97	17.16	1.31	19.96	9.17	23.32	16.59	39.56	72.93	1.05	0.71	0.66	1.11	1.08									
Deltona-Daytona Beach-Ormond Beach	225	6.12	17.44	6.03	19.60	26.13	23.44	31.16	39.51	36.68	1.59	4.05	3.20	2.26	0.97									
Fort Lauderdale-Pompano Beach-Deerfield Beach	524	14.26	20.85	0.42	18.17	8.90	20.48	20.55	40.50	70.13	1.15	0.18	0.61	1.02	1.28									
Naples-Marco Island	126	3.43	19.06	1.77	19.32	5.31	20.65	10.62	40.97	82.30	1.22	1.39	0.78	0.47	1.35									
Orlando-Kissimmee	788	21.45	18.32	6.96	18.47	24.23	22.39	24.51	40.82	44.29	1.12	3.48	2.57	1.23	0.85									
Palm Bay-Melbourne-Titusville	422	11.49	18.27	10.24	19.30	23.36	22.67	27.82	39.76	38.58	2.48	4.58	3.56	2.34	2.15									
Palm Coast	28	0.76	17.10	12.50	20.20	8.33	23.28	16.67	39.41	62.50	0.81	4.17	1.12	0.80	0.73									
Port St. Lucie	523	14.24	18.46	13.16	19.34	25.05	22.19	27.60	40.01	34.18	2.88	17.02	8.05	3.54	1.81									
Sebastian-Vero Beach	221	6.02	17.61	11.79	19.63	28.72	22.39	22.05	40.37	37.44	3.73	16.28	7.97	4.29	2.33									
Non-Metropolitan AA	43	1.17	20.20	2.50	19.90	25.00	22.47	30.00	37.43	42.50	6.72	10.00	11.11	4.80	6.62									

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 9.8% 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: FLORIDA Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008															
MA/Assessment Area:	Total Home Improvement 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:															
West Palm Beach-Boca Raton-Boynton Beach	84	16.06	19.86	10.85	18.56	15.66	20.60	20.48	40.98	53.01	2.15	3.90	1.19	1.67	2.45
Limited Review:															
Bradenton-Sarasota-Venice	16	3.06	17.16	0.00	19.96	13.33	23.32	6.67	39.56	80.00	0.91	0.00	1.13	0.00	1.27
Deltona-Daytona Beach-Ormond Beach	62	11.85	17.44	5.26	19.60	29.82	23.44	12.28	39.51	52.63	2.95	1.43	3.25	2.30	3.28
Fort Lauderdale-Pompano Beach-Deerfield Beach	52	9.94	20.85	1.96	18.17	5.88	20.48	13.73	40.50	78.43	0.93	0.60	0.34	0.25	1.39
Naples-Marco Island	8	1.53	19.06	0.00	19.32	25.00	20.65	25.00	40.97	50.00	1.33	0.00	2.08	0.57	1.62
Orlando-Kissimmee	89	17.02	18.32	4.71	18.47	17.65	22.39	16.47	40.82	61.18	1.43	1.03	1.40	1.10	1.62
Palm Bay-Melbourne-Titusville	54	10.33	18.27	19.23	19.30	26.92	22.67	28.85	39.76	25.00	3.01	5.00	3.24	3.33	2.44
Palm Coast	2	0.38	17.10	0.00	20.20	0.00	23.28	0.00	39.41	100.00	0.73	0.00	0.00	0.00	1.37
Port St. Lucie	106	20.27	18.46	14.56	19.34	18.45	22.19	24.27	40.01	42.72	6.82	10.39	8.38	4.93	6.82
Sebastian-Vero Beach	28	5.35	17.61	14.81	19.63	25.93	22.39	11.11	40.37	48.15	6.30	18.18	4.84	3.26	6.94
Non-Metropolitan AA	22	4.21	20.20	9.09	19.90	27.27	22.47	22.73	37.43	40.91	12.88	33.33	25.00	17.95	7.84

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by bank.

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Up p	
Full Review:																
West Palm Beach-Boca Raton-Boynton Beach	498	14.38	19.86	5.03	18.56	13.79	20.60	18.16	40.98	63.02	1.05	1.46	0.55	0.87	1.22	
Limited Review:																
Bradenton-Sarasota-Venice	205	5.92	17.16	0.56	19.96	6.74	23.32	20.79	39.56	71.91	0.91	0.21	0.36	0.62	1.12	
Deltona-Daytona Beach-Ormond Beach	255	7.36	17.44	10.22	19.60	19.11	23.44	24.00	39.51	46.67	1.38	1.65	1.30	1.13	1.50	
Fort Lauderdale-Pompano Beach-Deerfield Beach	583	16.84	20.85	3.31	18.17	12.28	20.48	22.42	40.50	61.99	0.95	0.43	0.64	0.75	1.12	
Naples-Marco Island	113	3.26	19.06	2.91	19.32	6.80	20.65	15.53	40.97	74.76	1.02	0.54	0.31	0.39	1.37	
Orlando-Kissimmee	629	18.16	18.32	3.80	18.47	14.83	22.39	24.59	40.82	56.78	0.94	0.67	0.61	0.81	1.11	
Palm Bay-Melbourne-Titusville	305	8.81	18.27	8.96	19.30	19.78	22.67	29.10	39.76	42.16	1.59	1.77	1.29	1.64	1.67	
Palm Coast	36	1.04	17.10	0.00	20.20	15.15	23.28	33.33	39.41	51.52	0.80	0.00	1.32	0.99	0.64	
Port St. Lucie	610	17.61	18.46	10.73	19.34	22.36	22.19	23.82	40.01	43.09	3.85	6.00	5.30	3.83	3.41	
Sebastian-Vero Beach	161	4.65	17.61	6.54	19.63	16.99	22.39	32.03	40.37	44.44	3.33	2.79	2.67	4.14	3.22	
Non-Metropolitan AA	68	1.96	20.20	10.77	19.90	20.00	22.47	20.00	37.43	49.23	5.57	10.34	9.21	4.42	5.05	

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 10.5% 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.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008				
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:									
West Palm Beach-Boca Raton-Boynton Beach	243	39.84	65.34	55.56	61.73	17.70	20.58	0.13	0.24
Limited Review:									
Bradenton-Sarasota-Venice	13	2.13	64.79	23.08	46.15	15.38	38.46	0.02	0.02
Deltona-Daytona Beach-Ormond Beach	20	3.28	67.75	55.00	80.00	15.00	5.00	0.04	0.07
Fort Lauderdale-Pompano Beach-Deerfield Beach	29	4.75	66.53	37.93	48.28	20.69	31.03	0.01	0.01
Naples-Marco Island	7	1.15	64.91	28.57	14.29	57.14	28.57	0.01	0.00
Orlando-Kissimmee	24	3.93	64.04	37.50	54.17	20.83	25.00	0.01	0.01
Palm Bay-Melbourne-Titusville	62	10.16	65.40	53.23	64.52	20.97	14.52	0.16	0.22
Palm Coast	1	0.16	66.11	0.00	100.00	0.00	0.00	0.02	0.00
Port St. Lucie	159	26.07	66.99	52.83	70.44	17.61	11.95	0.43	0.56
Sebastian-Vero Beach	41	6.72	65.38	43.90	90.24	4.88	4.88	0.34	0.27
Non-Metropolitan AA	11	1.80	62.47	63.64	63.64	27.27	9.09	0.45	0.48

* Based on 2007 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 - 2008).

**** 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 8.85% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2007 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% 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:									
West Palm Beach-Boca Raton-Boynton Beach	3	37.50	94.73	66.67	0.00	66.67	33.33	0.31	0.45
Limited Review:									
Bradenton-Sarasota-Venice	0	0.00	97.14	0.00	0.00	0.00	0.00	0.00	0.00
Deltona-Daytona Beach-Ormond Beach	0	0.00	97.67	0.00	0.00	0.00	0.00	0.00	0.00
Fort Lauderdale-Pompano Beach-Deerfield Beach	2	25.00	96.87	0.00	0.00	50.00	50.00	0.34	0.00
Naples-Marco Island	0	0.00	94.49	0.00	0.00	0.00	0.00	0.00	0.00
Orlando-Kissimmee	0	0.00	95.60	0.00	0.00	0.00	0.00	0.00	0.00
Palm Bay-Melbourne-Titusville	0	0.00	98.37	0.00	0.00	0.00	0.00	0.00	0.00
Palm Coast	0	0.00	96.85	0.00	0.00	0.00	0.00	0.00	0.00
Port St. Lucie	2	25.00	94.00	0.00	100.00	0.00	0.00	0.79	0.00
Sebastian-Vero Beach	1	12.50	92.18	0.00	0.00	100.00	0.00	1.67	0.00
Non-Metropolitan AA	0	0.00	87.64	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 50.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 15, 2008			
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:									
West Palm Beach- Boca Raton-Boynton Beach	0	0	26	6,426	26	6,426	78.73	0	0
Limited Review:									
Bradenton-Sarasota- Venice	0	0	0	0	0	0	0.00	0	0
Deltona-Daytona Beach-Ormond Beach	0	0	0	0	0	0	0.00	0	0
Fort Lauderdale- Pompano Beach- Deerfield Beach	0	0	0	0	0	0	0.00	0	0
Naples-Marco Island	0	0	0	0	0	0	0.00	0	0
Orlando-Kissimmee	0	0	0	0	0	0	0.00	0	0
Palm Bay-Melborune- Titusville	0	0	1	1,250	1	1,250	15.32	0	0
Palm Coast	0	0	0	0	0	0	0.00	0	0
Port St Lucie	0	0	22	486	22	486	5.95	0	0
Sebastian-Vero Beach	0	0	0	0	0	0	0.00	0	0
Non-Metropolitan AA	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.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: FLORIDA Evaluation Period: JANUARY 1, 2007 to DECEMBER 15, 2008																	
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:																	
West Palm Beach-Boca Raton-Boynton Beach	49.99	46	42.20	4.35	21.74	43.48	30.43	1	0				+1	4.21	29.32	33.88	32.37
Bradenton-Sarasota-Venice	0.00	1	0.92	0.00	0.00	100.0	0.00	1	0			+1		1.95	17.89	61.13	19.03
Deltona-Daytona Beach-Ormond Beach	9.30	8	7.34	0.00	12.50	62.50	25.00	1	0			+1		0.99	15.06	69.38	14.57
Fort Lauderdale-Pompano Beach-Deerfield Beach	3.79	5	4.59	20.00	20.00	20.00	40.00	0	0					3.57	26.43	43.13	26.88
Naples-Marco Island	0.00	1	0.92	0.00	0.00	0.00	100.0	1	0				+1	7.48	18.77	45.24	28.51
Orlando-Kissimmee	2.03	7	6.42	0.00	14.29	57.14	28.57	1	0			+1		1.82	20.87	47.30	30.01
Palm Bay-Melbourne-Titusville	6.55	11	10.09	0.00	18.18	36.36	45.46	2	0			+2		1.34	19.21	51.27	28.17
Palm Coast	0.02	2	1.83	0.00	0.00	100.0	0.00	2	0			+2		0.00	0.00	100.0	0.00
Port St. Lucie	20.27	21	19.27	4.76	14.28	71.43	9.53	3	0			+3		3.58	17.57	57.55	21.31
Sebastian-Vero Beach	6.72	6	5.50	0.00	0.00	83.33	16.67	0	0					0.00	16.49	61.66	21.84
Non-Metropolitan AA	1.33	1	0.92	0.00	0.00	100.0	0.00	0	0					0.00	0.00	100.0	0.00

Table 1. Lending Volume

LENDING VOLUME		Geography: ILLINOIS				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008						
MA/Assessment Area (2008):	% 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:												
Peoria	31.42	3,914	440,915	512	32,123	9	902	3	5,637	4,438	479,577	23.61
Limited Review:												
Bloomington-Normal	20.83	2,747	343,290	188	15,612	6	927	1	362	2,942	360,191	14.46
Champaign-Urbana	6.66	854	96,881	86	6,855	0	0	1	284	941	104,020	10.59
Decatur	8.96	1,165	95,730	100	5,848	0	0	1	4,500	1,266	106,078	6.92
Kankakee-Bradley	5.18	655	78,058	75	5,509	1	80	0	0	731	83,647	9.00
Rockford	14.08	1,701	185,731	286	17,292	1	18	1	250	1,989	203,291	16.74
Springfield	12.37	1,540	137,651	204	17,644	1	10	3	2,700	1,748	158,005	16.87
Non-Metropolitan AA	0.50	54	4,378	16	876	0	0	0	0	70	5,254	1.81

* Loan Data as of September 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2008.

*** Deposit Data as of March 13, 2009. 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		Geography: ILLINOIS				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008									
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:															
Peoria	2,934	41.58	3.30	1.26	10.41	9.48	64.42	63.22	21.87	26.04	17.67	15.08	16.63	17.93	17.57
Limited Review:															
Bloomington-Normal	1,754	76.93	0.00	0.34	21.24	25.37	55.27	48.92	23.49	25.37	20.11	30.77	21.07	20.89	18.14
Champaign-Urbana	526	7.45	0.91	0.19	18.58	16.16	52.37	59.13	28.13	24.52	6.05	0.00	6.88	6.29	5.30
Decatur	898	12.72	3.18	1.11	21.90	16.70	50.66	57.13	24.26	25.06	16.70	16.67	15.16	17.97	15.24
Kankakee-Bradley	385	5.46	1.40	1.56	9.84	9.35	74.97	76.88	13.79	12.21	8.29	8.70	8.73	8.09	9.15
Rockford	1,086	15.39	1.40	2.21	14.80	16.39	59.49	59.94	24.30	21.45	5.87	5.16	6.68	5.89	5.37
Springfield	1,114	15.79	2.60	3.86	20.47	23.52	40.90	41.56	36.04	31.06	13.22	30.38	16.79	14.31	10.06
Non-Metropolitan AA	34	0.48	0.00	0.00	8.22	17.65	76.77	73.53	15.00	8.82	4.87	0.00	6.06	5.49	1.64

* Based on New Folder (001)\filter 2007 west

** 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: ILLINOIS Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008															
MA/Assessment Area:	Total Home Improvement 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	Over all	Low	Mod	Mid	Upp
Full Review:															
Peoria	126	33.96	3.30	3.17	10.41	10.32	64.42	61.11	21.87	25.40	6.52	6.67	5.67	5.48	10.34
Limited Review:															
Bloomington-Normal	98	69.50	0.00	1.02	21.24	20.41	55.27	46.94	23.49	31.63	11.45	0.00	9.59	11.74	12.03
Champaign-Urbana	43	11.59	0.91	2.33	18.58	18.60	52.37	51.16	28.13	27.91	4.00	0.00	6.09	2.38	6.96
Decatur	42	11.32	3.18	0.00	21.90	19.05	50.66	57.14	24.26	23.81	7.36	0.00	7.41	7.41	7.69
Kankakee-Bradley	44	11.86	1.40	2.27	9.84	18.18	74.97	70.45	13.79	9.09	5.56	20.00	9.76	5.24	3.95
Rockford	52	14.02	1.40	1.92	14.80	11.54	59.49	57.69	24.30	28.85	2.46	6.25	1.18	2.57	2.67
Springfield	59	15.90	2.60	0.00	20.47	28.81	40.90	49.15	36.04	22.03	3.51	0.00	5.88	4.43	1.79
Non-Metropolitan AA	2	0.54	0.00	0.00	8.22	0.00	76.77	50.00	15.00	50.00	2.06	0.00	0.00	1.33	7.69

* Based on New Folder (001)\filter 2007 west

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: ILLINOIS					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
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	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Peoria	854	33.17	3.30	0.82	10.41	8.20	64.42	59.72	21.87	31.26	5.36	3.16	3.74	4.96	7.20						
Limited Review:																					
Bloomington-Normal	895	75.85	0.00	0.22	21.24	22.12	55.27	47.04	23.49	30.61	11.07	28.57	13.37	11.26	9.13						
Champaign-Urbana	285	11.07	0.91	1.05	18.58	18.25	52.37	55.09	28.13	25.61	4.14	7.32	4.83	3.65	4.66						
Decatur	225	8.74	3.18	1.78	21.90	14.22	50.66	51.11	24.26	32.89	6.15	9.09	6.28	5.98	6.22						
Kankakee-Bradley	226	8.78	1.40	0.88	9.84	4.42	74.97	74.34	13.79	20.35	3.97	6.67	3.26	3.89	4.65						
Rockford	563	21.86	1.40	0.53	14.80	11.01	59.49	59.86	24.30	28.60	2.90	2.80	2.77	2.83	3.13						
Springfield	367	14.25	2.60	2.45	20.47	16.89	40.90	37.60	36.04	43.05	3.86	3.28	5.35	3.55	3.73						
Non-Metropolitan AA	18	0.70	0.00	0.00	8.22	5.56	76.77	83.33	15.00	11.11	3.74	0.00	0.00	4.07	3.33						

* Based on New Folder (001)\filter 2007 west

** 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: ILLINOIS				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
Full Review:																
Peoria	512	39.84	9.51	13.48	12.14	9.38	56.01	44.14	22.33	33.01	2.43	4.64	2.55	1.84	3.33	
Limited Review:																
Bloomington-Normal	188	69.37	0.58	1.60	23.62	15.43	59.57	52.66	16.22	30.32	2.08	4.35	2.07	1.83	2.82	
Champaign-Urbana	83	6.46	4.91	4.82	28.22	14.46	43.81	53.01	20.92	27.71	0.54	0.27	0.14	0.63	0.86	
Decatur	100	7.78	13.92	13.00	30.59	26.00	36.38	38.00	19.11	23.00	2.12	2.52	1.93	1.93	2.55	
Kankakee-Bradley	75	5.84	1.88	0.00	17.45	8.00	71.74	78.67	8.93	13.33	1.16	0.00	1.09	1.19	1.35	
Rockford	286	22.26	4.42	1.75	17.09	17.48	54.87	51.40	23.62	29.37	1.29	0.00	1.91	1.30	1.18	
Springfield	204	15.88	9.48	2.94	26.63	27.45	31.43	32.84	32.45	36.76	1.76	1.44	2.42	1.48	1.75	
Non-Metropolitan AA	16	1.25	0.00	0.00	8.41	6.25	78.64	37.50	12.95	56.25	1.00	0.00	0.00	0.43	5.56	

* Based on 2007 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 (2008).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans						
Full Review:																
Peoria	9	75.00	0.68	0.00	2.46	0.00	79.33	66.67	17.52	33.33	0.89	0.00	0.00	0.81	2.00	
Limited Review:																
Bloomington-Normal	6	100.00	0.00	0.00	6.42	0.00	73.09	66.67	20.49	33.33	0.61	0.00	0.00	0.52	1.20	
Champaign-Urbana	0	0.00	0.72	0.00	6.94	0.00	82.30	0.00	9.81	0.00	0.00	0.00	0.00	0.00	0.00	
Decatur	0	0.00	0.71	0.00	8.79	0.00	70.55	0.00	19.95	0.00	0.00	0.00	0.00	0.00	0.00	
Kankakee-Bradley	1	8.33	0.00	0.00	4.34	0.00	84.42	100.00	11.24	0.00	0.00	0.00	0.00	0.00	0.00	
Rockford	1	8.33	0.35	0.00	6.97	0.00	60.76	100.00	31.91	0.00	0.00	0.00	0.00	0.00	0.00	
Springfield	1	8.33	1.79	0.00	9.23	0.00	59.82	100.00	29.17	0.00	0.00	0.00	0.00	0.00	0.00	
Non-Metropolitan AA	0	0.00	0.00	0.00	1.43	0.00	92.14	0.00	6.43	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS								Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					
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:															
Peoria	2,934	41.58	18.93	17.19	18.48	30.92	23.85	26.41	38.74	25.48	18.90	20.88	24.60	18.96	14.24
Limited Review:															
Bloomington-Normal	1,754	76.93	17.41	17.81	18.87	28.70	26.57	26.95	37.15	26.54	22.48	30.70	26.95	21.91	16.77
Champaign-Urbana	526	7.45	18.12	8.40	18.34	26.37	24.52	27.93	39.02	37.30	6.70	9.76	6.82	7.13	5.84
Decatur	898	12.72	20.06	20.47	18.49	31.61	22.27	25.42	39.18	22.50	18.95	24.20	23.06	21.37	12.58
Kankakee-Bradley	385	5.46	19.07	8.73	18.85	29.37	23.04	32.28	39.04	29.63	9.46	9.22	13.06	11.56	6.32
Rockford	1,086	15.39	18.51	15.70	18.84	31.69	24.28	29.07	38.36	23.55	6.04	7.36	7.49	6.04	4.59
Springfield	1,114	15.79	18.59	22.13	18.94	31.24	23.76	25.96	38.71	20.67	13.73	18.50	18.34	14.55	8.05
Non-Metropolitan AA	34	0.48	14.81	11.76	19.54	32.35	24.21	26.47	41.43	29.41	5.21	4.88	6.10	4.44	5.31

* Based on New Folder (001)\filter 2007 west

** As a percentage of loans with borrower income information available. No information was available for 1.9% 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT				Geography: ILLINOIS				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp		
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****							
Full Review:																	
Peoria	126	33.96	18.93	8.06	18.48	20.97	23.85	33.87	38.74	37.10	6.58	5.03	5.88	6.49	7.71		
Limited Review:																	
Bloomington-Normal	98	69.50	17.41	12.24	18.87	26.53	26.57	24.49	37.15	36.73	11.71	10.87	16.82	11.54	9.09		
Champaign-Urbana	43	11.59	18.12	6.98	18.34	20.93	24.52	30.23	39.02	41.86	4.08	1.92	3.11	4.57	4.71		
Decatur	42	11.32	20.06	9.52	18.49	38.10	22.27	35.71	39.18	16.67	7.48	2.70	6.76	15.58	3.77		
Kankakee-Bradley	44	11.86	19.07	11.63	18.85	27.91	23.04	27.91	39.04	32.56	5.87	10.71	7.79	6.25	4.39		
Rockford	52	14.02	18.51	13.46	18.84	23.08	24.28	42.31	38.36	21.15	2.56	2.04	3.25	2.60	2.28		
Springfield	59	15.90	18.59	12.28	18.94	28.07	23.76	31.58	38.71	28.07	3.47	4.49	4.68	3.03	2.95		
Non-Metropolitan AA	2	0.54	14.81	50.00	19.54	0.00	24.21	50.00	41.43	0.00	2.13	6.25	0.00	3.45	0.00		

* Based on New Folder (001)\filter 2007 west

** As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by bank.

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
Full Review:																
Peoria	854	33.17	18.93	10.03	18.48	23.18	23.85	27.69	38.74	39.10	5.75	4.42	5.74	6.00	5.92	
Limited Review:																
Bloomington-Normal	895	75.85	17.41	9.16	18.87	19.50	26.57	29.61	37.15	41.74	12.38	15.87	13.90	12.93	10.46	
Champaign-Urbana	285	11.07	18.12	10.04	18.34	18.64	24.52	25.45	39.02	45.88	4.73	5.67	4.74	4.35	4.80	
Decatur	225	8.74	20.06	11.76	18.49	25.49	22.27	26.96	39.18	35.78	6.08	9.02	6.81	5.71	5.29	
Kankakee-Bradley	226	8.78	19.07	11.16	18.85	18.14	23.04	24.65	39.04	46.05	4.17	9.15	4.73	3.64	3.51	
Rockford	563	21.86	18.51	8.20	18.84	20.90	24.28	32.03	38.36	38.87	2.92	2.60	2.36	2.73	3.42	
Springfield	367	14.25	18.59	12.72	18.94	26.33	23.76	28.40	38.71	32.54	3.92	7.07	4.64	3.45	3.15	
Non-Metropolitan AA	18	0.70	14.81	6.67	19.54	13.33	24.21	33.33	41.43	46.67	3.26	5.56	0.00	2.44	4.96	

* Based on New Folder (001)\filter 2007 west

** As a percentage of loans with borrower income information available. No information was available for 7.1% 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.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS			Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
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:									
Peoria	512	39.75	63.15	53.71	84.77	9.18	6.05	2.43	3.05
Limited Review:									
Bloomington-Normal	188	68.61	61.99	54.26	83.51	5.85	10.64	2.08	2.79
Champaign-Urbana	86	6.68	63.87	77.91	82.56	8.14	9.30	0.54	1.00
Decatur	100	7.76	62.89	78.00	91.00	5.00	4.00	2.12	3.92
Kankakee-Bradley	75	5.82	64.79	72.00	86.67	5.33	8.00	1.16	2.03
Rockford	286	22.20	66.81	80.07	87.06	9.44	3.50	1.29	2.91
Springfield	204	15.84	61.85	75.98	80.88	10.78	8.33	1.76	3.63
Non-Metropolitan AA	16	1.24	56.26	56.25	87.50	6.25	6.25	1.00	1.66

* Based on 2007 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 - 2008).

**** 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 3.49% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS			Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% 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:									
Peoria	9	75.00	97.95	100.00	66.67	33.33	0.00	0.89	0.99
Limited Review:									
Bloomington-Normal	6	100.00	98.15	100.00	0.00	100.00	0.00	0.61	0.66
Champaign-Urbana	0	0.00	98.09	0.00	0.00	0.00	0.00	0.00	0.00
Decatur	0	0.00	97.62	0.00	0.00	0.00	0.00	0.00	0.00
Kankakee-Bradley	1	8.33	97.63	0.00	100.00	0.00	0.00	0.00	0.00
Rockford	1	8.33	96.81	100.00	100.00	0.00	0.00	0.00	0.00
Springfield	1	8.33	97.92	100.00	100.00	0.00	0.00	0.00	0.00
Non-Metropolitan AA	0	0.00	99.29	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 8.33% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ILLINOIS				Evaluation Period: AUGUST 1, 2006 TO DECEMBER 15, 2008			
FIRED INVESTMENTS		Geography: ILLINOIS				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008			
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:									
Peoria	1	137	9	198	10	335	2.47	0	0
Limited Review:									
Bloomington-Normal	1	903	6	186	7	1,089	8.02	0	0
Champaign-Urbana	0	0	2	20	2	20	0.15	0	0
Decatur	3	3,990	3	32	6	4,022	29.63	0	0
Kankakee-Bradley	0	0	0	0	0	0	0.00	0	0
Rockford	2	174	2	2,027	4	2,201	16.21	0	0
Springfield	0	0	3	78	3	78	0.57	0	0
Non-Metropolitan AA	0	0	0	0	0	0	0.00	0	0
Statewide – Potential to Benefit One or More AAs	7	3,593	1	710	8	4,303	31.70		
Regional Investments – Potential to Benefit One or More AAs	2	1,527	0	0	2	1,527	11.25	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: ILLINOIS Evaluation Period: AUGUST 1, 2006 to DECEMBER 15, 2008																		
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:																		
Peoria	23.61	12	26.67	8.33	0.00	66.67	25.00	1	0				+1		6.22	13.03	59.85	20.89
Limited Review:																		
Bloomington-Normal	14.46	7	15.56	0.00	28.57	57.14	14.29	0	0						5.16	22.68	53.48	18.67
Champaign	10.59	4	8.89	25.00	25.00	25.00	25.00	0	0						6.19	28.70	44.32	20.69
Decatur	6.92	3	6.67	33.33	33.33	33.34	0.00	0	0						6.43	27.76	44.95	20.87
Kankakee	9.00	4	8.89	0.00	25.00	75.00	0.00	0	0						2.31	15.38	69.99	12.32
Rockford	16.74	8	17.77	0.00	37.50	37.50	25.00	0	0						3.72	19.51	55.62	21.15
Springfield	16.87	6	13.33	33.33	16.67	0.00	50.00	0	0						5.38	23.74	38.50	32.38
Non-Metropolitan AA	1.81	1	2.22	0.00	0.00	100.0	0.00	0	0						0.00	10.57	76.80	12.63

Table 1. Lending Volume

LENDING VOLUME		Geography: INDIANA				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008						
MA/Assessment Area (2008):	% 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:												
Indianapolis-Carmel	50.61	5,637	676,707	2,794	245,885	84	8,740	2	5,087	8,517	936,419	59.05
Limited Review:												
Anderson	4.72	593	44,851	200	11,030	1	150	0	0	794	56,031	5.71
Bloomington	.77	120	14,742	9	2,191	0	0	0	0	129	16,933	0.00
Columbus	1.74	190	20,214	85	7,713	17	1,360	0	0	292	29,287	0.86
Elkhart-Goshen	4.13	508	50,097	182	30,105	3	232	2	743	695	81,177	0.88
Fort Wayne	12.70	1,299	116,621	758	63,538	80	7,501	1	242	2,138	187,902	12.20
Kokomo	2.23	307	25,384	62	2,814	7	663	0	0	376	28,861	2.58
Michigan City-LaPorte	2.60	349	40,375	89	4,122	0	0	0	0	438	44,497	2.34
South Bend-Mishawaka	6.20	709	73,321	328	24,718	6	1,612	0	0	1,043	99,651	4.72
Non-Metropolitan AA	14.30	1,803	162,710	511	42,642	92	9,936	0	0	2,406	215,288	11.66

* Loan Data as of September 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2008.

*** Deposit Data as of February 08, 2009. 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		Geography: INDIANA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Indianapolis-Carmel	3,108	41.86	3.11	3.47	19.49	14.48	47.47	50.42	29.94	31.63	3.24	4.78	3.20	3.46	2.91	
Limited Review:																
Anderson	285	3.84	2.46	0.70	13.30	7.02	52.79	58.95	31.45	33.33	6.13	0.00	5.08	6.30	6.28	
Bloomington	80	1.08	0.77	3.75	8.38	13.75	54.51	52.50	36.34	30.00	1.83	1.82	2.68	1.60	1.88	
Columbus	103	1.39	0.00	0.00	11.17	18.45	70.83	66.02	18.00	15.53	3.18	0.00	5.35	3.16	2.23	
Elkhart-Goshen	345	4.65	0.06	0.00	2.92	2.90	90.58	91.01	6.44	6.09	4.38	0.00	4.63	4.43	3.56	
Fort Wayne	802	10.80	0.75	0.62	18.24	18.58	58.40	56.61	22.61	24.19	3.96	5.26	3.74	4.54	3.11	
Kokomo	166	2.24	0.00	0.00	22.01	19.88	56.36	60.24	21.63	19.88	3.65	0.00	2.88	4.40	2.60	
Michigan City-LaPorte	170	2.29	0.00	0.00	13.50	16.47	69.17	62.94	17.33	20.59	3.93	0.00	3.58	3.44	6.80	
South Bend-Mishawaka	444	5.98	1.29	1.13	19.73	18.02	51.29	53.83	27.68	27.03	3.72	1.54	2.85	4.46	3.19	
Non-Metropolitan AA	1,070	14.41	0.00	0.00	1.68	2.24	86.82	86.26	11.50	11.50	7.49	0.00	13.83	7.55	6.56	

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: INDIANA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Indianapolis-Carmel	361	44.19	3.11	4.71	19.49	21.88	47.47	45.71	29.94	27.70	5.70	10.29	6.75	5.44	4.99	
Limited Review:																
Anderson	63	7.71	2.46	1.59	13.30	4.76	52.79	53.97	31.45	39.68	10.12	0.00	3.92	10.47	12.82	
Bloomington	3	0.37	0.77	0.00	8.38	0.00	54.51	66.67	36.34	33.33	1.02	0.00	0.00	1.10	1.05	
Columbus	6	0.73	0.00	0.00	11.17	0.00	70.83	100.00	18.00	0.00	1.50	0.00	0.00	2.15	0.00	
Elkhart-Goshen	23	2.82	0.06	0.00	2.92	4.35	90.58	86.96	6.44	8.70	1.88	0.00	0.00	1.85	2.78	
Fort Wayne	94	11.51	0.75	2.13	18.24	25.53	58.40	60.64	22.61	11.70	4.45	14.29	7.45	4.40	2.04	
Kokomo	22	2.69	0.00	0.00	22.01	22.73	56.36	54.55	21.63	22.73	4.20	0.00	3.77	4.96	2.27	
Michigan City-LaPorte	33	4.04	0.00	0.00	13.50	9.09	69.17	69.70	17.33	21.21	5.38	0.00	4.17	5.62	5.26	
South Bend-Mishawaka	44	5.39	1.29	4.55	19.73	11.36	51.29	59.09	27.68	25.00	2.44	10.00	1.42	2.31	3.08	
Non-Metropolitan AA	108	13.22	0.00	0.00	1.68	1.85	86.82	87.96	11.50	10.19	5.02	0.00	8.33	5.14	3.92	

* Based on 2007 Peer Mortgage Data (Eastern)

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: INDIANA															
Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008															
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis-Carmel	2,167	47.01	3.11	2.54	19.49	13.29	47.47	47.67	29.94	36.50	3.36	2.98	3.24	3.28	3.55
Limited Review:															
Anderson	245	5.31	2.46	2.04	13.30	9.39	52.79	50.20	31.45	38.37	5.26	18.18	2.53	5.58	5.43
Bloomington	37	0.80	0.77	0.00	8.38	13.51	54.51	59.46	36.34	27.03	0.83	0.00	1.78	0.75	0.76
Columbus	81	1.76	0.00	0.00	11.17	9.88	70.83	64.20	18.00	25.93	2.35	0.00	1.60	2.30	3.00
Elkhart-Goshen	140	3.04	0.06	0.00	2.92	5.00	90.58	87.86	6.44	7.14	1.99	0.00	2.91	1.94	2.13
Fort Wayne	403	8.74	0.75	0.25	18.24	15.14	58.40	53.10	22.61	31.51	2.93	0.00	2.70	2.95	3.07
Kokomo	119	2.58	0.00	0.00	22.01	10.92	56.36	59.66	21.63	29.41	2.92	0.00	1.98	3.13	3.31
Michigan City-LaPorte	146	3.17	0.00	0.00	13.50	12.33	69.17	62.33	17.33	25.34	2.80	0.00	2.09	2.62	3.99
South Bend-Mishawaka	221	4.79	1.29	0.00	19.73	12.22	51.29	52.94	27.68	34.84	2.43	0.00	1.19	2.78	2.62
Non-Metropolitan AA	625	13.56	0.00	0.00	1.68	1.92	86.82	84.00	11.50	14.08	3.99	0.00	5.81	3.88	4.52

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: INDIANA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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:																
Indianapolis-Carmel	1	100.00	6.88	0.00	32.03	0.00	47.12	100.00	13.96	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Anderson	0	0.00	1.95	0.00	13.44	0.00	76.21	0.00	8.40	0.00	0.00	0.00	0.00	0.00	0.00	
Bloomington	0	0.00	25.20	0.00	18.67	0.00	33.44	0.00	22.69	0.00	0.00	0.00	0.00	0.00	0.00	
Columbus	0	0.00	0.00	0.00	35.23	0.00	47.85	0.00	16.91	0.00	0.00	0.00	0.00	0.00	0.00	
Elkhart-Goshen	0	0.00	2.97	0.00	7.24	0.00	85.35	0.00	4.44	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Wayne	0	0.00	2.56	0.00	37.96	0.00	53.27	0.00	6.21	0.00	0.00	0.00	0.00	0.00	0.00	
Kokomo	0	0.00	0.00	0.00	38.90	0.00	53.50	0.00	7.60	0.00	0.00	0.00	0.00	0.00	0.00	
Michigan City-LaPorte	0	0.00	0.00	0.00	43.62	0.00	48.85	0.00	7.54	0.00	0.00	0.00	0.00	0.00	0.00	
South Bend-Mishawaka	0	0.00	2.28	0.00	30.66	0.00	42.25	0.00	24.82	0.00	0.00	0.00	0.00	0.00	0.00	
Non-Metropolitan AA	0	0.00	0.00	0.00	0.82	0.00	89.50	0.00	9.68	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2007 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.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: INDIANA				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
Full Review:																
Indianapolis-Carmel	2,793	53.91	4.03	1.93	18.13	16.79	47.10	47.23	30.63	34.05	2.79	2.74	3.58	2.94	2.46	
Limited Review:																
Anderson	200	3.86	2.24	2.00	18.28	9.50	54.56	56.00	24.92	32.50	4.35	2.33	3.05	4.75	4.74	
Bloomington	9	0.17	15.93	22.22	13.28	22.22	44.00	33.33	26.79	22.22	0.10	0.19	0.21	0.06	0.08	
Columbus	85	1.64	0.00	0.00	29.51	24.71	55.28	55.29	15.21	20.00	1.63	0.00	2.04	1.84	0.75	
Elkhart-Goshen	182	3.51	4.03	2.75	5.36	3.85	86.08	88.46	4.53	4.95	1.64	1.75	3.23	1.70	0.37	
Fort Wayne	757	14.61	1.36	0.79	26.45	35.67	52.37	43.73	19.74	19.82	2.66	3.57	4.66	2.29	2.09	
Kokomo	62	1.20	0.00	0.00	32.13	32.26	52.58	40.32	15.29	27.42	1.04	0.00	1.06	1.08	1.00	
Michigan City-LaPorte	89	1.72	0.00	0.00	30.55	29.21	58.25	52.81	11.20	17.98	1.38	0.00	1.31	1.32	1.97	
South Bend-Mishawaka	328	6.33	2.03	1.83	28.23	25.00	46.22	47.56	23.52	25.61	2.27	4.26	2.91	2.39	1.73	
Non-Metropolitan AA	511	9.86	0.00	0.00	1.76	0.59	88.32	85.91	9.92	13.50	2.13	0.00	2.75	2.12	2.95	

* Based on 2007 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 (2008).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: INDIANA Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008																	
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:																	
Indianapolis-Carmel	84	28.19	1.40	0.00	11.86	3.57	63.06	91.67	23.69	4.76	11.60	0.00	10.34	13.70	3.13		
Limited Review:																	
Anderson	1	0.34	0.21	0.00	4.22	0.00	51.90	100.00	43.67	0.00	1.89	0.00	0.00	3.03	0.00		
Bloomington	0	0.00	2.25	0.00	5.86	0.00	58.56	0.00	33.33	0.00	0.00	0.00	0.00	0.00	0.00		
Columbus	17	5.70	0.00	0.00	5.78	0.00	84.12	100.00	10.11	0.00	7.25	0.00	0.00	7.69	0.00		
Elkhart-Goshen	3	1.01	0.69	0.00	0.69	0.00	96.53	100.00	2.08	0.00	1.31	0.00	0.00	1.33	0.00		
Fort Wayne	80	26.85	0.30	0.00	6.26	2.50	79.62	97.50	13.81	0.00	8.65	0.00	0.00	9.33	0.00		
Kokomo	7	2.35	0.00	0.00	3.90	0.00	61.19	14.29	34.91	85.71	0.68	0.00	0.00	1.09	0.00		
Michigan City-LaPorte	0	0.00	0.00	0.00	6.19	0.00	84.05	0.00	9.76	0.00	0.00	0.00	0.00	0.00	0.00		
South Bend-Mishawaka	6	2.01	0.20	0.00	7.54	0.00	72.10	50.00	20.16	50.00	1.18	0.00	0.00	1.30	0.00		
Non-Metropolitan AA	92	30.87	0.00	0.00	0.18	0.00	86.45	84.78	13.37	15.22	6.55	0.00	0.00	6.53	7.89		

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: INDIANA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Indianapolis-Carmel	3,108	41.86	19.52	17.99	18.71	29.22	22.99	23.54	38.79	29.25	3.59	5.05	3.77	3.58	3.09	
Limited Review:																
Anderson	285	3.84	18.05	24.37	19.37	31.54	23.21	21.15	39.38	22.94	6.89	9.35	7.32	6.55	5.14	
Bloomington	80	1.08	17.40	10.67	16.89	18.67	21.13	20.00	44.58	50.67	1.96	2.40	1.64	1.51	2.25	
Columbus	103	1.39	17.59	27.08	19.75	35.42	24.22	23.96	38.44	13.54	3.39	7.81	5.05	2.70	1.46	
Elkhart-Goshen	345	4.65	16.23	21.83	19.39	36.87	27.07	20.94	37.31	20.35	4.86	8.06	5.12	4.48	3.62	
Fort Wayne	802	10.80	17.82	25.45	19.25	32.65	24.87	20.95	38.06	20.95	4.34	6.43	4.61	3.30	3.64	
Kokomo	166	2.24	18.98	21.60	18.80	24.69	23.57	22.84	38.64	30.86	4.16	6.46	2.11	3.53	5.63	
Michigan City-LaPorte	170	2.29	17.79	12.57	19.40	23.95	25.27	25.15	37.55	38.32	4.62	3.40	4.14	5.30	4.91	
South Bend-Mishawaka	444	5.98	18.53	16.20	18.63	30.79	23.48	26.39	39.36	26.62	4.19	5.48	3.64	4.64	3.92	
Non-Metropolitan AA	1,070	14.41	13.90	18.70	19.06	29.48	26.76	25.19	40.28	26.62	8.46	13.97	8.76	8.79	6.41	

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 3.0% 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: INDIANA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Indianapolis-Carmel	361	44.19	19.52	18.26	18.71	22.19	22.99	23.60	38.79	35.95	5.74	9.71	5.04	6.50	4.74	
Limited Review:																
Anderson	63	7.71	18.05	11.29	19.37	20.97	23.21	17.74	39.38	50.00	10.12	5.88	6.59	7.69	16.38	
Bloomington	3	0.37	17.40	0.00	16.89	50.00	21.13	50.00	44.58	0.00	0.69	0.00	2.17	1.35	0.00	
Columbus	6	0.73	17.59	0.00	19.75	33.33	24.22	16.67	38.44	50.00	1.55	0.00	1.89	1.11	1.96	
Elkhart-Goshen	23	2.82	16.23	13.04	19.39	34.78	27.07	26.09	37.31	26.09	1.95	2.22	3.57	1.59	1.38	
Fort Wayne	94	11.51	17.82	18.28	19.25	25.81	24.87	22.58	38.06	33.33	4.55	5.33	5.02	4.59	3.89	
Kokomo	22	2.69	18.98	9.09	18.80	31.82	23.57	22.73	38.64	36.36	4.27	8.82	4.76	4.55	1.41	
Michigan City-LaPorte	33	4.04	17.79	21.88	19.40	18.75	25.27	25.00	37.55	34.38	5.19	10.26	5.33	3.81	4.76	
South Bend-Mishawaka	44	5.39	18.53	20.45	18.63	27.27	23.48	27.27	39.36	25.00	2.52	2.27	2.01	2.55	2.94	
Non-Metropolitan AA	108	13.22	13.90	12.96	19.06	28.70	26.76	22.22	40.28	36.11	5.09	5.77	7.27	3.64	4.86	

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: INDIANA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
Full Review:																
Indianapolis-Carmel	2,167	47.01	19.52	11.52	18.71	21.55	22.99	24.86	38.79	42.07	3.42	4.43	3.54	2.92	3.46	
Limited Review:																
Anderson	245	5.31	18.05	13.81	19.37	22.18	23.21	23.01	39.38	41.00	5.80	5.29	5.17	4.65	7.38	
Bloomington	37	0.80	17.40	15.63	16.89	21.88	21.13	12.50	44.58	50.00	0.86	1.82	1.08	0.61	0.78	
Columbus	81	1.76	17.59	20.29	19.75	24.64	24.22	21.74	38.44	33.33	2.32	4.41	2.07	1.45	2.51	
Elkhart-Goshen	140	3.04	16.23	10.08	19.39	25.58	27.07	27.91	37.31	36.43	1.93	1.15	1.79	2.31	1.93	
Fort Wayne	403	8.74	17.82	11.89	19.25	23.51	24.87	26.61	38.06	37.98	3.18	3.11	2.95	3.41	3.21	
Kokomo	119	2.58	18.98	16.96	18.80	25.89	23.57	26.79	38.64	30.36	3.21	5.21	3.88	2.57	2.31	
Michigan City-LaPorte	146	3.17	17.79	11.81	19.40	17.36	25.27	23.61	37.55	47.22	3.20	1.81	2.24	2.92	4.42	
South Bend-Mishawaka	221	4.79	18.53	12.68	18.63	23.94	23.48	24.88	39.36	38.50	2.66	1.70	2.36	2.25	3.37	
Non-Metropolitan AA	625	13.56	13.90	11.31	19.06	24.79	26.76	25.96	40.28	37.94	4.20	5.54	4.17	4.11	4.03	

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 7.7% 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.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: INDIANA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
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:									
Indianapolis-Carmel	2,794	53.91	63.30	59.38	81.71	9.74	8.55	2.79	5.25
Limited Review:									
Anderson	200	3.86	65.52	69.50	92.00	5.50	2.50	4.35	7.05
Bloomington	9	0.17	65.46	55.56	44.44	22.22	33.33	0.10	0.08
Columbus	85	1.64	60.63	67.06	84.71	7.06	8.24	1.63	3.28
Elkhart-Goshen	182	3.51	60.45	52.20	65.93	9.89	24.18	1.64	2.32
Fort Wayne	758	14.62	63.11	55.01	81.66	9.50	8.84	2.66	3.92
Kokomo	62	1.20	63.26	79.03	90.32	8.06	1.61	1.04	2.03
Michigan City-LaPorte	89	1.72	64.64	78.65	91.01	4.49	4.49	1.38	3.06
South Bend-Mishawaka	328	6.33	62.97	67.07	85.06	9.76	5.18	2.27	3.94
Non-Metropolitan AA	511	9.86	62.46	67.51	82.58	8.22	9.20	2.13	3.05

* Based on 2007 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 - 2008).

**** 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 3.09% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: INDIANA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% 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:									
Indianapolis-Carmel	84	28.19	97.48	88.10	65.48	28.57	5.95	11.60	13.10
Limited Review:									
Anderson	1	0.34	98.95	0.00	0.00	100.00	0.00	1.89	0.00
Bloomington	0	0.00	96.85	0.00	0.00	0.00	0.00	0.00	0.00
Columbus	17	5.70	98.92	76.47	76.47	11.76	11.76	7.25	8.20
Elkhart-Goshen	3	1.01	98.44	100.00	100.00	0.00	0.00	1.31	1.55
Fort Wayne	80	26.85	98.49	96.25	72.50	20.00	7.50	8.65	10.30
Kokomo	7	2.35	98.97	100.00	57.14	42.86	0.00	0.68	0.96
Michigan City-LaPorte	0	0.00	98.33	0.00	0.00	0.00	0.00	0.00	0.00
South Bend-Mishawaka	6	2.01	96.74	66.67	0.00	50.00	50.00	1.18	1.34
Non-Metropolitan AA	92	30.87	98.32	86.96	65.22	25.00	9.78	6.55	6.92

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.68% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: INDIANA				Evaluation Period: AUGUST 1, 2006 TO DECEMBER 15, 2008			
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:									
Indianapolis-Carmel	12	10,563	24	8,774	36	19,337	36.01	0	0
Limited Review:									
Anderson	2	2,175	0	0	2	2,175	4.05	0	0
Bloomington	0	0	0	0	0	0	0.00	0	0
Columbus	0	0	0	0	0	0	0.00	0	0
Elkhart-Goshen	3	2,011	1	8	4	2,019	3.76	0	0
Fort Wayne	10	12,076	6	957	16	13,033	24.27	0	0
Kokomo	0	0	0	0	0	0	0.00	0	0
Michigan City-LaPorte	0	0	0	0	0	0	0.00	0	0
South Bend-Mishawaka MSA	0	0	3	5,226	3	5,226	9.73	0	0
Non-Metropolitan AA	6	4,888	2	6,534	8	11,422	21.27	0	0
Statewide – Potential to Benefit One or More AAs	2	482	0	0	2	482	0.90		

* '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: INDIANA Evaluation Period: AUGUST 1, 2006 to DECEMBER 15, 2008																		
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:																		
Indianapolis-Carmel	59.05	71	48.97	2.82	14.08	53.52	29.58	1	0				+1		5.03	24.05	45.22	25.69
Limited Review:																		
Anderson	5.72	10	6.90	0.00	20.00	70.00	10.00	0	0						2.80	16.93	52.62	27.64
Columbus	0.86	2	1.38	0.00	50.00	50.00	0.00	0	0						0.00	16.97	66.59	16.43
Elkhart-Goshen	0.88	4	2.76	25.00	0.00	75.00	0.00	0	0						0.45	6.06	88.14	5.36
Fort Wayne	12.20	19	13.10	5.26	26.32	47.37	21.05	1	1				-1	+1	1.44	23.63	54.92	19.92
Kokomo	2.58	4	2.76	0.00	50.00	50.00	0.00	0	0						0.00	26.19	54.03	19.78
Michigan City-LaPorte	2.34	5	3.45	0.00	40.00	40.00	20.00	0	0						0.00	19.42	66.44	14.14
South Bend-Mishawaka	4.72	9	6.20	0.00	33.33	33.33	33.34	0	1				-1		1.84	24.20	49.83	24.13
Non-Metropolitan AA	11.66	21	14.48	0.00	0.00	85.71	14.79	0	0						0.00	2.04	86.93	11.03

Table 1. Lending Volume

LENDING VOLUME		Geography: KENTUCKY						Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area (2008):	% 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:												
Lexington-Fayette	45.83	1,389	175,910	633	55,134	132	34,564	4	6,212	2,158	271,820	42.17
Limited Review:												
Bowling Green	14.54	484	45,214	194	8,846	5	685	2	546	685	55,291	13.05
Owensboro	13.70	513	49,877	130	12,295	1	120	1	80	645	62,372	11.78
Non-Metropolitan AA	25.93	797	77,457	417	30,952	5	314	2	4,608	1,221	113,331	33.00

* Loan Data as of September 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2008.

*** Deposit Data as of February 08, 2009. 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		Geography: KENTUCKY					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Lexington-Fayette	760	30.45	2.88	2.63	18.17	15.26	43.70	39.48	35.25	42.63	3.62	2.62	3.20	3.90	3.59	
Limited Review:																
Bowling Green	272	10.90	0.00	0.00	9.66	12.87	54.60	52.21	35.74	34.93	6.35	0.00	7.47	6.95	5.20	
Owensboro	324	12.98	0.00	0.00	12.09	13.27	62.07	50.62	25.84	36.11	8.11	0.00	4.78	7.19	11.70	
Non-Metropolitan AA	316	12.66	1.06	0.63	28.84	16.46	34.58	32.59	35.52	50.32	4.56	6.67	5.93	4.41	4.29	

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: KENTUCKY					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Lexington-Fayette	100	28.41	2.88	1.00	18.17	26.00	43.70	36.00	35.25	37.00	4.62	2.56	8.24	3.01	4.66	
Limited Review:																
Bowling Green	41	11.65	0.00	0.00	9.66	9.76	54.60	58.54	35.74	31.71	8.27	0.00	5.26	10.96	5.31	
Owensboro	41	11.65	0.00	0.00	12.09	19.51	62.07	58.54	25.84	21.95	8.04	0.00	12.50	7.78	6.76	
Non-Metropolitan AA	85	24.15	1.06	2.35	28.84	42.35	34.58	24.71	35.52	30.59	7.15	100.00	10.99	5.31	5.97	

* Based on 2007 Peer Mortgage Data (Eastern)

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: KENTUCKY				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008									
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Lexington-Fayette	529	28.02	2.88	2.84	18.17	14.74	43.70	38.19	35.25	44.23	3.08	3.41	2.72	2.85	3.43
Limited Review:															
Bowling Green	171	9.06	0.00	0.00	9.66	9.94	54.60	54.97	35.74	35.09	4.41	0.00	4.49	5.06	3.68
Owensboro	148	7.84	0.00	0.00	12.09	7.43	62.07	62.84	25.84	29.73	4.87	0.00	1.97	5.49	4.75
Non-Metropolitan AA	396	20.97	1.06	0.76	28.84	21.72	34.58	39.90	35.52	37.63	4.64	18.75	6.04	4.86	3.91

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: KENTUCKY				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
Full Review:																
Lexington-Fayette	633	36.48	10.40	12.32	18.57	11.37	37.39	35.23	33.45	41.07	1.77	2.40	1.76	1.78	1.70	
Limited Review:																
Bowling Green	194	11.18	0.00	0.00	22.17	21.65	52.56	54.64	25.27	23.71	3.24	0.00	3.84	3.90	2.24	
Owensboro	130	7.49	0.00	0.00	23.71	28.46	55.53	51.54	20.76	20.00	2.31	0.00	2.90	2.54	1.55	
Non-Metropolitan AA	417	24.03	0.45	0.48	19.05	31.65	39.89	45.08	40.61	22.78	2.55	4.35	5.36	3.42	1.15	

* Based on 2007 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 (2008).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: KENTUCKY Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	Overa ll	Low	Mod	Mid
Full Review:																
Lexington-Fayette	132	92.31	3.71	1.52	11.63	0.76	40.74	40.91	43.91	56.82	13.53	13.33	0.00	13.01	17.05	
Limited Review:																
Bowling Green	5	3.50	0.00	0.00	8.18	0.00	56.97	100.00	34.85	0.00	3.28	0.00	0.00	6.06	0.00	
Owensboro	1	0.70	0.00	0.00	4.16	0.00	76.18	100.00	19.67	0.00	0.00	0.00	0.00	0.00	0.00	
Non-Metropolitan AA	5	3.50	0.00	0.00	11.33	0.00	35.38	60.00	53.29	40.00	0.39	0.00	0.00	1.37	0.00	

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: KENTUCKY					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Lexington-Fayette	760	30.45	20.38	7.75	17.68	23.96	21.65	28.41	40.29	39.88	3.59	2.68	3.56	2.99	4.10	
Limited Review:																
Bowling Green	272	10.90	19.59	15.30	16.71	26.49	20.88	28.36	42.83	29.85	7.06	11.49	9.72	7.06	5.02	
Owensboro	324	12.98	18.70	14.11	17.31	26.33	23.07	27.27	40.92	32.29	8.68	8.56	7.56	7.85	10.09	
Non-Metropolitan AA	316	12.66	23.43	3.59	16.42	15.36	18.17	23.86	41.99	57.19	4.73	5.93	4.69	4.63	4.71	

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 6.9% 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: KENTUCKY								Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					
MA/Assessment Area:	Total Home Improvement 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:															
Lexington-Fayette	100	28.41	20.38	12.00	17.68	17.00	21.65	23.00	40.29	48.00	4.80	7.09	4.49	4.57	4.57
Limited Review:															
Bowling Green	41	11.65	19.59	17.07	16.71	29.27	20.88	24.39	42.83	29.27	8.52	14.29	17.39	5.13	5.93
Owensboro	41	11.65	18.70	17.07	17.31	21.95	23.07	34.15	40.92	26.83	8.42	9.68	9.09	8.82	7.56
Non-Metropolitan AA	85	24.15	23.43	14.12	16.42	23.53	18.17	25.88	41.99	36.47	7.38	13.11	8.04	8.59	5.94

* Based on 2007 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 improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: KENTUCKY					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Lexington-Fayette	529	28.02	20.38	11.02	17.68	16.33	21.65	26.53	40.29	46.12	3.20	2.86	2.57	3.17	3.55	
Limited Review:																
Bowling Green	171	9.06	19.59	11.98	16.71	23.95	20.88	28.14	42.83	35.93	4.90	7.76	7.85	5.24	3.48	
Owensboro	148	7.84	18.70	6.99	17.31	18.88	23.07	31.47	40.92	42.66	5.16	5.49	4.82	4.62	5.60	
Non-Metropolitan AA	396	20.97	23.43	3.13	16.42	10.70	18.17	19.06	41.99	67.10	4.82	6.02	3.11	3.99	5.35	

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 5.8% 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.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: KENTUCKY		Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008			
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:									
Lexington-Fayette	633	36.48	62.62	56.56	80.25	9.79	9.95	1.77	2.67
Limited Review:									
Bowling Green	194	11.18	55.54	69.07	90.21	7.22	2.58	3.24	5.99
Owensboro	130	7.49	54.42	66.92	78.46	11.54	10.00	2.31	4.82
Non-Metropolitan AA	417	24.03	58.11	74.10	84.17	9.83	6.00	2.55	4.42

* Based on 2007 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 - 2008).

**** 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 3.92% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: KENTUCKY			Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% 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:									
Lexington-Fayette	132	92.31	96.16	32.58	23.48	32.58	43.94	13.53	7.32
Limited Review:									
Bowling Green	5	3.50	98.18	80.00	40.00	40.00	20.00	3.28	3.85
Owensboro	1	0.70	98.89	100.00	0.00	100.00	0.00	0.00	0.00
Non-Metropolitan AA	5	3.50	97.09	80.00	80.00	20.00	0.00	0.39	0.43

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 51.75% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: KENTUCKY				Evaluation Period: AUGUST 1, 2006 TO DECEMBER 15, 2008			
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:									
Lexington-Fayette	4	1,239	15	820	19	2,059	14.75	0	0
Limited Review:									
Bowling Green	0	0	3	28	3	28	0.20	0	0
Owensboro	0	0	2	3,546	2	3,546	25.40	0	0
Non-Metropolitan AA	4	2,905	3	5,090	7	7,995	57.26	0	0
Statewide – Potential to Benefit One or More AAs	1	334	0	0	1	334	2.39		

* '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 DELIVER SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: KENTUCKY Evaluation Period: AUGUST 1, 2006 to DECEMBER 15, 2008																	
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:																	
Lexington-Fayette	42.17	20	44.44	10.00	30.00	40.00	20.00	0	0					7.54	21.35	41.66	29.34
Limited Review:																	
Bowling Green	13.05	5	11.11	0.00	40.00	60.00	0.00	0	0					0.00	18.05	54.35	27.60
Owensboro	11.78	4	8.89	0.00	25.00	50.00	25.00	0	0					0.00	16.43	60.78	22.79
Non-Metropolitan AA	33.00	16	35.56	0.00	31.25	31.25	37.50	0	0					2.32	28.15	34.43	35.10

Table 1. Lending Volume

LENDING VOLUME		Geography: MICHIGAN				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008						
MA/Assessment Area (2008):	% 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:												
Warren-Troy-Farmington Hills	29.95	5,723	865,845	3,346	270,793	3	670	2	231	9,074	1,137,539	33.62
Limited Review:												
Ann Arbor	4.72	906	155,825	524	22,992	0	0	1	200	1,431	179,017	6.49
Battle Creek	1.04	238	21,080	77	6,908	1	300	0	0	316	28,288	.76
Bay City	1.51	251	20,739	202	10,281	1	50	2	281	456	31,351	3.01
Detroit-Livonia-Dearborn	18.07	3,759	406,048	1,707	119,108	0	0	8	14,273	5,474	539,429	19.97
Flint	2.47	524	49,365	223	25,337	1	7	1	3,000	749	77,709	.84
Grand Rapids-Wyoming	7.37	1,518	170,340	711	49,921	1	25	7	3,378	2,237	223,664	3.20
Holland-Grand Haven	3.70	817	109,845	302	25,280	1	456	1	100	1,121	135,681	1.35
Jackson	0.97	229	25,251	65	7,589	0	0	0	0	294	32,840	.19
Kalamazoo-Portage	6.35	1,204	144,285	716	47,046	2	800	1	225	1,923	192,356	6.66
Lansing-East Lansing	5.99	1,135	131,255	675	47,014	0	0	5	7,174	1,815	185,443	5.13
Monroe	1.68	381	45,611	126	10,830	1	35	1	236	509	56,712	1.67
Muskegon-Norton Shores	3.40	727	63,264	303	12,722	0	0	1	150	1,031	76,136	2.97
Saginaw-Saginaw Township North	2.00	350	30,473	251	13,599	4	281	1	200	606	44,553	2.49
Non-Metropolitan AA	10.78	2,159	231,747	1,093	68,115	11	1,333	1	14,113	3,264	315,308	11.65

* Loan Data as of September 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2008.

*** Deposit Data as of February 08, 2009. 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		Geography: MICHIGAN					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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:																
Warren-Troy-Farmington Hills	2,669	27.61	0.75	0.45	17.72	14.39	53.08	54.55	28.44	30.61	2.59	0.00	2.28	2.43	3.09	
Limited Review:																
Ann Arbor	458	4.74	2.07	2.84	13.42	13.76	55.60	56.11	28.90	27.29	3.72	7.65	4.52	3.67	3.25	
Battle Creek	118	1.22	1.18	0.00	19.41	20.34	52.71	45.76	26.70	33.90	2.64	0.00	2.48	2.46	3.08	
Bay City	106	1.10	0.00	0.00	15.32	24.53	67.48	63.21	17.20	12.26	2.29	0.00	3.94	1.99	1.50	
Detroit-Livonia-Dearborn	1,926	19.93	3.81	2.70	22.11	14.49	38.26	37.95	35.82	44.86	2.13	2.97	1.05	1.81	2.97	
Flint	237	2.45	7.56	2.95	15.95	11.39	42.80	43.46	33.69	42.19	1.10	1.02	1.14	1.02	1.17	
Grand Rapids-Wyoming	942	9.75	1.08	20.70	12.26	26.75	59.38	33.23	27.29	19.32	3.46	25.65	9.56	2.12	1.92	
Holland-Grand Haven	434	4.49	0.00	0.00	4.67	3.69	91.47	90.55	3.87	5.76	4.79	0.00	2.62	4.87	6.40	
Jackson	100	1.03	0.59	2.00	11.63	15.00	77.08	73.00	10.69	10.00	1.35	0.00	0.48	1.73	0.42	
Kalamazoo-Portage	712	7.37	1.66	0.70	17.36	8.43	54.68	48.60	26.30	42.28	5.86	1.64	3.33	5.67	7.43	
Lansing-East Lansing	554	5.73	1.72	3.61	13.87	24.55	61.20	48.74	23.22	23.10	3.66	3.81	5.63	3.06	3.78	
Monroe	158	1.63	0.58	0.63	1.35	0.63	94.57	93.67	3.51	5.06	2.06	7.14	1.59	2.14	0.00	
Muskegon-Norton Shores	337	3.49	3.33	2.37	15.03	9.79	54.98	53.41	26.66	34.42	4.63	4.67	2.29	4.88	5.50	
Saginaw-Saginaw Township North	152	1.57	8.48	1.97	8.97	6.58	58.66	68.42	23.89	23.03	2.88	1.75	1.81	3.27	2.46	
Non-Metropolitan AA	763	7.89	0.00	0.00	11.83	11.40	67.76	66.58	20.41	22.02	3.52	0.00	3.88	3.75	2.82	

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: MICHIGAN Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008																
MA/Assessment Area:	Total Home Improvement 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	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
Warren-Troy-Farmington Hills	245	19.28	0.75	1.63	17.72	15.92	53.08	55.10	28.44	27.35	2.44	1.79	2.51	2.27	2.78	
Limited Review:																
Ann Arbor	47	3.70	2.07	2.13	13.42	17.02	55.60	63.83	28.90	17.02	3.37	6.25	3.64	3.56	2.65	
Battle Creek	23	1.81	1.18	8.70	19.41	60.87	52.71	21.74	26.70	8.70	1.48	10.00	5.21	0.33	0.75	
Bay City	32	2.52	0.00	0.00	15.32	6.25	67.48	87.50	17.20	6.25	4.38	0.00	2.50	5.45	1.43	
Detroit-Livonia-Dearborn	244	19.20	3.81	1.64	22.11	25.00	38.26	41.80	35.82	31.56	3.80	1.36	4.32	4.48	3.04	
Flint	35	2.75	7.56	0.00	15.95	11.43	42.80	65.71	33.69	22.86	1.48	0.00	1.04	2.09	1.22	
Grand Rapids-Wyoming	70	5.51	1.08	1.43	12.26	8.57	59.38	55.71	27.29	34.29	1.81	3.45	0.89	1.79	2.11	
Holland-Grand Haven	23	1.81	0.00	0.00	4.67	4.35	91.47	86.96	3.87	8.70	1.47	0.00	2.94	1.43	0.00	
Jackson	5	0.39	0.59	0.00	11.63	0.00	77.08	100.00	10.69	0.00	0.28	0.00	0.00	0.36	0.00	
Kalamazoo-Portage	80	6.29	1.66	0.00	17.36	12.50	54.68	52.50	26.30	35.00	4.87	0.00	3.23	4.76	6.84	
Lansing-East Lansing	58	4.56	1.72	1.72	13.87	18.97	61.20	58.62	23.22	20.69	1.81	0.00	3.07	1.78	1.23	
Monroe	33	2.60	0.58	0.00	1.35	3.03	94.57	96.97	3.51	0.00	4.64	0.00	9.09	4.81	0.00	
Muskegon-Norton Shores	71	5.59	3.33	2.82	15.03	21.13	54.98	52.11	26.66	23.94	9.65	5.88	12.86	9.47	8.82	
Saginaw-Saginaw Township North	41	3.23	8.48	12.20	8.97	21.95	58.66	43.90	23.89	21.95	2.71	4.88	10.20	1.58	2.58	
Non-Metropolitan AA	264	20.77	0.00	0.00	11.83	21.97	67.76	70.45	20.41	7.58	5.95	0.00	11.01	5.91	2.47	

* Based on 2007 Peer Mortgage Data (Eastern)

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Warren-Troy-Farmington Hills	2,801	31.21	0.75	0.57	17.72	13.31	53.08	51.87	28.44	34.24	2.17	0.80	1.94	2.14	2.36	
Limited Review:																
Ann Arbor	401	4.47	2.07	2.74	13.42	6.98	55.60	56.36	28.90	33.92	2.85	3.57	1.43	3.04	3.00	
Battle Creek	97	1.08	1.18	0.00	19.41	11.34	52.71	56.70	26.70	31.96	1.69	0.00	0.61	1.86	2.10	
Bay City	113	1.26	0.00	0.00	15.32	19.47	67.48	58.41	17.20	22.12	2.42	0.00	2.73	2.51	1.90	
Detroit-Livonia-Dearborn	1,589	17.70	3.81	1.83	22.11	13.28	38.26	38.70	35.82	46.19	1.67	0.58	0.87	1.73	2.02	
Flint	252	2.81	7.56	3.97	15.95	11.90	42.80	44.44	33.69	39.68	1.20	1.08	0.83	1.36	1.15	
Grand Rapids-Wyoming	506	5.64	1.08	2.77	12.26	7.91	59.38	51.19	27.29	38.14	1.75	2.99	0.80	1.79	2.05	
Holland-Grand Haven	360	4.01	0.00	0.00	4.67	7.50	91.47	85.56	3.87	6.94	2.89	0.00	4.26	2.73	4.35	
Jackson	124	1.38	0.59	2.42	11.63	10.48	77.08	81.45	10.69	5.65	1.13	0.00	0.42	1.27	0.91	
Kalamazoo-Portage	412	4.59	1.66	0.24	17.36	10.68	54.68	54.61	26.30	34.47	3.05	1.72	2.05	3.04	3.76	
Lansing-East Lansing	522	5.82	1.72	1.53	13.87	12.26	61.20	61.69	23.22	24.52	2.27	2.40	1.99	2.44	1.99	
Monroe	190	2.12	0.58	0.00	1.35	1.58	94.57	92.63	3.51	5.79	3.04	0.00	3.85	3.00	4.42	
Muskegon-Norton Shores	319	3.55	3.33	1.57	15.03	7.84	54.98	51.72	26.66	38.87	3.76	3.16	1.90	3.75	4.75	
Saginaw-Saginaw Township North	157	1.75	8.48	1.91	8.97	8.92	58.66	63.69	23.89	25.48	2.05	0.82	3.79	1.72	2.43	
Non-Metropolitan AA	1,132	12.61	0.00	0.00	11.83	13.78	67.76	68.82	20.41	17.40	3.08	0.00	3.91	3.33	2.11	

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MICHIGAN				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
Full Review:																
Warren-Troy-Farmington Hills	3,343	32.52	2.05	2.96	17.96	17.41	50.83	47.50	29.00	32.13	1.53	2.59	1.70	1.52	1.45	
Limited Review:																
Ann Arbor	524	5.10	11.25	8.97	14.14	8.59	51.24	54.96	23.36	27.48	1.99	2.47	1.61	2.09	1.94	
Battle Creek	75	0.73	2.39	4.00	19.57	24.00	51.34	38.67	24.31	33.33	0.72	2.63	1.11	0.40	1.03	
Bay City	202	1.97	0.00	0.00	22.86	19.31	62.26	68.81	14.88	11.88	3.25	0.00	3.28	3.58	2.48	
Detroit-Livonia-Dearborn	1,700	16.54	6.74	3.88	24.86	16.82	34.75	42.47	33.15	36.82	1.68	1.62	1.75	2.04	1.39	
Flint	223	2.17	10.39	9.42	13.40	18.83	47.28	48.43	28.93	23.32	0.69	1.88	1.20	0.66	0.44	
Grand Rapids-Wyoming	711	6.92	2.62	3.38	16.15	17.58	51.94	48.95	29.29	30.10	1.43	2.93	1.83	1.47	1.18	
Holland-Grand Haven	302	2.94	0.00	0.00	8.51	9.27	89.02	85.10	2.47	5.63	1.47	0.00	2.50	1.38	3.56	
Jackson	65	0.63	8.01	12.31	14.18	12.31	70.28	70.77	7.45	4.62	0.98	2.58	1.45	0.88	0.45	
Kalamazoo-Portage	716	6.97	2.65	4.05	23.19	18.99	52.00	54.75	22.16	22.21	3.54	5.82	3.57	3.88	3.01	
Lansing-East Lansing	645	6.27	4.48	3.57	17.95	20.00	51.51	48.99	23.83	27.44	2.50	2.52	3.28	2.30	2.33	
Monroe	126	1.23	0.95	0.79	2.83	0.79	93.89	96.03	2.34	2.38	1.47	4.76	0.00	1.53	0.81	
Muskegon-Norton Shores	303	2.95	4.97	2.97	20.03	23.76	43.38	39.93	31.62	33.33	3.19	1.96	3.76	2.97	3.37	
Saginaw-Saginaw Township North	251	2.44	9.38	5.18	11.24	10.36	55.43	60.16	23.96	24.30	2.42	1.82	3.85	2.70	1.73	
Non-Metropolitan AA	1,093	10.63	0.00	0.00	11.78	14.27	69.11	69.17	19.11	16.56	1.82	0.00	2.53	2.02	1.22	

* Based on 2007 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 (2008).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: MICHIGAN				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
Full Review:																
Warren-Troy-Farmington Hills	3	11.54	1.22	0.00	16.52	0.00	59.84	66.67	22.42	33.33	0.68	0.00	0.00	0.62	1.27	
Limited Review:																
Ann Arbor	0	0.00	2.39	0.00	6.84	0.00	60.55	0.00	30.22	0.00	0.00	0.00	0.00	0.00	0.00	
Battle Creek	1	3.85	0.95	0.00	5.21	0.00	81.28	100.00	12.32	0.00	1.96	0.00	0.00	2.44	0.00	
Bay City	1	3.85	0.00	0.00	5.39	0.00	72.06	100.00	22.55	0.00	2.56	0.00	0.00	3.33	0.00	
Detroit-Livonia-Dearborn	0	0.00	3.67	0.00	18.54	0.00	39.42	0.00	38.14	0.00	0.00	0.00	0.00	0.00	0.00	
Flint	1	3.85	3.86	0.00	6.55	0.00	43.63	100.00	45.96	0.00	2.22	0.00	0.00	4.35	0.00	
Grand Rapids-Wyoming	1	3.85	0.22	0.00	4.56	0.00	63.50	100.00	31.71	0.00	0.77	0.00	0.00	1.33	0.00	
Holland-Grand Haven	1	3.85	0.00	0.00	1.75	0.00	97.25	100.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	
Jackson	0	0.00	1.12	0.00	3.36	0.00	90.58	0.00	4.93	0.00	0.00	0.00	0.00	0.00	0.00	
Kalamazoo-Portage	2	7.69	0.41	0.00	21.49	0.00	56.71	100.00	21.38	0.00	0.00	0.00	0.00	0.00	0.00	
Lansing-East Lansing	0	0.00	0.58	0.00	6.14	0.00	77.81	0.00	15.41	0.00	0.00	0.00	0.00	0.00	0.00	
Monroe	1	3.85	0.00	0.00	0.19	0.00	97.04	100.00	2.78	0.00	0.00	0.00	0.00	0.00	0.00	
Muskegon-Norton Shores	0	0.00	1.39	0.00	6.97	0.00	70.73	0.00	20.91	0.00	0.00	0.00	0.00	0.00	0.00	
Saginaw-Saginaw Township North	4	15.38	2.26	0.00	2.26	0.00	71.64	100.00	23.83	0.00	3.92	0.00	0.00	5.88	0.00	
Non-Metropolitan AA	11	42.31	0.00	0.00	5.35	0.00	73.78	90.91	20.87	9.09	1.16	0.00	0.00	1.37	0.88	

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MICHIGAN					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008								
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	Lo w	Mod	Mi d	Up p
Full Review:															
Warren-Troy-Farmington Hills	2,677	27.67	17.83	16.27	18.34	29.17	23.84	23.83	39.99	30.73	2.81	2.86	2.50	2.64	3.19
Limited Review:															
Ann Arbor	458	4.73	19.62	11.40	18.04	29.27	22.71	20.47	39.63	38.86	3.31	4.43	3.64	2.36	3.47
Battle Creek	118	1.22	19.31	18.26	18.76	26.96	22.55	20.00	39.38	34.78	2.93	3.23	2.64	2.44	3.35
Bay City	106	1.10	18.81	18.00	19.72	33.00	21.93	26.00	39.53	23.00	2.56	3.57	2.71	2.50	1.91
Detroit-Livonia-Dearborn	1,926	19.91	23.09	6.51	16.60	23.01	19.31	30.81	41.01	39.67	2.48	2.39	2.24	2.16	2.84
Flint	237	2.45	22.10	12.04	17.07	28.24	20.46	28.70	40.37	31.02	1.15	1.20	0.95	1.53	0.97
Grand Rapids-Wyoming	942	9.74	17.31	6.77	18.46	28.63	24.33	28.52	39.90	36.07	3.86	1.53	3.91	4.23	4.24
Holland-Grand Haven	434	4.49	14.28	15.74	19.85	33.66	29.77	22.52	36.09	28.09	5.34	5.49	5.35	4.77	5.73
Jackson	100	1.03	17.84	9.57	19.18	29.79	24.66	28.72	38.32	31.91	1.35	0.71	0.62	1.38	2.45
Kalamazoo-Portage	712	7.36	19.20	9.92	18.77	29.77	23.27	27.44	38.75	32.87	6.51	5.32	7.14	7.22	5.96
Lansing-East Lansing	555	5.74	18.99	17.07	18.70	28.20	23.64	28.01	38.67	26.72	4.42	6.05	3.91	4.77	3.94
Monroe	158	1.63	17.78	5.92	19.03	28.29	25.15	34.21	38.05	31.58	2.19	0.74	2.27	2.46	2.48
Muskegon-Norton Shores	337	3.48	19.62	13.76	18.74	25.38	22.87	27.52	38.77	33.33	5.41	4.35	4.09	5.98	6.79
Saginaw-Saginaw Township North	152	1.57	21.61	11.49	17.36	36.49	20.27	18.24	40.76	33.78	3.31	3.35	4.52	2.05	3.31
Non-Metropolitan AA	763	7.89	16.68	8.32	18.89	25.92	23.20	26.60	41.23	39.15	3.97	3.37	4.84	4.18	3.56

* Based on 2007 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MICHIGAN					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Warren-Troy-Farmington Hills	245	19.28	17.83	16.46	18.34	23.87	23.84	21.40	39.99	38.27	2.51	2.73	2.42	1.47	3.27	
Limited Review:																
Ann Arbor	47	3.70	19.62	17.39	18.04	19.57	22.71	32.61	39.63	30.43	3.34	3.49	1.71	3.86	3.86	
Battle Creek	23	1.81	19.31	47.83	18.76	39.13	22.55	4.35	39.38	8.70	1.49	6.25	3.25	0.00	0.00	
Bay City	32	2.52	18.81	15.63	19.72	18.75	21.93	25.00	39.53	40.63	4.51	2.41	2.78	4.72	6.76	
Detroit-Livonia-Dearborn	244	19.20	23.09	22.22	16.60	23.87	19.31	23.05	41.01	30.86	3.89	7.91	4.02	3.67	2.95	
Flint	35	2.75	22.10	8.82	17.07	35.29	20.46	29.41	40.37	26.47	1.45	1.15	1.63	1.69	1.20	
Grand Rapids-Wyoming	70	5.51	17.31	14.49	18.46	17.39	24.33	21.74	39.90	46.38	1.80	2.25	1.89	1.36	1.96	
Holland-Grand Haven	23	1.81	14.28	17.39	19.85	21.74	29.77	34.78	36.09	26.09	1.49	2.25	1.79	1.46	0.97	
Jackson	5	0.39	17.84	20.00	19.18	0.00	24.66	20.00	38.32	60.00	0.29	0.00	0.00	0.51	0.46	
Kalamazoo-Portage	80	6.29	19.20	16.25	18.77	28.75	23.27	16.25	38.75	38.75	5.05	7.02	6.37	4.38	4.15	
Lansing-East Lansing	58	4.56	18.99	13.79	18.70	17.24	23.64	25.86	38.67	43.10	1.85	1.96	1.58	1.62	2.22	
Monroe	33	2.60	17.78	9.09	19.03	21.21	25.15	21.21	38.05	48.48	4.73	3.64	4.62	3.01	6.78	
Muskegon-Norton Shores	71	5.59	19.62	18.31	18.74	29.58	22.87	16.90	38.77	35.21	9.98	10.81	10.83	7.56	10.76	
Saginaw-Saginaw Township North	41	3.23	21.61	19.51	17.36	24.39	20.27	31.71	40.76	24.39	2.79	2.94	1.80	5.39	1.44	
Non-Metropolitan AA	264	20.77	16.68	11.74	18.89	28.79	23.20	26.89	41.23	32.58	6.15	4.76	8.88	6.19	5.02	

* Based on 2007 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 improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: MICHIGAN				Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008							
MA/Assessment Area:	Total Home Mortgage Refinance 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:															
Warren-Troy-Farmington Hills	2,801	31.21	17.83	9.05	18.34	23.52	23.84	26.48	39.99	40.95	2.35	2.01	2.25	2.25	2.56
Limited Review:															
Ann Arbor	401	4.47	19.62	7.65	18.04	19.88	22.71	22.63	39.63	49.85	2.50	2.29	2.46	2.33	2.67
Battle Creek	97	1.08	19.31	14.89	18.76	15.96	22.55	26.60	39.38	42.55	1.90	2.98	1.33	1.10	2.56
Bay City	113	1.26	18.81	14.15	19.72	21.70	21.93	33.02	39.53	31.13	2.62	3.81	2.49	2.46	2.40
Detroit-Livonia-Dearborn	1,589	17.70	23.09	8.50	16.60	18.40	19.31	26.40	41.01	46.70	1.78	2.02	1.59	1.70	1.87
Flint	252	2.81	22.10	7.05	17.07	26.43	20.46	25.11	40.37	41.41	1.27	1.23	1.32	0.94	1.49
Grand Rapids-Wyoming	506	5.64	17.31	5.58	18.46	20.39	24.33	25.32	39.90	48.71	1.94	1.19	1.63	1.74	2.43
Holland-Grand Haven	360	4.01	14.28	10.09	19.85	23.24	29.77	26.91	36.09	39.76	3.20	3.51	2.63	2.78	4.04
Jackson	124	1.38	17.84	10.38	19.18	26.42	24.66	26.42	38.32	36.79	0.94	0.00	1.13	0.97	1.10
Kalamazoo-Portage	412	4.59	19.20	10.24	18.77	21.00	23.27	24.15	38.75	44.62	3.32	3.52	2.56	3.52	3.56
Lansing-East Lansing	522	5.82	18.99	9.17	18.70	19.58	23.64	27.08	38.67	44.17	2.58	2.42	1.91	2.48	3.19
Monroe	190	2.12	17.78	10.53	19.03	23.39	25.15	30.41	38.05	35.67	3.02	4.74	2.69	2.41	3.43
Muskegon-Norton Shores	319	3.55	19.62	12.04	18.74	21.74	22.87	29.77	38.77	36.45	4.05	5.15	3.19	4.63	3.82
Saginaw-Saginaw Township North	157	1.75	21.61	10.42	17.36	27.78	20.27	19.44	40.76	42.36	2.23	1.75	2.56	1.98	2.37
Non-Metropolitan AA	1,132	12.61	16.68	8.25	18.89	17.79	23.20	25.58	41.23	48.38	3.45	4.35	3.35	3.49	3.36

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 8.6% 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.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MICHIGAN			Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
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:									
Warren-Troy-Farmington Hills	3,346	32.42	68.32	66.05	85.42	6.49	8.10	1.53	3.06
Limited Review:									
Ann Arbor	524	5.08	68.52	69.47	92.94	4.01	3.05	1.99	3.88
Battle Creek	77	0.75	65.08	67.53	77.92	11.69	10.39	0.72	1.41
Bay City	202	1.96	64.51	64.36	87.62	10.40	1.98	3.25	4.68
Detroit-Livonia-Dearborn	1,707	16.54	67.77	70.18	86.82	7.32	5.86	1.68	3.54
Flint	223	2.16	67.37	61.43	72.20	14.35	13.45	0.69	1.15
Grand Rapids-Wyoming	711	6.89	66.04	65.68	86.22	7.45	6.33	1.43	2.47
Holland-Grand Haven	302	2.93	68.86	66.56	81.13	10.60	8.28	1.47	2.38
Jackson	65	0.63	64.69	66.15	83.08	4.62	12.31	0.98	1.98
Kalamazoo-Portage	716	6.94	66.53	59.78	85.61	8.24	6.15	3.54	5.21
Lansing-East Lansing	675	6.54	65.04	62.07	85.63	7.85	6.52	2.50	4.06
Monroe	126	1.22	64.51	67.46	82.54	7.94	9.52	1.47	2.08
Muskegon-Norton Shores	303	2.94	68.31	72.94	90.76	7.59	1.65	3.19	5.24
Saginaw-Saginaw Township North	251	2.43	62.83	62.95	89.24	7.17	3.59	2.42	4.41
Non-Metropolitan AA	1,093	10.59	65.43	70.81	88.84	5.58	5.58	1.82	3.04

* Based on 2007 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 - 2008).

**** 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 1.82% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: MICHIGAN		Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% 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:									
Warren-Troy-Farmington Hills	3	11.54	96.44	66.67	33.33	33.33	33.33	0.68	0.85
Limited Review:									
Ann Arbor	0	0.00	97.61	0.00	0.00	0.00	0.00	0.00	0.00
Battle Creek	1	3.85	97.63	100.00	0.00	0.00	100.00	1.96	2.56
Bay City	1	3.85	99.02	100.00	100.00	0.00	0.00	2.56	3.13
Detroit-Livonia-Dearborn	0	0.00	97.05	0.00	0.00	0.00	0.00	0.00	0.00
Flint	1	3.85	98.13	0.00	100.00	0.00	0.00	2.22	0.00
Grand Rapids-Wyoming	1	3.85	95.81	100.00	100.00	0.00	0.00	0.77	1.14
Holland-Grand Haven	1	3.85	94.50	0.00	0.00	0.00	100.00	0.00	0.00
Jackson	0	0.00	98.43	0.00	0.00	0.00	0.00	0.00	0.00
Kalamazoo-Portage	2	7.69	94.73	0.00	0.00	0.00	100.00	0.00	0.00
Lansing-East Lansing	0	0.00	96.99	0.00	0.00	0.00	0.00	0.00	0.00
Monroe	1	3.85	96.30	100.00	100.00	0.00	0.00	0.00	0.00
Muskegon-Norton Shores	0	0.00	95.82	0.00	0.00	0.00	0.00	0.00	0.00
Saginaw-Saginaw Township North	4	15.38	97.89	100.00	75.00	25.00	0.00	3.92	5.00
Non-Metropolitan AA	11	42.31	97.90	90.91	63.64	18.18	18.18	1.16	1.49

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 7.69% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MICHIGAN				Evaluation Period: AUGUST 1, 2006 TO DECEMBER 15, 2008			
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:									
Warren-Troy-Farmington Hills	1	118	11	4,286	12	4,404	5.77	0	0
Limited Review:									
Ann Arbor	0	0	4	34	4	34	0.05	0	0
Battle Creek	1	2,454	0	0	1	2,454	3.22	0	0
Bay City	0	0	0	0	0	0	0.00	0	0
Detroit-Livonia-Dearborn	20	24,599	39	12,851	59	37,450	49.07	0	0
Flint	1	444	0	0	1	444	0.58	0	0
Grand Rapids-Wyoming	4	3,279	7	3,886	11	7,165	9.39	0	0
Holland-Grand Haven	0	0	3	27	3	27	0.04	0	0
Jackson	0	0		0	0	0	0.00	0	0
Kalamazoo-Portage	1	565	7	577	8	1,142	1.50	0	0
Lansing-East Lansing	2	813	3	36	5	849	1.11	0	0
Monroe	0	0	0	0	0	0	0.00	0	0
Muskegon-Norton Shores	0	0	2	46	2	46	0.06	0	0
Saginaw-Saginaw Township North	1	686	0	0	1	686	0.90	0	0
Non-Metropolitan AA	3	2,318	3	3,760	6	6,078	7.96	0	0
Statewide – Potential to Benefit One or More AAs	11	15,530	0	0	11	15,530	20.35	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: AUGUST 1, 2006 to DECEMBER 15, 2008																		
MA/Assessment Area:	Deposits % of Rated Area Deposits in AA	Branches						Branch Openings/Closings						Population				
		# 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:																		
Warren-Troy-Farmington Hills	33.62	68	27.64	2.94	19.12	55.88	22.06	3	3			-1	+1		1.66	19.35	52.07	26.91
Limited Review:																		
Ann Arbor	6.49	13	5.28	7.69	15.38	61.55	15.38	0	0						11.48	18.11	48.69	21.72
Battle Creek	0.76	3	1.22	0.00	0.00	66.77	0.00	0	0						1.99	23.53	51.25	23.21
Bay City	3.01	6	2.44	0.00	50.00	50.00	0.00	0	0						0.00	19.55	65.06	15.39
Detroit-Livonia-Dearborn	19.97	39	15.85	2.56	15.38	33.33	48.73	2	2			+1	-2	+1	7.80	30.49	33.77	27.85
Flint	0.84	3	1.22	0.00	0.00	100.0	0.00	0	0						12.32	17.84	40.48	29.36
Grand Rapids-Wyoming	3.20	15	6.10	0.00	13.33	60.00	26.67	0	0						2.36	17.03	56.73	23.88
Holland-Grand Haven	1.35	6	2.44	0.00	16.67	83.33	0.00	1	0				+1		0.00	5.86	90.83	3.31
Jackson	0.19	2	.81	50.00	0.00	50.00	0.00	0	0						2.43	14.06	72.73	8.89
Kalamazoo-Portage	6.66	18	7.32	11.11	27.78	44.44	16.67	0	0						5.92	21.21	51.05	21.82
Lansing-East Lansing	5.13	15	6.10	0.00	13.33	53.33	26.67	0	0						5.69	16.98	55.47	21.05
Monroe	1.67	3	1.22	0.00	0.00	100.0	0.00	0	0						1.03	2.15	93.50	3.33
Muskegon-Norton Shores	2.97	9	3.66	0.00	11.11	55.56	33.33	0	0						5.82	21.98	48.81	23.40
Saginaw-Saginaw North Township	2.49	9	3.66	0.00	22.22	44.44	33.34	0	0						12.52	11.50	53.37	22.61
Non-Metropolitan AA	11.65	37	15.04	0.00	27.03	59.46	13.51	1	0				+1		0.00	11.93	68.18	19.89

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008						
MA/Assessment Area (2005):	% 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:												
Cleveland-Elyria-Mentor	21.94	13,957	1,659,880	9,883	946,242	13	1,806	24	61,142	23,877	2,669,070	64.64
Limited Review:												
Akron MSA	7.54	4,840	522,063	3,364	311,674	1	56	4	6,895	8,209	840,688	4.75
Canton-Massillon	4.06	3,124	294,476	1,277	104,353	15	1,678	2	1,000	4,418	401,507	1.38
Cincinnati-Middletown	7.99	6,579	788,736	2,114	254,523	1	183	0	0	8,694	1,043,442	0.00
Columbus	18.96	14,408	1,824,979	6,196	546,711	13	2,869	13	77,549	20,630	2,452,108	9.51
Dayton	13.78	11,409	1,192,141	3,568	356,687	6	716	15	30,155	14,998	1,579,699	6.17
Huntington-Ashland	0.36	338	21,737	53	2,736	2	12	0	0	393	24,485	0.00
Mansfield	0.58	416	36,969	190	24,566	20	3,301	0	0	626	64,836	0.12
Sandusky	0.92	625	66,481	372	27,746	6	834	0	0	1,003	95,061	0.48
Springfield	2.20	1,819	158,224	576	46,275	3	661	0	0	2,398	205,160	0.94
Toledo	5.79	4,402	488,411	1,880	190,207	8	872	5	380	6,295	679,870	2.72
Weirton-Steubenville	0.56	383	28,581	219	14,105	3	219	0	0	605	42,905	0.70
Wheeling	0.58	486	41,034	147	8,076	2	179	0	0	635	49,289	0.33
Youngstown-Warren-Boardman	2.06	1,401	114,953	841	67,831	0	0	0	0	2,242	182,784	0.00
Non-Metropolitan AA	12.68	9,201	784,931	4,275	342,929	321	40,268	1	275	13,798	1,168,403	8.26

* Loan Data as of September 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2008.

*** Deposit Data as of March 09, 2009. 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			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Cleveland-Elyria-Mentor	7,045	19.26	4.83	6.13	12.41	8.97	48.22	47.69	34.54	37.21	4.80	9.19	4.22	4.23	5.24	
Limited Review:																
Akron	2,615	7.15	2.76	4.47	18.38	17.86	51.56	49.02	27.30	28.64	4.02	5.45	3.12	3.87	4.52	
Canton-Massillon	1,816	4.96	0.92	0.28	14.69	15.20	65.16	66.46	19.23	18.06	5.14	2.78	5.21	5.29	4.78	
Cincinnati-Middletown	3,718	60.32	2.51	2.77	14.73	16.62	49.30	48.95	33.46	31.66	5.27	6.78	6.18	5.58	4.44	
Columbus	8,236	22.52	2.94	2.55	17.51	16.19	45.74	43.92	33.81	37.35	4.76	2.95	5.67	4.68	4.69	
Dayton	7,065	19.31	2.03	1.34	18.03	11.65	48.40	49.61	31.54	37.40	11.30	14.74	8.01	12.16	11.36	
Huntington-Ashland	169	2.74	0.00	0.00	5.05	3.55	94.95	96.45	0.00	0.00	13.90	0.00	20.93	13.52	0.00	
Mansfield	247	0.68	0.16	0.00	14.17	10.53	58.08	67.21	27.58	22.27	1.75	0.00	0.00	2.04	1.86	
Sandusky	328	0.90	0.00	0.00	18.57	14.02	65.56	68.29	15.87	17.68	5.77	0.00	1.71	6.87	6.98	
Springfield	953	2.61	1.73	0.84	9.72	7.03	59.32	66.95	29.23	25.18	8.61	0.00	4.60	9.94	6.95	
Toledo	2,433	6.65	2.74	0.90	13.99	11.18	56.25	50.43	27.01	37.48	6.04	3.65	4.85	5.43	7.60	
Weirton-Steubenville	186	0.51	0.92	0.00	8.50	5.38	87.23	90.32	3.35	4.30	7.41	0.00	10.53	6.85	11.43	
Wheeling	283	0.77	0.00	0.00	10.33	5.30	83.93	83.75	5.74	10.95	8.56	0.00	3.90	9.25	7.45	
Youngstown-Warren-Boardman	780	12.65	2.74	0.64	12.34	10.38	60.78	63.08	24.14	25.90	6.44	6.56	6.93	6.87	5.40	
Non-Metropolitan AA	4,845	13.25	0.06	0.00	11.64	11.31	75.99	76.18	12.31	12.51	6.44	0.00	6.01	6.37	7.18	

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Elyria-Mentor	1,399	35.16	4.83	6.79	12.41	14.37	48.22	49.18	34.54	29.66	7.85	6.52	10.61	7.27	7.89	
Limited Review:																
Akron	215	5.40	2.76	1.86	18.38	14.88	51.56	56.74	27.30	26.51	3.76	0.00	2.11	4.19	4.45	
Canton-Massillon	115	2.89	0.92	0.00	14.69	7.83	65.16	69.57	19.23	22.61	3.49	0.00	0.57	3.99	4.30	
Cincinnati-Middletown	247	50.61	2.51	3.64	14.73	13.36	49.30	50.20	33.46	32.79	3.97	3.94	4.28	3.73	4.17	
Columbus	652	16.39	2.94	5.06	17.51	21.17	45.74	46.17	33.81	27.61	4.94	7.09	5.86	4.77	4.47	
Dayton	400	10.05	2.03	2.75	18.03	20.75	48.40	48.00	31.54	28.50	7.01	5.88	9.22	7.05	5.71	
Huntington-Ashland	46	9.43	0.00	0.00	5.05	4.35	94.95	95.65	0.00	0.00	13.53	0.00	15.00	13.41	0.00	
Mansfield	12	0.30	0.16	0.00	14.17	25.00	58.08	50.00	27.58	25.00	0.46	0.00	0.00	0.38	1.01	
Sandusky	35	0.88	0.00	0.00	18.57	28.57	65.56	57.14	15.87	14.29	5.19	0.00	1.82	5.93	7.32	
Springfield	104	2.61	1.73	3.85	9.72	12.50	59.32	55.77	29.23	27.88	10.74	20.00	6.67	10.83	11.67	
Toledo	214	5.38	2.74	3.27	13.99	14.95	56.25	58.41	27.01	23.36	4.21	6.38	3.70	4.96	2.77	
Weirton-Steubenville	41	1.03	0.92	0.00	8.50	7.32	87.23	87.80	3.35	4.88	4.29	0.00	3.23	4.56	0.00	
Wheeling	44	1.11	0.00	0.00	10.33	13.64	83.93	81.82	5.74	4.55	4.50	0.00	6.56	4.42	0.00	
Youngstown-Warren-Boardman	90	18.44	2.74	5.56	12.34	14.44	60.78	66.67	24.14	13.33	3.70	15.38	3.87	3.84	2.50	
Non-Metropolitan AA	673	16.91	0.06	0.00	11.64	22.73	75.99	70.13	12.31	7.13	5.45	0.00	8.95	5.34	2.61	

* Based on 2007 Peer Mortgage Data (Eastern)

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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:																
Cleveland-Elyria-Mentor	5,509	21.67	4.83	2.41	12.41	8.82	48.22	47.99	34.54	40.77	4.44	2.95	3.53	4.09	5.38	
Limited Review:																
Akron	2,010	7.91	2.76	2.59	18.38	14.53	51.56	50.80	27.30	32.09	4.30	2.49	2.55	4.42	5.20	
Canton-Massillon	1,193	4.69	0.92	0.84	14.69	13.16	65.16	65.55	19.23	20.45	4.21	0.00	3.17	4.42	4.35	
Cincinnati-Middletown	2,614	60.83	2.51	3.18	14.73	16.76	49.30	47.40	33.46	32.67	3.95	3.41	4.14	3.86	4.04	
Columbus	5,520	21.72	2.94	3.17	17.51	15.94	45.74	43.10	33.81	37.79	4.23	3.75	3.98	4.08	4.56	
Dayton	3,944	15.52	2.03	1.45	18.03	14.48	48.40	47.74	31.54	36.33	7.21	2.54	5.94	7.33	7.92	
Huntington-Ashland	123	2.86	0.00	0.00	5.05	4.88	94.95	95.12	0.00	0.00	8.56	0.00	4.26	8.76	0.00	
Mansfield	157	0.62	0.16	0.00	14.17	15.92	58.08	64.97	27.58	19.11	1.58	0.00	0.55	1.89	1.35	
Sandusky	262	1.03	0.00	0.00	18.57	21.76	65.56	61.07	15.87	17.18	4.18	0.00	4.35	3.59	6.06	
Springfield	762	3.00	1.73	1.05	9.72	8.14	59.32	58.27	29.23	32.55	8.53	4.65	5.83	9.13	8.57	
Toledo	1,755	6.90	2.74	1.25	13.99	10.26	56.25	53.28	27.01	35.21	4.24	5.00	2.69	4.09	5.10	
Weirton-Steubenville	156	0.61	0.92	0.00	8.50	7.69	87.23	88.46	3.35	3.85	4.17	0.00	8.93	3.73	6.45	
Wheeling	159	0.63	0.00	0.00	10.33	6.92	83.93	81.13	5.74	11.95	3.67	0.00	3.61	3.58	4.92	
Youngstown-Warren-Boardman	531	12.36	2.74	1.13	12.34	12.05	60.78	64.97	24.14	21.85	3.79	4.67	4.38	4.09	2.84	
Non-Metropolitan AA	3,683	14.49	0.06	0.11	11.64	11.02	75.99	76.32	12.31	12.54	4.89	28.57	4.49	4.74	6.06	

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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:																
Cleveland-Elyria-Mentor	2	100.0 0	12.81	50.00	25.25	50.00	44.29	0.00	17.66	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
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	
Canton-Massillon	0	0.00	6.01	0.00	15.88	0.00	49.84	0.00	28.27	0.00	0.00	0.00	0.00	0.00	0.00	
Cincinnati-Middletown	0	0.00	18.89	0.00	24.17	0.00	40.01	0.00	16.93	0.00	0.00	0.00	0.00	0.00	0.00	
Columbus	0	0.00	12.21	0.00	31.62	0.00	35.18	0.00	20.99	0.00	0.00	0.00	0.00	0.00	0.00	
Dayton	0	0.00	8.65	0.00	21.65	0.00	48.43	0.00	21.28	0.00	0.00	0.00	0.00	0.00	0.00	
Huntington-Ashland	0	0.00	0.00	0.00	25.55	0.00	74.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Mansfield	0	0.00	1.06	0.00	25.75	0.00	53.27	0.00	19.92	0.00	0.00	0.00	0.00	0.00	0.00	
Sandusky	0	0.00	0.00	0.00	31.32	0.00	48.15	0.00	20.53	0.00	0.00	0.00	0.00	0.00	0.00	
Springfield	0	0.00	4.16	0.00	21.72	0.00	70.62	0.00	3.49	0.00	0.00	0.00	0.00	0.00	0.00	
ToledoA	0	0.00	7.15	0.00	21.51	0.00	54.06	0.00	17.28	0.00	0.00	0.00	0.00	0.00	0.00	
Weirton-Steubenville	0	0.00	1.32	0.00	49.89	0.00	41.78	0.00	7.01	0.00	0.00	0.00	0.00	0.00	0.00	
Wheeling	0	0.00	0.00	0.00	30.15	0.00	55.40	0.00	14.45	0.00	0.00	0.00	0.00	0.00	0.00	
Youngstown-Warren-Boardman	0	0.00	7.90	0.00	14.86	0.00	59.75	0.00	17.50	0.00	0.00	0.00	0.00	0.00	0.00	
Non-Metropolitan AA	0	0.00	1.96	0.00	19.19	0.00	68.79	0.00	10.07	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2007 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.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
Full Review:																
Cleveland-Elyria-Mentor	9,801	30.43	8.44	6.40	14.97	12.63	40.43	38.48	35.46	42.50	3.18	4.40	3.52	3.04	3.15	
Limited Review:																
Akron	3,364	10.45	9.50	9.04	14.54	10.91	43.26	41.35	32.70	38.70	3.37	4.37	3.12	3.16	3.69	
Canton-Massillon	1,277	3.97	3.80	2.58	15.07	11.82	57.29	57.48	23.84	28.11	2.24	0.62	1.94	2.24	2.66	
Cincinnati-Middletown	2,099	44.61	6.27	6.57	17.65	15.20	45.03	40.50	29.92	37.73	2.82	4.01	3.02	2.58	2.94	
Columbus	6,196	19.24	7.45	6.79	18.95	16.45	40.02	38.96	33.58	37.80	2.44	3.93	2.67	2.66	2.08	
Dayton	3,567	11.08	6.71	8.97	20.33	20.35	42.88	34.51	30.08	36.16	3.46	7.80	4.67	2.91	3.25	
Huntington-Ashland	53	1.13	0.00	0.00	14.37	13.21	85.63	86.79	0.00	0.00	5.08	0.00	12.35	4.66	0.00	
Mansfield	190	0.59	3.72	3.68	20.08	12.63	51.58	53.16	24.63	30.53	1.05	0.00	0.66	1.41	0.94	
Sandusky	372	1.16	0.00	0.00	24.29	17.47	60.37	67.47	15.34	15.05	2.87	0.00	2.08	3.21	2.93	
Springfield	576	1.79	2.77	1.91	17.92	16.15	54.79	55.90	24.52	26.04	3.99	3.95	3.49	4.62	3.42	
Toledo	1,880	5.84	4.71	2.93	12.25	12.61	54.04	52.87	29.00	31.60	2.25	2.71	3.17	2.33	1.99	
Weirton-Steubenville	219	0.68	1.64	0.46	19.21	18.72	73.44	69.41	5.71	11.42	3.55	0.00	3.37	3.32	9.68	
Wheeling	147	0.46	0.00	0.00	17.28	35.37	71.90	48.98	10.83	15.65	1.67	0.00	2.10	1.28	4.52	
Youngstown-Warren-Boardman	817	17.36	4.96	5.26	14.76	12.48	51.57	53.86	28.46	28.40	3.74	3.18	4.61	4.03	2.76	
Non-Metropolitan AA	4,275	13.27	0.72	0.54	13.21	8.73	75.53	78.41	10.54	12.33	2.89	3.61	2.61	3.00	3.32	

* Based on 2007 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 (2008).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
Full Review:																
Cleveland-Elyria-Mentor	13	3.10	2.76	7.69	6.91	0.00	50.42	69.23	39.78	23.08	0.78	0.00	0.00	0.85	0.88	
Limited Review:																
Akron	1	0.24	2.82	0.00	8.19	0.00	57.04	100.00	31.95	0.00	0.00	0.00	0.00	0.00	0.00	
Canton-Massillon	15	3.58	1.02	0.00	8.32	0.00	73.71	100.00	16.95	0.00	4.08	0.00	0.00	4.82	0.00	
Cincinnati-Middletown	1	33.33	1.69	0.00	12.41	0.00	54.97	100.00	30.92	0.00	0.00	0.00	0.00	0.00	0.00	
Columbus	13	3.10	1.35	0.00	10.06	7.69	61.37	84.62	27.22	7.69	0.38	0.00	0.00	0.52	0.00	
Dayton	6	1.43	1.06	0.00	10.74	16.67	63.87	83.33	24.33	0.00	1.06	0.00	7.69	0.85	0.00	
Huntington-Ashland	2	66.67	0.00	0.00	5.41	0.00	94.59	100.00	0.00	0.00	12.50	0.00	0.00	14.29	0.00	
Mansfield	20	4.77	0.29	0.00	4.02	0.00	70.40	90.00	25.29	10.00	16.67	0.00	0.00	19.57	7.14	
Sandusky	6	1.43	0.00	0.00	6.48	0.00	80.09	83.33	13.43	16.67	4.55	0.00	0.00	0.00	25.00	
Springfield	3	0.72	0.81	0.00	4.59	0.00	48.92	66.67	45.68	33.33	0.00	0.00	0.00	0.00	0.00	
Toledo	8	1.91	1.00	0.00	4.45	0.00	72.08	100.00	22.46	0.00	0.36	0.00	0.00	0.41	0.00	
Weirton-Steubenville	3	0.72	0.86	0.00	1.72	0.00	97.41	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Wheeling	2	0.48	0.00	0.00	1.88	0.00	92.50	100.00	5.63	0.00	4.35	0.00	0.00	4.35	0.00	
Youngstown-Warren-Boardman	0	0.00	0.97	0.00	4.37	0.00	70.63	0.00	24.03	0.00	0.00	0.00	0.00	0.00	0.00	
Non-Metropolitan AA	321	76.61	0.04	0.00	4.29	1.25	77.95	78.19	17.71	20.56	4.40	0.00	2.94	4.36	5.30	

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008					Market Share*				
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:																
Cleveland-Elyria-Mentor	7,047	19.26	20.34	9.01	18.08	26.20	22.21	27.08	39.37	37.71	4.94	4.60	4.04	5.00	5.50	
Limited Review:																
Akron	2,615	7.15	19.24	15.49	18.62	30.50	23.21	24.16	38.93	29.85	4.22	5.74	4.62	3.93	3.81	
Canton-Massillon	1,816	4.96	17.81	15.32	19.41	31.02	24.06	27.14	38.73	26.52	5.70	8.38	5.56	5.67	5.19	
Cincinnati-Middletown	3,718	60.32	18.96	15.15	18.09	31.08	22.51	26.43	40.43	27.34	6.37	8.08	8.58	6.33	4.80	
Columbus	8,236	22.52	19.39	10.81	18.38	29.44	23.09	26.74	39.13	33.01	5.28	5.57	5.16	5.35	5.24	
Dayton	7,065	19.31	19.26	11.87	18.66	28.51	22.62	28.20	39.46	31.41	12.17	14.47	13.83	12.80	10.15	
Huntington-Ashland	169	2.74	23.36	12.20	18.32	32.32	22.74	27.44	35.58	28.05	15.49	25.81	21.34	13.82	11.44	
Mansfield	247	0.68	17.95	16.18	19.32	29.46	23.37	29.05	39.36	25.31	1.94	1.19	2.34	1.88	1.96	
Sandusky	328	0.90	19.00	6.92	18.59	24.21	23.34	31.45	39.07	37.42	6.25	2.38	5.00	8.92	5.93	
Springfield	953	2.61	18.75	13.51	18.55	31.03	24.25	29.08	38.44	26.38	9.58	5.75	10.22	11.41	9.02	
Toledo	2,433	6.65	20.18	11.40	18.07	24.70	22.67	27.38	39.08	36.52	6.47	4.15	5.86	6.96	7.31	
Weirton-Steubenville	186	0.51	20.15	11.41	19.32	28.80	22.60	32.07	37.94	27.72	8.59	6.67	11.24	8.38	7.32	
Wheeling	283	0.77	20.21	9.56	19.48	18.01	22.89	27.21	37.41	45.22	9.10	3.75	9.79	8.54	10.58	
Youngstown-Warren-Boardman	780	12.65	18.59	16.03	18.34	33.38	22.23	26.09	40.83	24.50	7.31	9.00	8.23	7.75	5.52	
Non-Metropolitan AA	4,845	13.24	17.90	11.70	19.58	29.43	24.43	29.93	38.09	28.94	7.26	6.38	7.45	7.99	6.79	

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 4.6% 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families*	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families*	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Elyria-Mentor	1,399	35.16	20.34	13.12	18.08	22.21	22.21	27.32	39.37	37.35	7.93	8.07	8.84	7.91	7.39	
Limited Review:																
Akron	215	5.40	19.24	10.70	18.62	23.72	23.21	26.51	38.93	39.07	3.82	1.94	3.93	4.03	4.19	
Canton-Massillon	115	2.89	17.81	10.43	19.41	21.74	24.06	24.35	38.73	43.48	3.53	2.34	2.19	3.35	4.95	
Cincinnati-Middletown	247	50.61	18.96	15.16	18.09	25.00	22.51	22.54	40.43	37.30	4.07	3.05	4.95	3.70	4.07	
Columbus	652	16.39	19.39	16.85	18.38	23.49	23.09	23.80	39.13	35.86	5.04	6.84	5.88	4.93	4.19	
Dayton	400	10.05	19.26	14.25	18.66	20.10	22.62	29.01	39.46	36.64	6.87	8.52	6.54	7.25	6.31	
Huntington-Ashland	46	9.43	23.36	8.70	18.32	28.26	22.74	32.61	35.58	30.43	13.69	12.50	16.36	14.29	11.96	
Mansfield	12	0.30	17.95	16.67	19.32	25.00	23.37	16.67	39.36	41.67	0.47	0.00	0.00	0.00	1.28	
Sandusky	35	0.88	19.00	25.71	18.59	17.14	23.34	17.14	39.07	40.00	5.38	8.70	1.69	5.36	7.06	
Springfield	104	2.61	18.75	15.38	18.55	16.35	24.25	24.04	38.44	44.23	10.96	12.28	5.32	13.27	12.07	
Toledo	214	5.38	20.18	13.74	18.07	19.43	22.67	29.38	39.08	37.44	4.27	4.62	3.81	4.52	4.28	
Weirton-Steubenville	41	1.03	20.15	12.20	19.32	24.39	22.60	19.51	37.94	43.90	4.36	5.56	4.65	3.67	4.40	
Wheeling	44	1.11	20.21	18.18	19.48	18.18	22.89	27.27	37.41	36.36	4.65	9.68	3.09	4.72	3.47	
Youngstown-Warren-Boardman	90	18.44	18.59	22.22	18.34	23.33	22.23	18.89	40.83	35.56	3.79	7.33	3.30	3.08	3.21	
Non-Metropolitan AA	673	16.91	17.90	12.69	19.58	21.49	24.43	29.85	38.09	35.97	5.52	8.19	4.90	6.18	4.78	

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: OHIO				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008							
MA/Assessment Area:	Total Home Mortgage Refinance 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:															
Cleveland-Elyria-Mentor	5,509	21.67	20.34	10.21	18.08	20.27	22.21	27.82	39.37	41.70	4.59	4.54	3.77	4.46	5.11
Limited Review:															
Akron	2,010	7.91	19.24	10.88	18.62	20.49	23.21	25.07	38.93	43.56	4.48	3.62	4.08	4.09	5.16
Canton-Massillon	1,193	4.69	17.81	10.38	19.41	20.40	24.06	28.41	38.73	40.81	4.42	3.66	3.75	4.73	4.75
Cincinnati-Middletown	2,614	60.83	18.96	14.16	18.09	25.61	22.51	26.68	40.43	33.56	4.73	5.91	4.84	4.58	4.50
Columbus	5,520	21.72	19.39	11.17	18.38	22.92	23.09	24.38	39.13	41.53	4.51	5.40	4.12	4.16	4.74
Dayton	3,944	15.52	19.26	10.42	18.66	22.34	22.62	26.71	39.46	40.53	7.39	8.04	7.09	6.89	7.75
Huntington-Ashland	123	2.86	23.36	7.44	18.32	18.18	22.74	35.54	35.58	38.84	9.29	12.62	10.34	7.69	9.02
Mansfield	157	0.62	17.95	9.93	19.32	25.83	23.37	23.18	39.36	41.06	1.76	1.14	1.34	1.92	2.04
Sandusky	262	1.03	19.00	10.80	18.59	23.60	23.34	26.00	39.07	39.60	4.32	6.00	2.92	4.18	4.89
Springfield	762	3.00	18.75	13.50	18.55	21.35	24.25	30.44	38.44	34.71	9.23	12.85	9.22	9.11	8.55
Toledo	1,755	6.90	20.18	9.78	18.07	20.91	22.67	27.30	39.08	42.00	4.57	4.37	3.83	4.28	5.21
Weirton-Steubenville	156	0.61	20.15	8.44	19.32	23.38	22.60	27.92	37.94	40.26	4.25	3.90	5.14	3.33	4.33
Wheeling	159	0.63	20.21	13.38	19.48	10.19	22.89	26.11	37.41	50.32	4.18	6.93	0.00	4.52	4.89
Youngstown-Warren-Boardman	531	12.36	18.59	13.20	18.34	26.41	22.23	26.02	40.83	34.37	4.37	6.14	4.05	4.81	3.74
Non-Metropolitan AA	3,683	14.49	17.90	10.47	19.58	21.30	24.43	29.56	38.09	38.68	5.20	5.99	4.74	5.11	5.35

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 5.7% 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.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO			Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008				
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:									
Cleveland-Elyria-Mentor	9,883	30.61	66.13	59.65	79.61	10.28	10.11	3.18	5.51
Limited Review:									
Akron	3,364	10.42	65.80	56.45	78.48	12.31	9.22	3.37	5.34
Canton-Massillon	1,277	3.96	65.45	61.94	81.05	11.04	7.91	2.24	4.22
Cincinnati-Middletown	2,114	44.56	62.66	64.00	74.88	9.32	15.80	2.82	5.01
Columbus	6,196	19.19	62.53	58.01	80.15	10.04	9.81	2.44	4.10
Dayton	3,567	11.05	62.21	51.14	76.70	12.14	11.16	3.46	4.70
Huntington-Ashland	53	1.12	61.03	79.25	92.45	5.66	1.89	5.08	9.95
Mansfield	190	0.59	64.02	48.42	74.21	11.58	14.21	1.05	1.44
Sandusky	372	1.15	64.76	67.20	81.18	12.63	6.18	2.87	5.08
Springfield	576	1.78	59.76	63.89	79.86	13.89	6.25	3.99	6.14
Toledo	1,880	5.82	63.61	55.80	78.46	9.89	11.65	2.25	2.93
Weirton-Steubenville	219	0.68	65.57	76.26	84.93	10.96	4.11	3.55	7.11
Wheeling	147	0.46	61.93	61.90	87.07	10.20	2.72	1.67	2.91
Youngstown-Warren-Boardman	841	17.73	63.30	57.91	79.43	12.13	8.44	3.74	5.98
Non-Metropolitan AA	4,275	13.24	59.54	64.05	82.97	9.66	7.37	2.89	4.78

* Based on 2007 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 - 2008).

**** 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 6.01% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: OHIO		Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% 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:									
Cleveland-Elyria-Mentor	13	3.10	96.69	84.62	38.46	46.15	15.38	0.78	0.96
Limited Review:									
Akron	1	0.24	97.01	100.00	100.00	0.00	0.00	0.00	0.00
Canton-Massillon	15	3.58	97.87	86.67	80.00	6.67	13.33	4.08	5.06
Cincinnati-Middletown	1	33.33	92.12	100.00	0.00	100.00	0.00	0.00	0.00
Columbus	13	3.10	96.54	61.54	23.08	38.46	38.46	0.38	0.24
Dayton	6	1.43	97.58	100.00	50.00	50.00	0.00	1.06	1.19
Huntington-Ashland	2	66.67	97.30	0.00	100.00	0.00	0.00	12.50	0.00
Mansfield	20	4.77	98.56	60.00	40.00	45.00	15.00	16.67	16.98
Sandusky	6	1.43	96.76	83.33	66.67	16.67	16.67	4.55	0.00
Springfield	3	0.72	97.03	66.67	33.33	33.33	33.33	0.00	0.00
Toledo	8	1.91	97.11	100.00	62.50	37.50	0.00	0.36	0.39
Weirton-Steubenville	3	0.72	98.28	66.67	66.67	33.33	0.00	0.00	0.00
Wheeling	2	0.48	98.75	100.00	50.00	50.00	0.00	4.35	5.00
Youngstown-Warren-Boardman	0	0.00	94.78	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metropolitan AA	321	76.61	98.72	88.79	56.70	30.84	12.46	4.40	4.62

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 4.77% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO		Evaluation Period: JANUARY 1, 2005 TO DECEMBER 15, 2008					
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:									
Cleveland-Elyria-Mentor	14	12,003	63	43,844	77	55,847	28.76	0	0
Limited Review:									
Akron	2	790	4	13	6	803	0.41	0	0
Canton-Massillon	1	40	0	0	1	40	0.02	0	0
Cincinnati-Middletown	0	0	3	5,551	3	5,551	2.86	0	0
Columbus	5	3,474	47	18,128	52	21,602	11.12	0	0
Dayton	0	0	20	4,796	20	4,796	2.47	0	0
Huntington-Ashland	0	0	0	0	0	0	0.00	0	0
Mansfield	0	0	0	0	0	0	0.00	0	0
Sandusky	0	0	0	0	0	0	0.00	0	0
Springfield	0	0	1	5	1	5	0.00	0	0
Toledo	0	0	24	24,236	24	24,236	12.48	0	0
Weirton-Steubenville	1	877	0	0	1	877	0.45	0	0
Wheeling	0	0	0	0	0	0	0.00	0	0
Youngstown-Warren-Boardman	0	0	0	0	0	0	0.00	0	0
Non-Metropolitan AA	3	1,430	3	2,133	6	3,563	1.84	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 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO		Evaluation Period: JANUARY 1, 2005 TO DECEMBER 15, 2008					
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Limited Review:									
Regional Investments– Potential to Benefit One or More AAs	1	923	6	67	7	990	0.51	0	0
Statewide – Potential to Benefit One or More AAs	12	10,069	4	65,835	16	75,904	39.08	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: OHIO Evaluation Period: JANUARY 1, 2005 to DECEMBER 15, 2008																	
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:																	
Cleveland-Elyria-Mentor	64.64	79	25.24	2.53	20.25	43.04	34.18	2	4			-1	-1	9.74	16.77	43.79	29.67
Limited Review:																	
Akron	4.75	26	8.30	11.54	15.38	34.62	38.46	2	3			-3	+2	6.29	21.45	48.11	24.15
Canton-Massillon	1.38	13	4.15	7.69	7.69	53.85	30.77	0	0					1.88	17.09	62.40	18.63
Columbus	9.51	63	20.13	6.35	25.40	31.75	36.50	8	0			+4	+4	6.60	22.56	42.13	28.47
Dayton	6.17	31	9.90	3.23	19.35	41.94	35.48	1	0			+1		3.49	22.91	46.40	27.20
Mansfield	0.12	1	.32	0.00	0.00	100.0	0.00	0	0					2.08	17.95	56.06	23.91
Sandusky	0.48	3	.96	0.00	33.33	66.67	0.00	0	0					0.00	24.16	61.49	14.35
Springfield	0.94	6	1.92	0.00	33.33	66.67	0.00	0	0					3.37	15.18	57.07	24.38
Toledo	2.72	21	6.71	4.76	14.29	47.62	33.33	0	1				-1	6.14	17.69	52.10	24.07
Weirton-Steubenville	0.70	4	1.28	0.00	50.00	50.00	0.00	0	0					1.78	12.77	82.17	3.27
Wheeling	0.33	3	.96	0.00	33.33	33.33	33.34	0	0					0.00	12.84	81.63	5.53
Non-Metropolitan AA	8.26	63	20.13	1.59	17.46	76.19	4.76	0	1			-1		0.19	12.70	75.73	11.38

Table 1. Lending Volume

LENDING VOLUME		Geography: PENNSYLVANIA						Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area (2008):	% 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:												
Pittsburgh	73.33	10,370	961,780	6,195	458,834	1	252	6	7,810	16,572	1,428,676	83.48
Limited Review:												
Erie	6.26	685	63,272	727	58,031	3	86	3	140	1,418	121,529	3.49
Philadelphia	7.21	1,620	201,713	8	507	0	0	0	0	1,628	202,220	13.03
Non-Metropolitan AA	13.20	1,919	136,803	1,058	73,677	6	1,002	0	0	2,983	211,482	0.00

* Loan Data as of September 30, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2008.

*** Deposit Data as of February 08, 2009. 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		Geography: PENNSYLVANIA						Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008							
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:															
Pittsburgh	4,332	66.72	1.23	0.69	17.74	17.31	54.91	49.91	26.11	32.09	5.36	6.92	7.00	5.08	5.19
Limited Review:															
Erie	334	5.14	1.45	1.50	10.88	9.58	59.21	53.89	28.47	35.03	5.11	7.50	3.70	4.83	5.90
Philadelphia	1,008	15.52	23.30	15.97	43.70	44.54	28.82	31.65	4.18	7.84	1.45	1.05	1.29	1.80	1.99
Non-Metropolitan AA	819	12.61	0.35	0.12	4.78	1.83	86.67	86.45	8.20	11.60	7.29	11.11	0.87	7.67	7.83

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: PENNSYLVANIA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Pittsburgh	1,317	76.53	1.23	0.76	17.74	21.26	54.91	56.04	26.11	21.94	7.06	3.54	8.02	7.14	6.36	
Limited Review:																
Erie	77	4.47	1.45	0.00	10.88	22.08	59.21	48.05	28.47	29.87	2.71	0.00	5.49	2.17	2.97	
Philadelphia	30	1.74	23.30	20.00	43.70	36.67	28.82	30.00	4.18	13.33	0.22	0.25	0.18	0.16	1.11	
Non-Metropolitan AA	297	17.26	0.35	0.34	4.78	3.03	86.67	91.58	8.20	5.05	6.02	12.50	4.44	6.25	4.22	

* Based on 2007 Peer Mortgage Data (Eastern)

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA						Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008						
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Pittsburgh	4,720	73.99	1.23	0.59	17.74	14.43	54.91	55.36	26.11	29.62	7.42	5.24	7.01	7.46	7.60
Limited Review:															
Erie	274	4.30	1.45	1.82	10.88	10.58	59.21	51.46	28.47	36.13	4.43	12.20	6.33	3.51	5.19
Philadelphia	582	9.12	23.30	14.78	43.70	40.55	28.82	39.18	4.18	5.50	0.90	0.74	0.80	1.09	1.37
Non-Metropolitan AA	803	12.59	0.35	0.37	4.78	1.99	86.67	85.31	8.20	12.33	6.15	16.67	3.13	5.97	9.20

* Based on 2007 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.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: PENNSYLVANIA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Pittsburgh	1	100.00	10.57	0.00	23.83	100.00	38.98	0.00	26.62	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Erie	0	0.00	15.44	0.00	21.13	0.00	36.83	0.00	26.60	0.00	0.00	0.00	0.00	0.00	0.00	
Philadelphia	0	0.00	16.24	0.00	32.56	0.00	34.03	0.00	17.17	0.00	0.00	0.00	0.00	0.00	0.00	
Non-Metropolitan AA	0	0.00	3.79	0.00	15.66	0.00	71.58	0.00	8.97	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2007 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.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: PENNSYLVANIA Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008															
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 Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Pittsburgh	6,185	77.53	3.78	2.81	18.56	16.72	45.81	48.02	31.73	32.45	3.83	3.35	4.19	4.21	3.42
Limited Review:															
Erie	727	9.11	6.97	2.89	16.25	14.44	55.05	62.45	21.72	20.22	4.29	2.59	4.32	5.00	3.39
Philadelphia	8	0.10	25.16	0.00	37.06	50.00	23.47	0.00	12.12	50.00	0.01	0.00	0.02	0.00	0.04
Non-Metropolitan AA	1,058	13.26	1.33	0.76	9.13	8.03	81.77	80.81	7.77	10.40	3.17	2.02	3.52	3.29	3.31

* Based on 2007 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 (2008).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: PENNSYLVANIA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	Overa ll	Low	Mod	Mid	Upp				
Full Review:																					
Pittsburgh	1	10.00	0.76	0.00	12.54	0.00	64.08	100.00	22.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
Limited Review:																					
Erie	3	30.00	1.52	0.00	4.75	0.00	74.90	100.00	18.82	0.00	3.51	0.00	0.00	4.00	0.00						
Philadelphia	0	0.00	15.08	0.00	37.99	0.00	32.12	0.00	14.53	0.00	0.00	0.00	0.00	0.00	0.00						
Non-Metropolitan AA	6	60.00	0.07	0.00	2.56	0.00	91.78	100.00	5.59	0.00	1.12	0.00	0.00	1.27	0.00						

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: PENNSYLVANIA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:																	
Pittsburgh	4,332	66.72	19.53	11.61	18.74	25.64	22.04	25.22	39.70	37.53	5.59	7.33	6.12	5.45	5.17		
Limited Review:																	
Erie	334	5.14	18.52	12.11	18.90	27.95	23.47	22.67	39.12	37.27	5.26	4.73	5.47	4.65	5.63		
Philadelphia	1,008	15.52	38.71	19.21	21.29	27.54	18.78	26.32	21.23	26.93	1.58	1.60	1.33	1.73	1.67		
Non-Metropolitan AA	819	12.61	19.10	12.61	20.28	28.34	24.06	25.09	36.57	33.96	7.67	6.94	8.37	7.33	7.64		

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 2.4% 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: PENNSYLVANIA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Pittsburgh	1,317	76.53	19.53	13.62	18.74	22.45	22.04	26.56	39.70	37.37	7.15	6.35	6.62	7.57	7.43	
Limited Review:																
Erie	77	4.47	18.52	16.88	18.90	12.99	23.47	27.27	39.12	42.86	2.73	2.96	1.99	2.40	3.29	
Philadelphia	30	1.74	38.71	13.79	21.29	13.79	18.78	27.59	21.23	44.83	0.21	0.06	0.09	0.16	0.56	
Non-Metropolitan AA	297	17.26	19.10	8.08	20.28	26.94	24.06	28.62	36.57	36.36	6.09	4.06	6.98	5.12	6.80	

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.2% of loans originated and purchased by bank.

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: PENNSYLVANIA Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008															
MA/Assessment Area:	Total Home Mortgage Refinance 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:															
Pittsburgh	4,720	73.99	19.53	10.26	18.74	19.53	22.04	25.56	39.70	44.65	7.87	8.49	7.30	6.98	8.58
Limited Review:															
Erie	274	4.30	18.52	8.65	18.90	12.78	23.47	26.69	39.12	51.88	4.64	4.17	4.02	4.29	5.31
Philadelphia	582	9.12	38.71	17.85	21.29	27.18	18.78	27.18	21.23	27.79	0.80	0.74	0.72	0.88	0.85
Non-Metropolitan AA	803	12.59	19.10	12.40	20.28	20.33	24.06	29.16	36.57	38.11	6.40	7.67	5.72	6.09	6.69

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 3.3% 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.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PENNSYLVANIA			Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
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:									
Pittsburgh	6,195	77.55	65.90	68.97	84.04	10.41	5.55	3.83	6.77
Limited Review:									
Erie	727	9.10	64.62	67.26	82.94	10.45	6.60	4.29	6.55
Philadelphia	8	0.10	62.42	37.50	87.50	12.50	0.00	0.01	0.02
Non-Metropolitan AA	1,058	13.24	63.46	64.65	82.33	11.72	5.95	3.17	4.65

* Based on 2007 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 - 2008).

**** 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 2.85% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: PENNSYLVANIA					Evaluation Period: AUGUST 1, 2006 TO SEPTEMBER 30, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% 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:									
Pittsburgh	1	10.00	97.14	100.00	0.00	0.00	100.00	0.00	0.00
Limited Review:									
Erie	3	30.00	99.05	100.00	100.00	0.00	0.00	3.51	4.26
Philadelphia	0	0.00	95.25	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metropolitan AA	6	60.00	98.76	100.00	33.33	50.00	16.67	1.12	1.37

* Based on 2007 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: PENNSYLVANIA			Evaluation Period: AUGUST 1, 2006 TO DECEMBER 15, 2008						
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:									
Pittsburgh	11	8,980	40	1,851	51	10,831	88.39	0	0
Limited Review:									
Erie	0	0	6	43	6	43	0.35	0	0
Philadelphia	0	0	0	0	0	0	0.00	0	0
Non-Metropolitan AA	2	528	10	852	12	1,380	11.26	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: PENNSYLVANIA Evaluation Period: AUGUST 1, 2006 to DECEMBER 15, 2008																	
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:																	
Pittsburgh	83.48	138	76.67	3.62	21.01	47.83	27.54	1	5	-1	-1	-2		2.88	20.42	51.63	25.06
Limited Review:																	
Erie	3.49	11	6.11	18.18	18.18	45.46	18.18	0	0					4.40	16.81	53.86	24.93
Philadelphia	0.00	1	.55	100.0	0.00	0.00	0.00	0	0					28.91	41.93	24.90	4.08
Non-Metropolitan AA	13.03	30	16.67	3.33	10.00	76.67	10.00	0	0					0.69	6.10	85.07	8.14