



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

The Huntington National Bank
Charter Number: 7745

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Office of the Comptroller of the Currency

Large Bank Supervision
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NOTE: 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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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **The Huntington National Bank** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of March 31, 2003. The agency evaluates performance in assessment areas, as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

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

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

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Limited-Scope 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, branch distribution).

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

Institution's **CRA Rating**: This institution is rated **Satisfactory**.

The following table indicates the performance level of **The Huntington National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Huntington National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
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:

- The Huntington National Bank's (HNB) volume of home mortgage loans and small loans to business is good.
- The bank's geographic distribution of loans is adequate.
- HNB's distribution of loans to borrowers of different income levels is good.
- The bank originated a high volume of community development loans.
- HNB's level of qualified investments benefiting its assessment areas is good.
- Service delivery systems were accessible to geographies and individuals of different income levels in the assessment areas.
- HNB provided a relatively high level of community development services.

Description of Institution

HNB is a full-service financial institution headquartered in Columbus, Ohio. It is a wholly owned subsidiary of Huntington Bancshares Incorporated (HBI). The bank offers a full range of consumer and commercial banking products and services within its assessment areas including

mortgage banking services, automobile financing, equipment leasing, investment management, trust services, discount brokerage services, underwriting credit life and disability insurance, and selling other insurance and financial products and services. HNB offers agricultural loans based upon local needs, but it is not a focus for the bank.

For purposes of the CRA evaluation, HNB is an interstate bank operating 373 offices in Ohio, Michigan, Indiana, West Virginia, Florida and both the Ohio and Kentucky portions of the Cincinnati Multi-state Metropolitan Area (MMSA). Refer to the "Multi-State Metropolitan Area and State Ratings" section of this evaluation for details on the locations of HNB's offices.

The Huntington Community Development Corporation (HCDC) is a subsidiary of HBI. We considered the investments made by HCDC when evaluating the bank's performance under the Investment Test. The Huntington Mortgage Company was a bank subsidiary until January 1, 2003 when it was integrated into the bank as part of the Regional Banking line of business. We considered the residential mortgage loans made by the company/line of business when evaluating the bank's performance under the Lending Test. Refer to the "Scope of the Evaluation" section for more information.

HNB operates three major business lines: Regional Banking; Dealer Sales; and the Private Financial Group.

Regional Banking provides products and services to retail, business banking, and commercial customers. This segment's products include home equity loans, first mortgage loans, direct installment loans, business loans, personal and business deposit products, as well as sales of investment and insurance services. These products and services are offered in six operating regions within the five states of Ohio, Michigan, Indiana, West Virginia, and Kentucky through Huntington's traditional banking network, Direct Bank (HNB's customer service center), and Web Bank at www.huntington.com. Regional Banking also represents middle-market and large commercial banking relationships which use a variety of banking products and services including, but not limited to, commercial loans, international trade, and cash management.

Dealer Sales serves automotive dealerships within Huntington's primary banking markets, as well as in Arizona, Florida, Georgia, Pennsylvania, and Tennessee. This business line finances the purchase of automobiles by customers of the automotive dealerships, purchases automobiles from dealers and simultaneously leases the automobile under long-term operating and direct financing leases, finances the dealerships' inventory of automobiles, and provides other banking services to the automotive dealerships and their owners.

The Private Financial Group (PFG) provides products and services designed to meet the needs of HNB's higher wealth customers. PFG offers personal trust, asset management, investment advisory, brokerage, insurance, and deposit and loan products and services to its clients.

As of December 31, 2002, HNB had \$27.399 billion in total assets and Tier One Capital of \$1.45 billion and HBI had total assets of \$27.432 billion. HNB's loan-to-deposit ratio on that date was 100 percent and net loans represented 66 percent of total assets. By dollar amount, the loan portfolio consisted of the following types of credit: 37.11 percent commercial (including

commercial real estate); 28.84 percent residential real estate; 19.03 percent consumer; 7.16 percent construction real estate; 5.64 percent lease financing receivables; 0.64 percent agricultural (including agricultural real estate); and 1.57 percent other loans.

HNB sold its Florida banking operations to SunTrust Banks, Inc., as part of a strategic refocusing plan. The sale closed on February 15, 2002 and included 143 banking offices and 456 ATMs, with approximately \$2.8 billion in loans and other tangible assets. The sales agreement included a non-competition clause. The clause limits HNB to offering deposit and trust products and services to its PFG clients and originating residential mortgage loans and indirect auto dealer loans. Refer to the section entitled "Scope of Evaluation in Florida" for additional information on the restrictions contained in the sales contract and our evaluation of the bank's performance in Florida. There are no other known legal, financial, or other impediments that would hamper HNB's ability to help meet the credit needs of its assessment areas. There were no merger or acquisition activities during the evaluation period. The bank previously received a "Satisfactory" rating at the last CRA examination dated June 30, 1999.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test in this examination covers the period of January 1, 1999 to December 31, 2002. The evaluation period for the service and investment tests and community development lending in this examination covers the period from July 1, 1999 to December 31, 2002. We evaluated the bank's residential real estate lending reported for the Home Mortgage Disclosure Act (HMDA) and the small loans to businesses and farms reported for the Community Reinvestment Act (CRA) in our assessment of the bank's performance under the lending test. We did not evaluate lending for multifamily housing because it is not a focus of the bank and the number of multifamily housing loans is too small for meaningful analysis. We also evaluated the bank's community development loans. We evaluated HNB's community development investments and donations in our assessment of its performance under the investment test. We also evaluated the community development investments made by HCDC. We evaluated the retail services offered by HNB, the location of its branches and other offices, its record of opening and closing offices and community development services provided by bank employees and officers in our evaluation of HNB's performance under the service test.

Data Integrity

We tested the accuracy of HMDA and CRA data reported by the bank during the evaluation period. The data tested included residential real estate loans, small loans to businesses and farms. We also reviewed community development loans, investments and services reported by the bank to ensure they met the regulatory definition of community development. We identified a limited number of exceptions and concluded the information reported by the bank is accurate and reliable for our evaluation of the bank's CRA performance.

Selection of Areas for Full-Scope Review

We selected assessment areas (AAs) for full-scope reviews in each state where HNB has banking offices. The AAs selected for full-scope reviews represent areas in which HNB has a significant presence represented by the number of banking offices within the area and the volume of deposits. Refer to the “Scope” section under each state rating for details regarding how the areas were selected. The Cincinnati Multi-state Metropolitan Statistical Area (MMSA) is the only multi-state metropolitan area in which HNB has banking offices in more than one state.

Ratings

HNB's overall rating is a blend of the Cincinnati MMSA rating and state ratings.

The ratings for the States of Michigan, Ohio and West Virginia and the Cincinnati MMSA are weighted most heavily in determining the overall rating for HNB. The bank has its largest operational presence in these states and the MMSA (branches and loan and deposit volume). This is also consistent with the strategic plans of bank management to emphasize operations and seek growth opportunities within the midwestern region of the country.

HNB's rating for the State of Indiana is given less weight because the bank has a significantly smaller presence in the state. The bank has branches in the greater Indianapolis area and the Lafayette/West Lafayette area. Its deposits represent less than one percent of the deposits in all of the chartered financial institutions in Indiana and less than 3.3 percent of HNB's total deposits. The bank does not have a physical presence in the majority of the state.

HNB's rating for the State of Florida is given the least weight because the bank only maintains PFG offices in two areas of the state. The bank's CRA performance is evaluated in the state because these offices are licensed as full service branches although limited services are offered to private banking (high income/net worth) clients. As discussed in the institution description, HNB sold its retail operations in 2002 and agreed to a non-competition clause in the sales agreement. We evaluated the bank's performance in the two areas with offices remaining because those are the only areas with actual performance data for the entire evaluation period. We are evaluating its performance in those areas within the context of the restrictions established by the non-competition clause and the bank's operational strategy.

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

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

Cincinnati Multi-state MMSA Rating

CRA Rating for Cincinnati MMSA, including Ohio and Kentucky: Satisfactory 2

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- HNB originated a good volume of home mortgage loans and small loans to businesses.
- The distribution of loans by borrower income is good, but the geographic distribution of loans is poor.
- The bank provided a high volume of community development loans.
- HNB's level of qualified investments is excellent.
- Service delivery systems were accessible to geographies and individuals of different income levels throughout the Cincinnati MMSA AA.
- HNB provided a high level of community development services.

Description of HNB's Operations in the Cincinnati Multi-state Metropolitan Area

HNB's AA in the Cincinnati Multi-state Metropolitan Area (MMSA) consists of Hamilton County, Ohio and Boone, Campbell and Kenton Counties in Kentucky and 15 tracts in Clermont County, Ohio. HNB has 30 office locations and 76 automated teller machines (ATMs) in the Cincinnati MMSA. HNB reported \$833 million in deposits in the Cincinnati MMSA as of June 30, 2002. This represents 5 percent of the bank's total deposit base. According to FDIC deposit market share information as of that date, HNB is the sixth largest bank in the MMSA with a deposit market share of 2.86 percent. HNB originated 6.62 percent of its reportable loans during the evaluation period in the Cincinnati AA.

HNB offers a full range of banking products and services throughout the Cincinnati AA.

Refer to the market profile for the Cincinnati MMSA in Appendix C for detailed demographics, information from community contacts, and other performance context information.

² 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.

Scope of Evaluation in the Cincinnati Multi-state Metropolitan Area

We performed a full-scope review of the bank's performance in the Cincinnati AA. With the exception of small farm lending, we assigned equal weight to all reported loan products. Small farm lending is not a significant product for the bank and is not actively promoted. An analysis of small farm lending was not included in our analysis due to the very low volume.

LENDING TEST

The bank's performance under the Lending Test in the Cincinnati Multi-state Metropolitan Statistical Area (MMSA) is rated "High Satisfactory."

Lending Activity

Refer to Table 1 Lending Volume in the "Multi-state Metropolitan Area" section of appendix D for the facts and data used to evaluate the bank's lending activity.

The overall volume of lending in Cincinnati is good. This conclusion results from a good volume of home mortgage and small business lending and an excellent volume of community development lending.

The bank's overall volume of home mortgage lending is good. The bank had a good volume of home purchase and refinance lending. Their market performance when compared with financial institutions with a physical presence in the Cincinnati AA was slightly lower than their deposit performance. The bank had an excellent volume of home improvement lending with the market rank and market share percentage exceeding their deposit market rank and market share.

Small business lending volume is good. The market rank for small business lending was slightly lower than the deposit market rank when the out of market credit card banks are removed. The bank made only three small farm loans. This product is not a focus for the bank and is therefore not included in our analysis.

Distribution of Loans by Income Level of the Geography

The overall distribution of loans by income level of geography is adequate in the Cincinnati AA. Home mortgage loans reflect adequate overall geographic distribution and small loans to businesses reflect good distribution.

The reader should note that in developing our conclusions more consideration was given to the percentage distribution of loans than to market share data. The emphasis on the percentage distribution results from the fact that the lending data used in the calculation covered the entire evaluation period, whereas the market share data was only for 2001.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the “Multi-state Metropolitan Area” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

The geographic distribution of home purchase loans is adequate. The percentage of loans in both low- and moderate-income tracts was lower than the percentage of owner-occupied units in those tracts and is considered adequate. Market share data reflects slightly better performance with the percentage of loans somewhat lower than the overall market share percentage and is adequate.

The geographic distribution of home improvement loans is adequate. The percentage of the bank’s home improvement loans in low-income tracts was somewhat lower than the percentage of owner-occupied units in these areas and is adequate. The low-income market share data indicates similar results. In moderate-income tracts, the percentage of loans was near to the percentage of owner-occupied units and performance is good. The home improvement market share in moderate-income tracts was somewhat lower than the overall market share and reflects adequate performance.

The distribution for refinance loans in the AA is adequate. The percentage of loans in low-income tracts was significantly lower than the percentage of owner-occupied units in those areas and is poor. The percentage of loans in moderate-income tracts was lower than the percentage of owner-occupied units in those areas and is adequate. The market share data reflects adequate performance in low-income tracts with the market share somewhat lower than the overall market share. Moderate-income tract market share reflects excellent performance with the market share in these tracts exceeding the overall market share.

The geographic distribution of multi-family loans is not meaningful due to the low volume.

Small Loans to Businesses

Refer to Table 6 in the “Multi-state Metropolitan Area” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

The distribution of small loans to businesses by income level of geography is good. The percentage of small loans to businesses in low-income tracts was somewhat lower than the percentage of businesses in those areas and is adequate. The market share performance for low-income tracts is adequate with the market share for these tracts lower than the overall market share. Performance in moderate-income tracts reflects excellent performance with the percentage of loans in these tracts exceeding the percentage of businesses in those tracts. Market share reflects a similar level of excellent performance.

Small Loans to Farms

Refer to Table 7 in the “Multi-state Metropolitan Area” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

The bank originated three small loans to farms in this AA during the evaluation period. Analysis of small loans to farms in this AA is not meaningful due to the very small volume.

Lending Gap Analysis

There are no unexplained gaps in lending in the Cincinnati AA. We reviewed reports detailing lending penetration by tract income to reach this conclusion. We also took into consideration the number of owner-occupied units and the income level of borrowers by tract.

Inside/Outside Ratio

The percentage of loans made within the bank’s AAs is good. In reaching this conclusion, we considered the sale of the Florida branches in 2002. The bank had loans in many areas of the state that were AAs at the time the loans were made, but are not AAs for this examination. We calculated the bank’s performance of lending within its AAs on a bank level instead of a state or AA level and combined all home mortgage, small business and small farm loans in the calculation. The bank originated 66% of the number of loans and 72% of the dollar amount of loans within its AAs during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level is good. The distribution of home mortgage loans is good and the distribution of small loans to businesses is adequate. The reader should note that our analysis of lending by borrower income level took into consideration the percentage of households within an AA living below the poverty level and the affordability of housing. These variables affected our expectations regarding the level of home mortgage lending to low-income borrowers.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the “Multi-state Metropolitan Area” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

Borrower distribution for home purchase loans is good in the Cincinnati AA. The percentage of loans to low-income borrowers was significantly lower than the percentage of low-income families and is considered adequate. The market share performance with low-income borrowers reflects adequate performance with the market share for these families lower than the overall market share. The percentage of loans to moderate-income borrowers significantly exceeded the

percentage of moderate-income families and performance is excellent. The market share performance for these borrowers is consistent with the distribution data and is excellent.

The percentage distribution of home improvement loans by borrower income is excellent. The percentage of bank loans to moderate-income borrowers significantly exceeded the percentage of families in that income category and reflects excellent performance. The percentage of loans to low-income borrowers is lower than the percentage of low-income families, but is considered excellent when the capacity of the borrowers was taken into account. The market share data for low-income borrowers was somewhat lower than the overall market share and is considered adequate. The market share percentage for moderate-income borrowers was lower than the overall market share and is considered adequate.

The bank's refinance lending reflects excellent borrower distribution. Performance is lower than the percentage of low-income borrowers, but is considered good when the capacity of the borrowers is taken into consideration. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of families in that category and is excellent. Market share performance is excellent for both low- and moderate-income borrowers. The market share for both income categories exceeded the bank's overall market share for refinance loans.

Small Loans to Businesses

Refer to Table 11 in the "Multi-state Metropolitan Area" 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.

The borrower distribution of small loans to businesses is adequate in the Cincinnati AA. The percentage of small loans to businesses with revenues of \$1 million or less is somewhat lower than the percentage of businesses in that revenue category and is adequate. The percentage of loans for \$100 thousand or less was good for the AA. The market share for lending to small businesses exceeded the bank's overall market share for small business lending and is considered excellent.

Small Loans to Farms

Refer to Table 12 in the "Multi-state Metropolitan Area" 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 farms.

The bank originated three small loans to farms in this AA during the evaluation period. Analysis of small farm loans is not meaningful for the AA due to the very small volume.

Community Development Lending

Refer to Table 1 Lending Volume in the "Multi-state Metropolitan Area" 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 multi-family 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, however.

Community development (CD) lending positively impacted the bank's Lending Test conclusions. HNB's volume of CD loans originated in the AA is excellent. HNB originated 14 CD loans totaling \$30,936 million in this AA during the evaluation period.

CD loans originated by HNB were very responsive to community needs and examples of the bank's loans are discussed below. HNB made \$11.516 million in loans for a health care facility serving low- and moderate-income (LMI) individuals. The bank also made \$10 million in direct loans for the development of affordable housing and \$3.5 million to a non-profit intermediary lender for affordable housing.

Product Innovation and Flexibility

HNB's use of flexible loan programs positively impacted its Lending Test performance. For example, HNB participates in Fannie Mae, HUD and state affordable housing programs to address the affordable housing and rehabilitation needs in its AAs. In addition to government-sponsored programs, the bank has developed and offers its Community Access Mortgage product to borrowers in LMI tracts. This program has higher debt to income ratios and requires the customer to only contribute \$250 of his or her own funds with the remaining funds coming from gifts or other sources.

INVESTMENT TEST

Refer to Table 14 in the "Multi-state Metropolitan Area" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

HNB's performance under the Investment Test in the Cincinnati MMSA is rated "Outstanding."

HNB extended an excellent level of qualified investments in this AA. During the evaluation period, HNB made \$5.440 million in qualified investments. HNB had \$1.964 million in prior period investments from the AA still outstanding as of this examination. These investments continue to address community needs and benefit the AA. Direct investments in affordable housing projects total \$5.481 million and an additional \$1.222 million was invested in state or regional funds facilitating the development of affordable housing. HNB also made an investment of \$500 thousand in a venture capital fund supporting the development of small business. The investments in funds are specifically targeted to the bank's AA. These investments are responsive to identified needs in this AA for affordable housing, economic revitalization of LMI areas and financial assistance for small businesses (refer to the Market Profile in Appendix C for more information). HNB also made contributions and grants totaling \$72 thousand to 22 organizations serving this AA that had community development activities as their primary purposes.

HNB's investment of \$2.529 million in the Lincoln Court affordable housing project is considered complex because of the need for several different sources and types of funding,

including tax-exempt bonds, HOME funds, HOPE VI funds, a CMHA bridge loan and equity investments by different institutions, including HNB. This project will provide 168 units of mixed-income housing in a distressed area near downtown Cincinnati.

SERVICE TEST

The bank's performance under the Service Test in the Cincinnati MMSA is rated "High Satisfactory."

Retail Banking Services

Refer to Table 15 in the "Multi-state Metropolitan Area" 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.

The bank's service delivery systems are accessible to geographies and individuals of different income levels throughout this AA. HNB has 30 full-service branches, two retirement offices and one Private Financial Group (PFG) office in the Cincinnati AA. Five branches, representing 16.67 percent of the bank's branches, are located in moderate-income geographies. The percentage of the bank's branches in moderate-income geographies exceeds the percentage of the population residing in those tracts within the AA. The bank does not have any branches in low-income areas containing eight percent of the population within the AA. Fifty percent of the bank's branches are in middle-income areas and 33 percent are in upper-income areas. Bank management has committed to open new branches in LMI areas within the AA, but those branches have not been opened during the evaluation period. HNB did not open or close any branches in LMI areas during the evaluation period.

The bank's hours and services offered throughout the AA are good. Hours and services offered in the bank's branches are consistent and do not vary in a way that inconveniences people within the AA, particularly LMI areas. In addition to offering Monday through Friday banking hours, many branches offer Saturday banking hours. Branch personnel are also available for appointments outside the standard service hours. Management periodically reviews business hours to ensure they meet the needs of the local community.

The bank's ATM network offers a reasonably effective alternative system for delivering retail-banking services to LMI individuals and geographies. In addition to ATMs at the majority of its offices, HNB also offers ATMs in gasoline stations in the AA. HNB operates 76 ATMs throughout the AA. By geography income level, four percent of the ATMs are in low-, 12 percent are in moderate-, 54 percent are in middle-, and 30 percent are in upper-income geographies.

HNB offers other alternative delivery systems, including banking by telephone and Internet. Telephone banking services are available 24 hours a day via a toll-free telephone number. This service allows customers to open accounts, apply for loans and access deposit and loan information. Telephone banking services are offered in English and Spanish. Internet banking services are also available 24 hours a day. These services allow customers to access account

balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching LMI individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB representatives provided a high level of community development services to numerous organizations serving this AA. HNB employees and officers, including executive management, provided 687 hours of community development services to 40 organizations during the evaluation period. Organizations benefiting from these services are involved in a variety of community development activities, including affordable housing, community services targeted to LMI individuals, and economic development activities targeted to small businesses. Bank representatives often serve in leadership roles, including membership on Boards of Directors and officer positions. Other services involve grant writing and other types of fundraising.

The following are examples of community development services HNB representatives performed in this AA during the evaluation period:

- Bank representatives serve as members of the loan committees for community development organizations, including a non-profit lending intermediary financing affordable housing and a city sponsored company making loans and grants to small businesses.
- Bank representatives participate in homebuyer programs sponsored by several organizations promoting home ownership by LMI individuals.
- Bank personnel participate in financial literacy programs offered by schools and community development organizations. These programs provide low- and moderate-income participants with information on the availability and proper use of banking products and services.
- Bank personnel established and supervise a student bank in an elementary school in the Cincinnati AA. The student body consists primarily of LMI students. Students are taught financial literacy and operate the bank with HNB personnel supervision.

State of Florida Rating

CRA Rating for Florida: Satisfactory

The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- HNB's volume of home mortgage and small business lending is good.
- The distribution of the bank's lending by borrower income and geographic areas is adequate.
- The volume of community development investments made by the bank is adequate.
- The bank provides an adequate level of retail services through its alternative delivery systems. Bank personnel performed an adequate level of community development services in the area.

Description of HNB's Operations in Florida

HNB has two AAs in Florida. The bank operates three Private Financial Group (PFG) branches in these two AAs. Two PFG offices are in the Naples MSA AA and one office is in the Fort Pierce MSA AA. The Naples AA consists of the entire Naples MSA and the Fort Pierce AA consists of 17 tracts in Martin County. As discussed previously, HNB management made a strategic decision to sell its Florida banking operations and these are the remaining bank offices.

HNB reported \$64.9 million in deposits in Florida as of June 30, 2002. This represents 0.39 percent of the bank's total deposit base. According to FDIC deposit market share information as of that date, this ranks HNB as 243rd largest bank in the state with a deposit market share of 0.03 percent. HNB is the 17th largest bank in the Naples AA and 14th largest bank in the Fort Pierce AA with deposit market shares of 0.96 percent and 0.36 percent, respectively. HNB originated 1.46 percent of its reportable loans during the evaluation period in Florida.

HNB only offers private banking and trust services through their offices in the two AAs. The bank offers mortgage lending and indirect auto dealer lending through other channels available in Florida, including mortgage group offices located in areas outside the AAs. HNB does not offer ATM service at its offices in Florida.

Refer to the market profile for the State of Florida in Appendix C for detailed demographics, information from community contacts, and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Florida

Our evaluation in Florida consists of a full-scope evaluation of CRA performance in the Naples AA and a limited-scope evaluation in the Fort Pierce AA. The Naples AA is HNB's largest market in Florida with 92 percent of the reported loans and 86 percent of the bank's deposits.

As discussed in the "Description of the Institution," HNB sold its Florida retail banking operations in 2002. We limited our evaluation to the areas containing branches retained by HNB and did not evaluate the bank's CRA performance in the areas that do not contain any branches because of the 2002 sale. We cannot accurately evaluate the bank's performance in those areas because we do not have performance data for the full evaluation period. Additionally, the sales contract restricts the products and services the bank can offer in Florida. According to bank management, HNB began adhering to the restrictions in the sales contract when it was concluded in 2001. An evaluation of those areas would be problematic because it would be based upon operational strategies that changed during the year and it would be difficult to determine if the performance reflected the bank's CRA performance or the change in the operational strategy.

The ratings for Florida are based primarily on the results of the Naples AA, which is the area receiving a full-scope review. We considered HNB's performance within the context of its operational strategy in Florida and the terms of its sale of the retail banking operation to SunTrust Bank. The offices in Florida are licensed as full-service branches, but operated as PFG offices offering a limited menu of products and services. HNB is also restricted to offering private banking and trust services, mortgage lending and indirect auto lending and leasing by a non-compete clause in the sales agreement with SunTrust. HNB has mortgage group offices in areas of the state outside the two AAs. Appendix A contains additional information regarding the full-scope and limited-scope areas.

In our evaluation of the bank's lending in Florida, we assign more weight to home mortgage loans than small loans to businesses because of HNB's limited menu of products and services.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

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.

The overall volume of lending in the Naples AA is adequate. The bank has an adequate volume

of home purchase and refinance lending. Their market performance when compared to financial institutions with a physical presence was somewhat lower than their deposit market share performance for these products. The bank has an excellent volume of home improvement lending with their market rank and market share significantly exceeding their deposit market rank and market share.

Small business lending volume is good. The market rank for small business loans was slightly lower than their deposit market rank when the out of market credit card banks are removed. The bank did not originate or purchase any small farms loans in the state. The aggregate small farm lending in Naples was very low. HNB did not originate any community development loans in the Naples AA.

Distribution of Loans by Income Level of the Geography

The overall distribution of loans by income level of geography is adequate in the Naples AA. Home mortgage loans reflect adequate overall geographic distribution. Small business geographic distribution is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 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/purchases.

The geographic distribution of home purchase loans is adequate. The percentage of loans in low-income tracts was significantly lower than the percentage of owner-occupied units in these tracts, but is considered adequate because the number of owner-occupied units in the tracts was very small. In moderate-income tracts the percentage of loans was somewhat lower than the percentage of owner-occupied units and is considered adequate. Market share data for low- and moderate-income tracts is excellent with the market share in these tracts exceeding the overall market share for home purchase lending.

The geographic distribution of home improvement loans is considered adequate. The bank made no home improvement loans in low- or moderate-income tracts; however there were limited lending opportunities resulting in a very low number of loans in these tracts by all lenders in the AA. Only three home improvement loans were made in low-income tracts in 2001 and only 20 home improvement loans were originated or purchased in moderate-income tracts.

The geographic distribution of refinance loans is considered adequate. Performance in low-income areas is considered adequate. The bank did not make any loans in these tracts; however the number of owner-occupied homes in these tracts was very small and the lending opportunities were limited. There were only 34 total refinance loans in these tracts in 2001. In moderate-income tracts the percentage of loans is significantly lower than the percentage of owner-occupied units. However, the bank's performance is adequate because the number of owner-occupied units in these tracts was small and lending opportunities were limited. Market share data for moderate-income tracts is excellent with the market share in these tracts exceeding

the bank's overall 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 origination/purchase of small loans to businesses.

The distribution of small loans to businesses by income level of geography is adequate. The percentage of small loans to businesses in low-income tracts was near to the percentage of businesses in those areas and is considered good. Performance in moderate income-tracts reflects adequate performance although the percentage of loans in those tracts was significantly lower than the percentage of businesses in those tracts. Market share data indicates poor performance for both low- and moderate-income tracts with the market share in those tracts significantly lower than the overall market share in the AA. The small number of businesses in low- and moderate-income tracts and the limited lending opportunities mitigate the bank's lending performance in these tracts.

Small Loans to Farm

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 origination/purchase of small loans to farms.

The bank did not originate any small loans to farms in the Naples AA.

Lending Gap Analysis

There are no unexplained gaps in lending in the Naples AA. We reviewed reports detailing lending penetration by tract to reach this conclusion.

Inside/Outside Ratio

The percentage of loans made within the bank's AAs is good. In reaching this conclusion, we considered the sale of the Florida branches in 2002. The bank had loans in many areas of the state that were AAs at the time the loans were made, but are not AAs for this examination. We calculated the bank's performance of lending within its AAs on a bank level instead of a state or AA level and combined all home mortgage, small business and small farm loans in the calculation. The bank originated 66% of the number of loans and 72% of the dollar amount of loans within its AAs during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level is adequate. The distribution of home mortgage loans is adequate and the distribution of small loans to businesses is good. The reader should note that our analysis of lending took into consideration the percentage of households within an AA living below the poverty level and the affordability of housing. These variables affected our expectations regarding the level of home mortgage lending to low-income borrowers.

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.

Borrower distribution for home purchase loans is adequate in the Naples AA. The percentage of loans to low-income borrowers was significantly lower than the percentage of low-income families and is considered adequate when borrowing capacity is taken into consideration. The market share performance for low-income borrowers reflects poor performance. The percentage of loans to moderate-income borrowers was lower than the percentage of moderate-income families and is adequate. The market share performance for moderate-income borrowers is adequate with the market share for these borrowers somewhat lower than the overall market share in the Naples AA.

The borrower distribution for home improvement loans is poor. The percentage of loans to low- and moderate-income borrowers was significantly lower than the percentage of families in these income categories even after affordability and capacity are considered. The market share performance reflects similar poor performance.

The bank's refinance lending reflects adequate borrower distribution. Performance is adequate with respect to low-income borrowers when capacity is considered. The percentage of loans to moderate-income borrowers was somewhat lower than the percentage of families in that income category and is adequate. Market share performance for low-income borrowers is poor with market share for these borrowers lower than overall market share. Market share for moderate-income borrowers significantly exceeded the bank's overall market share for refinance lending and is excellent.

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 origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good.

The percentage of small loans to businesses with revenues of \$1 million or less was slightly lower than the percentage of businesses in that revenue category and is good. The percentage of loans for \$100 thousand or less is good at 58 percent. The market share of lending to small businesses significantly exceeded the bank's overall market share and is considered excellent.

Small Loans to Farm

The bank did not originate any small loans to farms in the Naples AA.

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 multi-family 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, however.

HNB did not originate any community development or multi-family loans in the AA during the evaluation period.

Product Innovation and Flexibility

HNB's use of flexible loan programs positively impacted its Lending Test performance. For example, HNB participates in Fannie Mae, HUD and state affordable housing programs to address the affordable housing and rehabilitation needs in its AAs. In addition to government-sponsored programs, the bank has developed and offers its Community Access Mortgage product to borrowers in low- and moderate-income tracts. This program has higher debt to income ratios and requires the customer to only contribute \$250 of his or her own funds with the remaining funds coming from gifts or other sources.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Fort Pierce AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the lending test in Florida. Refer to the Tables 1 through 12 in the State of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Area Receiving Full-Scope Review

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

The bank's performance under the Investment Test in Florida is rated "Low Satisfactory." Based on the full-scope review, the bank's performance in the Naples AA is adequate.

HNB made one contribution for \$26 thousand during the current evaluation period. The contribution was to a community development organization created by local financial institutions to support community development groups and projects. HNB made one investment for \$100 thousand during the prior period still outstanding as of this examination. The prior period investment continues to support affordable housing in the AA. The volume of investments benefiting the AA is considered adequate because of the limited level of community development opportunities in the area (refer to the Market Profile in Appendix C for more information) and the bank's focus on the midwestern region of the country. HNB's investments

are not considered innovative or complex.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, the bank's performance under the Investment Test in the Fort Pierce AA was not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in Florida. The bank did not make any investments or donations in the AA during the evaluation period. This is not given significant weight because of the affluence of the area, the lack of community development opportunities and the bank's small presence in the area.

SERVICE TEST

Conclusions for Area Receiving Full-Scope Review

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

The bank's performance under the Service Test in Florida is rated "Low Satisfactory." Based on the full-scope review, the bank's performance in the Naples AA is adequate.

Retail Banking Services

HNB has two offices in the AA. These offices are PFG offices that do not offer retail products and services to the general public. These offices only offer products and services for private banking and trust clients. As discussed previously, HNB sold its retail offices in Florida to SunTrust Bank to concentrate retail operations in the midwestern region of the country.

HNB does not have ATMs in the AA, but offers retail banking services through alternative delivery systems, including banking by telephone and Internet. Telephone banking services are available 24 hours a day via a toll-free telephone number. This service allows customers to open accounts, apply for loans and access deposit and loan information. Telephone banking services are offered in English and Spanish. Internet banking services are also available 24 hours a day. This service allows customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching LMI individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB's small staff working in its two offices performed an adequate amount of CD services to organizations serving the AA. HNB employees and officers performed 16 hours of CD service working with six organizations during the evaluation period. These organizations promote affordable housing and economic development activities targeted to small business. A bank representative serves on the Board of Directors for one of these organizations. The following are examples of community development services HNB representatives performed in the AA during

the evaluation period:

- A bank representative serves on the Board of Directors for Habitat for Humanity.
- A bank representative participates in the Collier County Banking Partnership. This is an organization consisting of representatives from local financial institutions established to identify community needs for low- and moderate-income individuals and families and develop plans to meet those needs.
- Bank personnel provide significant support in the development of Jubilation – an affordable housing development in Immokalee. They work with local residents to inform them of credit products and help them apply and qualify for home purchase loans. Members of the community dedicated the local children’s library as the Huntington Children’s Library because of the work performed by bank personnel in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, the bank’s performance under the Service Test in the Fort Pierce AA was not inconsistent with the bank’s overall “Low Satisfactory” performance under the Service Test in Florida. Refer to Table 15 in Appendix D for the facts and data that support this conclusion.

State of Indiana Rating

CRA Rating for Indiana: Satisfactory

The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- HNB originated an adequate volume of home mortgage loans and small loans to businesses.
- The geographic distribution of loans is adequate.
- HNB's distribution of loans by borrower income level is good.
- The bank originated a high volume of community development loans.
- HNB's level of community development investments is excellent.
- Service delivery systems are accessible to geographies and individuals of different income levels throughout the Indianapolis AA. Bank personnel performed a relatively high level of community development services in the area.

Description of HNB's Operations in Indiana

HNB has two AAs in Indiana with 23 branches and 56 ATMs. The Indianapolis AA consists of Marion, Hamilton and Hendricks Counties, seven tracts in Johnson County and nine tracts in Madison County. HNB has 19 HNB branches and 51 ATMs in the Indianapolis AA. The Lafayette AA consists of Tippecanoe County. HNB has four branches and five ATMs in the Lafayette AA. The Indianapolis AA was HNB's major market and accounted for approximately 84 percent of the bank's deposits and 71 percent of the bank's reported loans in Indiana during the evaluation period.

HNB reported \$627 million in deposits in Indiana as of June 30, 2002. The deposits in Indiana represent 3.8 percent of HNB's total deposit base. According to FDIC deposit market share information as of that date, this ranked HNB as the 22nd largest bank in the state with a deposit market share of 0.84 percent. HNB was the eighth largest bank in the Indianapolis AA and the fifth largest bank in the Lafayette AA with deposit market shares of 2.76 percent and 6.57 percent, respectively. HNB originated 7.03 percent of its reportable loans during the evaluation period in Indiana.

HNB offers a full range of credit products, including consumer, commercial and real estate loans, in the two AAs in Indiana. Refer to the market profile for the State of Indiana in Appendix C for detailed demographics, information from community contacts, and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Indiana

The bank has two AAs in Indiana. We performed a full-scope review of CRA performance in the Indianapolis AA. This area is HNB's major market in Indiana. We performed a limited-scope review of the Lafayette AA.

The ratings for Indiana are based primarily on the results of the Indianapolis AA, which is the area that received a full-scope review. Appendix A also contains additional information regarding which areas received full-scope and limited-scope reviews.

When determining conclusions for the Lending Test, we weight home mortgage and small business loans equally. We did not give much weight to small farm loans because agricultural lending is not a focus of HNB and the number of loans originated by the bank is too small for meaningful analysis.

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 the full-scope review, the bank's performance in the Indianapolis AA is good.

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.

The overall volume of lending in the Indianapolis AA is adequate. The bank has an adequate volume of home purchase, home improvement, refinance, small business, and small farm lending. The bank has an excellent volume of community development lending.

The bank's market performance for home mortgage lending, when compared to financial institutions with a physical presence was somewhat lower than their deposit market share performance for these products.

The market rank for small business loans was somewhat lower than their deposit market rank when the out of market credit card banks are removed. The market rank for small farms loans was somewhat lower than their deposit market rank and is adequate.

Distribution of Loans by Income Level of the Geography

The overall distribution of loans by income level of geography is adequate in the Indianapolis AA. Home mortgage loans reflect adequate overall geographic distribution. Small business geographic distribution is good. There are too few small farm loans to conduct a meaningful analysis.

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/purchases.

The geographic distribution of home purchase loans is adequate. The percentage of loans in low-income tracts was significantly lower than the percentage of owner-occupied units in these tracts and is considered poor. In moderate-income tracts performance is adequate with the percentage of loans somewhat lower than the percentage of owner-occupied units. Market share data for low-income tracts is consistent with the geographic distribution performance. Market share performance in moderate-income tracts is excellent with the market share in these tracts exceeding the overall market share for home purchase lending.

The geographic distribution of home improvement loans is considered excellent. The percentage of loans in low- and moderate-income tracts exceeded the percentage of owner-occupied units in those tracts. The market share data for low- and moderate-income tracts reflects similar excellent performance.

The geographic distribution of refinance loans is considered adequate. Performance in low-income areas is considered poor with the percentage of loans in those tracts significantly lower than the percentage of owner-occupied units. In moderate-income tracts performance is adequate with the percentage of loans somewhat lower than the percentage of owner-occupied units. Market share data for low-income tracts indicates adequate performance with the market share in those tracts somewhat lower than the bank's overall market share. Market share data for moderate-income tracts is excellent with the market share in these tracts exceeding the bank's overall 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 origination/purchase of small loans to businesses.

The distribution of small loans to businesses by income level of geography is good. The percentage of small loans to businesses in low-income tracts was near to the percentage of businesses in those areas and is good. Performance in moderate income-tracts reflects excellent performance with the percentage of loans in those tracts equal to the percentage of businesses in those tracts. Market share data indicates excellent performance for both low- and moderate-income tracts with the market share in low-income tracts exceeding the overall market share in the AA.

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 origination/purchase of small loans to farms.

The bank made two small farm loans in the AA. The geographic distribution analysis is not meaningful for the examination.

Lending Gap Analysis

There are no unexplained gaps in lending in the Indianapolis AA. We reviewed reports detailing lending penetration by tract to reach this conclusion.

Inside/Outside Ratio

The percentage of loans made within the bank's AAs is good. In reaching this conclusion, we considered the sale of the Florida branches in 2002. The bank had loans in many areas of the state that were AAs at the time the loans were made, but are not AAs for this examination. We calculated the bank's performance of lending within its AAs on a bank level instead of a state or AA level and combined all home mortgage, small business and small farm loans in the calculation. The bank originated 66% of the number of loans and 72% of the dollar amount of loans within its AAs during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level is good. The distribution of home mortgage loans is excellent and the distribution of small loans to businesses is adequate. The reader should note that our analysis of lending took into consideration the percentage of households within an AA living below the poverty level and the affordability of housing. These variables affected our expectations regarding the level of home mortgage lending to low-income borrowers.

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.

Borrower distribution for home purchase loans is excellent in Indianapolis. The percentage of loans to low-income borrowers was somewhat lower than the percentage of low-income families and is considered excellent when borrowing capacity is taken into consideration. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent. The market share performance for low-income borrowers is excellent with the market share for these borrowers exceeding the overall market share in the Indianapolis AA. Moderate-income market share data reflects adequate performance with the market share somewhat lower than the overall market share.

The borrower distribution for home improvement loans is excellent. The percentage of loans to low-income borrowers was near to the percentage of families in this income category and is considered excellent when borrowing capacity is taken into consideration. Moderate-income

borrower distribution exceeded the percentage of families in this income category and is

excellent. The market share performance for low- and moderate-income families reflects similar excellent performance.

The bank's refinance lending reflects excellent borrower distribution. Performance is good with respect to low-income borrowers when capacity is considered. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of families in that income category and is excellent. Market share performance for low- and moderate-income borrowers is excellent with market share for these borrowers exceeding the overall 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 origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good.

The percentage of small loans to businesses with revenues of \$1 million or less is somewhat lower than the percentage of businesses in that revenue category and is adequate. The percentage of loans for \$100 thousand or less is excellent. The market share of lending to small businesses significantly exceeded the bank's overall market share and is considered excellent.

Small Loans to Farms

Refer to Table 12 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

There are too few loans to small farms to make analysis of this product meaningful in the AA.

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 multi-family 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, however.

CD lending positively impacted lending test conclusions. HNB's volume of CD loans originated in the AA is excellent. HNB originated 10 CD loans totaling \$15.494 million in the AA during the evaluation period.

CD loans originated by HNB were very responsive to community needs. HNB made four loans totaling \$14.525 million to organizations promoting LMI job creation and expansion, including a small business incubator. The bank also made loans totaling \$219.5 thousand to organizations

providing social services to LMI individuals and a loan for \$750 thousand to an organization promoting affordable housing.

Product Innovation and Flexibility

HNB's use of flexible loan programs positively impacted its Lending Test performance. For example, HNB participates in Fannie Mae, HUD and state affordable housing programs to address the affordable housing and rehabilitation needs in its AAs. In addition to government-sponsored programs, the bank has developed and offers its Community Access Mortgage product to borrowers in low- and moderate-income tracts. This program has higher debt to income ratios and requires the customer to only contribute \$250 of his or her own funds with the remaining funds coming from gifts or other sources.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Lafayette AA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in the State of Indiana. Refer to the Tables 1 through 12 in the State of Indiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Area Receiving Full-Scope Review

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

The bank's performance under the Investment Test in Indiana is rated "Outstanding." Based on the full-scope review, the bank's performance in the Indianapolis AA is excellent.

HNB extended an excellent level of qualified investments in this AA. During the evaluation period, HNB made \$1.506 million in qualified investments directly benefiting the AA, and \$345 thousand in funds that specifically target the AA. In addition, the bank had \$2.041 million in prior period investments from the Indianapolis AA still outstanding as of this examination. These investments continue to address community needs and benefit the AA. The bank also made \$68 thousand in contributions and grants to 13 organizations serving the AA that had community development activities as their primary purposes. The volume of investments, contributions and grants is considered excellent given the bank's modest presence in the area (refer to the Market Profile in Appendix C for more information). While none of the investments are considered innovative or complex, all are responsive to identified needs in the Indianapolis AA for affordable housing, financial assistance for small businesses, and revitalization of LMI areas.

Examples of the bank’s qualified investments in this AA are discussed under the following bullet points.

- The bank made a \$1.2 million equity investment in an affordable housing development in Indianapolis. This investment was made in a prior evaluation period and remains outstanding. It continues to address affordable housing needs in the AA.
- HNB made a \$1.106 million equity investment in an affordable rental housing project.
- The bank made a \$400 thousand investment in a Small Business Investment Company (SBIC).

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank’s performance under the Investment Test in the Lafayette AA is weaker than the bank’s overall “Outstanding” performance under the Investment Test in Indiana. Refer to Table 14 in Appendix D for the facts and data that support these conclusions.

The weaker performance in the Lafayette AA is due to the considerably lower volume of qualified investments benefiting the area. This level of community development investments, contributions and grants is good, but is significantly lower than the level of the bank’s qualified investments in the Indianapolis AA.

SERVICE TEST

Conclusions for Area Receiving Full-Scope Review

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

The bank’s performance under the Service Test in Indiana is rated “High Satisfactory.” Based on the full-scope review, the bank’s performance in the Indianapolis AA is good.

Retail Banking Services

The bank’s service delivery systems are accessible to geographies and individuals of different income levels throughout the AA. HNB has one branch in a low-income geography and four branches in moderate-income geographies. The percentage of branches in low-income geographies was slightly lower than the percentage of the population in the AA in low-income geographies. The percentage of the bank’s branches in moderate-income geographies approximated the percentage of the population in the AA area residing in these tracts.

The bank’s record of opening and closing branches in the Indianapolis MSA AA did not significantly impact the accessibility of its delivery systems. HNB opened one branch in a middle-income geography within the AA during the evaluation period.

The bank's hours and services offered throughout the AA are good. Hours and services offered in the bank's branches are consistent and do not vary in a way that inconvenienced people within the AA, particularly LMI areas. In addition to offering Monday through Friday banking hours, many branches offer Saturday banking hours. Branch personnel are also available for appointments outside the standard service hours. Management periodically reviews business hours to ensure they meet the needs of the local community.

The bank's ATM network offers a reasonably effective alternative system for delivering retail-banking services to LMI individuals and geographies. In addition to ATMs at the majority of its offices, HNB also offers ATMs in gasoline stations and convenience stores in the AA. HNB operates 51 ATMs throughout the AA. By geography income level, 7.84 percent of the ATMs were in low-, 19.61 percent were in moderate-, 39.22 percent were in middle-, and 33.33 percent were in upper-income census tracts.

HNB offers other alternative delivery systems, including banking by telephone and Internet. Telephone banking services are available 24 hours a day via a toll-free telephone number. This service allows customers to open accounts, apply for loans and access deposit and loan information. Telephone banking services are offered in English and Spanish. Internet banking services are also available 24 hours a day. This service allows customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching LMI individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB representatives provided a relatively high level of community development services to community development organizations serving the Indianapolis AA. Bank personnel, including executive management, provided over 200 hours of services to 11 community development organizations during the evaluation period. These organizations address community needs by supporting the development of affordable housing, providing community services targeted to LMI individuals, and supporting the creation and expansion of small businesses. Bank representatives often served in leadership roles, including membership on Boards of Directors and officer positions. Other services involved grant writing and other types of fundraising.

The following are examples of community development services HNB representatives provided in the Indianapolis AA during the evaluation period:

- HNB personnel serve on boards of directors for organizations supporting community development, including an organization supporting home rehabilitation for LMI homeowners, a statewide development corporation and an organization supporting the development of technology-focused small businesses.

- Bank representatives worked with a professional athlete to establish a charitable foundation and one representative serves on the board of directors of the foundation. The foundation provides services to LMI children.
- A bank representative has worked with a government agency and assumed a leadership role in promoting the use of a government-sponsored loan program for LMI homebuyers.
- HNB personnel participate in homeownership programs and community forums sponsored by various community organizations. The programs and forums are directed to LMI individuals and families.

Conclusions for Areas Receiving Limited-Scope Reviews

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

State of Michigan Rating

CRA Rating for Michigan: Satisfactory

The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- The overall volume of lending is good and the distribution of loans by geography is adequate.
- The distribution of loans by borrower income is good.
- The volume of community development lending is excellent.
- Bank personnel performed a high level of community development services.
- Service delivery systems are accessible to geographies and individuals of different income levels throughout the bank's AAs.

Description of HNB's Operations in Michigan

HNB has nine AAs in Michigan with 120 branches and 147 ATMs. The Grand Rapids AA consists of Allegan, Kent, Muskegon and Ottawa Counties. HNB has 42 branches and 60 ATM in the Grand Rapids AA. The Detroit AA consists of McComb, Oakland and Wayne Counties. The bank has 40 branches and 45 ATMs in the Detroit AA. The Benton Harbor AA consists of 15 tracts in Berrien County and has one HNB branch and one ATM. The Kalamazoo AA consists of Kalamazoo County and has two branches and five ATMs. The Central West Non-MSA AA consists of Lake, Mecosta, Newaygo, Oceana and Osceola Counties. HNB has eight branches and 11 ATMs in the Central West Non-MSA AA. The Dowagiac/Cass County Non-MSA AA consists of Cass County and has one branch and two ATMs. The Northwest Non-MSA AA consists of Antrim, Benzie, Charlevoix, Crawford, Emmet, Grand Traverse, Kalkaska, Leelanau, Manistee and Mason Counties. HNB has 18 branches and 15 ATMs in the Northwest Non-MSA AA. The Sault Non-MSA AA consists of Chippewa and two tracts in Mackinac Counties. The bank has three branches and two ATMs in the Sault Non-MSA AA. The West Non-MSA AA consists of Ionia and Montcalm Counties. HNB has five branches and five ATMs in the West Non-MSA AA.

HNB reported \$4.66 billion in deposits in Michigan as of June 30, 2002. The deposits in Michigan represent 27.98 percent of HNB's total deposit base. According to FDIC deposit market share information as of that date, this ranked HNB as the seventh largest bank in the state with a deposit market share of 3.68 percent. HNB originated 31.53 percent of its reportable loans in Michigan. The Grand Rapids AA and the Detroit AA are HNB's largest AAs in Michigan. HNB is the second largest bank in the Grand Rapids AA with reported deposits of \$1.301 billion and a market share of 10.29 percent. HNB is the sixth largest bank in the Detroit AA with

deposits of \$2.375 billion and a market share of 3.57 percent. HNB's deposits in the Grand Rapids AA represent 7.8 percent of the bank's total deposit base and deposits in the Detroit AA represent 14.24 percent. The other AAs are significantly smaller in terms of deposit base and number of offices and ATMs.

HNB offers a full range of credit products, including consumer, commercial and real estate loans, in the nine AAs areas in Michigan. Refer to the market profile for the State of Michigan in Appendix C for detailed demographics, information from community contacts, and other performance context information for the AAs that received full-scope reviews.

Scope of Evaluation in Michigan

The bank has nine AAs in Michigan. We performed full-scope reviews of CRA performance in the Grand Rapids AA and Detroit AA. These AAs are HNB's major markets in Michigan.

We performed limited-scope reviews of the Benton Harbor MSA and Kalamazoo MSA AAs. For purposes of analyzing and presenting data in this evaluation, we combined the non-metropolitan Central West, Dowagiac/Cass County, Northwest, Sault and West AAs. These areas were geographically proximate and had similar performance contexts and demographic information.

The ratings for Michigan are based primarily on the results of the Grand Rapids AA and Detroit AA, which are the areas that received full-scope reviews. Appendix A also contains additional information regarding which areas received full-scope and limited-scope reviews.

When determining conclusions for the Lending Test, we weighted home mortgage and small business loans equally. We did not give much weight to small farm loans because agricultural lending is not a focus of HNB.

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 full-scope reviews, the bank's performance in the Grand Rapids AA is good and the Detroit AA is adequate.

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.

The overall volume of lending in the Grand Rapids AA is good. This is based upon an adequate volume of home purchase and refinance lending and a good volume of home improvement, small business, and small farm lending. The bank has an excellent volume of community development

lending in Grand Rapids. The overall volume of lending in the Detroit AA is adequate. The

bank has an adequate volume of home purchase, home improvement, refinance, and small business lending. The bank has an excellent volume of community development lending in Detroit.

The market share performance for home purchase and refinance lending in the Grand Rapids AA is adequate as it was somewhat lower than the deposit market share and rank. Home improvement, small business and small farm market share performance is good as it was slightly lower than the deposit market share performance. We considered the impact of out-of-market lenders when developing these conclusions.

The market share performance for home purchase, home improvement, and refinance lending in the Detroit AA, when compared to financial institutions with a physical presence in the market was somewhat lower than the deposit market share and is adequate. Similar adequate performance was noted with regard to small loans to businesses when the out of market credit card banks are considered.

Distribution of Loans by Income Level of the Geography

The overall distribution of loans by income level of geography is adequate in the Grand Rapids AA and the Detroit AA. Home mortgage loans reflect adequate overall geographic distribution in the Grand Rapids AA and poor distribution in the Detroit AA. Small business geographic distribution is adequate in the Grand Rapids AA and good in the Detroit AA. Small farm geographic distribution is excellent in Grand Rapids. There are too few small farm loans to conduct a meaningful analysis in Detroit.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The geographic distribution in the Grand Rapids AA is adequate. The percentage of home purchase loans in low-income tracts was lower than the percentage of owner-occupied units in those tracts and performance is adequate. In moderate-income tracts performance is good with the percentage of loans slightly lower than the percentage of owner-occupied units. Low-income market share performance is adequate as it was somewhat lower than overall market share. Moderate-income market share exceeded the overall market share in the Grand Rapids AA and is excellent. The geographic distribution of home purchase loans is poor in the Detroit AA. The percentage of loans in low-income tracts was significantly lower than the percentage of owner-occupied units in these tracts and is considered poor. In moderate-income tracts performance is adequate with the percentage of loans lower than the percentage of own-occupied units in these tracts. Market share performance in low-income tracts indicates similar poor performance. In moderate-income tracts performance is excellent with the market share in these tracts exceeding the overall market share for home purchase lending.

The geographic distribution of home improvement loans is considered excellent in the Grand Rapids AA and adequate in the Detroit AA. In the Grand Rapids AA, low- and moderate-income tract distribution is excellent and exceeded the percentage of owner-occupied units in those tracts. The market share performance reflects similar excellent performance in this AA. In the Detroit AA, the percentage of loans in low-income tracts was significantly lower than the percentage of owner-occupied units and is poor. The percentage of loans in moderate-income tracts exceeded the percentage of owner-occupied units in those tracts and is excellent. The market share data for low- and moderate-income tracts reflects similar performance to the tract distribution.

The geographic distribution of refinance loans is considered adequate in the Grand Rapids AA and poor in the Detroit AA. In the Grand Rapids AA performance in low-income tracts is adequate with the percentage of loans lower than the percentage of owner-occupied units. Low-income market share reflects similar poor performance. In moderate-income tracts performance is adequate as the percentage of loans was somewhat lower than the percentage of owner-occupied units in those tracts. The moderate-income market share is excellent with the market share in these tracts exceeding the overall market share. In LMI tracts performance is poor in the Detroit AA with the percentage of loans significantly lower than the percentage of owner-occupied units. Market share data for low-income tracts displays similar poor performance. In moderate-income tracts market share performance is good with the market share in these tracts slightly lower than the bank's overall 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 origination/purchase of small loans to businesses.

The distribution of small loans to businesses by income level of geography is adequate in the Grand Rapids AA and good in the Detroit AA. In Grand Rapids, the percentage of loans in low-income tracts was lower than the percentage of loans in these tracts and is adequate. In moderate-income tracts performance is adequate with the percentage of loans somewhat lower than the percentage of businesses in those tracts. In low-income tracts market share performance is good with the market share in those tracts slightly lower than the overall market share. Market share performance in moderate-income tracts is adequate with the market share in those tracts lower than the overall market share. In the Detroit AA, the percentage of small loans to businesses in low-income tracts was somewhat lower than the percentage of businesses in those areas and is adequate. In moderate-income tracts the percentage of loan exceeded the percentage of businesses in those areas and is considered excellent. Market share data in low- and moderate-income tracts is excellent in Detroit with the market share in these tracts exceeding the overall 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 origination/purchase of small loans to farms.

The bank made one small farm loan in the Detroit AA. The geographic distribution analysis is not meaningful for the examination. In the Grand Rapids AA, the percentage of small farms in low-income tracts is too small to allow a meaningful analysis. In moderate-income tracts the percentage of loans exceeded the percentage of small farms in the tracts and is excellent. Market share performance reflects similar excellent performance.

Lending Gap Analysis

There are no unexplained gaps in lending in the Grand Rapids AA or the Detroit AA. We reviewed reports detailing lending penetration by tract to reach this conclusion.

Inside/Outside Ratio

The percentage of loans made within the bank's AAs is good. In reaching this conclusion, we considered the sale of the Florida branches in 2002. The bank had loans in many areas of the state that were AAs at the time the loans were made, but are not AAs for this examination. We calculated the bank's performance of lending within its AAs on a bank level instead of a state or AA level and combined all home mortgage, small business and small farm loans in the calculation. The bank originated 66% of the number of loans and 72% of the dollar amount of loans within its AAs during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level of the borrower is good in the Grand Rapids and Detroit AAs. Home purchase, home improvement, and refinance lending distribution are excellent in the Grand Rapids AA. The percentage of small loans to farms is good and the distribution of small loans to businesses is adequate. In the Detroit AA, the distribution of home purchase and refinance loans is good, the distribution of small loans to businesses is adequate and the distribution of home improvement loans is excellent. The reader should note that our analysis of lending took into consideration the percentage of households within an AA living below the poverty level and the affordability of housing. These variables affected our expectations regarding the level of home mortgage lending to low-income borrowers.

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.

Borrower distribution for home purchase loans is excellent in the Grand Rapids AA. The percentage of low-income borrowers is somewhat lower than the percentage of low-income families and is excellent when borrowing capacity is considered. The moderate-income borrower distribution is excellent with the percentage of loans exceeding the percentage of moderate-income families. Market share performance reflects similar excellent performance for low-income borrowers. Moderate-income market share is slightly lower than the overall and is

considered good for Grand Rapids. Borrower distribution for home purchase loans is good in the

Detroit AA. The percentage of loans to low-income borrowers was lower than the percentage of low-income families, but is considered adequate when borrowing capacity is taken into consideration. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and is excellent. The market share performance for low- and moderate-income borrowers is good with the market shares for these borrowers slightly lower than the overall market share.

The borrower distribution for home improvement loans is excellent for both the Grand Rapids AA and the Detroit AA. The percentage of loans in both full scope AAs to low-income borrowers was somewhat lower than the percentage of families in this income category and is considered excellent when affordability and capacity are considered. Moderate-income borrower distribution exceeded the percentage of families in this income category and is excellent in both AAs. The market share performance for LMI borrowers exceeded the overall market share and reflects excellent performance in the Detroit and Grand Rapids AAs.

The bank's refinance lending reflects excellent borrower distribution in the Grand Rapids AA and good borrower distribution in the Detroit AA. In Grand Rapids, low-income borrower performance is good because the percentage of loans to low-income borrowers was somewhat lower than the percentage of low-income borrowers. Performance is adequate with respect to low-income borrowers in the Detroit AA when capacity is considered. The percentage of loans to low-income borrowers was lower than the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of families in that income category and is excellent in both full scope areas. Market share performance for LMI borrowers is excellent with market share for these borrowers exceeding the overall market share in Detroit and Grand Rapids.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is adequate in both the Detroit AA and the Grand Rapids AA.

Performance is similar in both the Grand Rapids AA and the Detroit AA. The percentage of small loans to businesses with revenues of \$1 million or less was somewhat lower than the percentage of businesses in that revenue category and is adequate. The percentage of loans for \$100 thousand or less is excellent. The market share of lending to small businesses significantly exceeded the bank's overall market share and is considered excellent.

Small Loans to Farms

Refer to Table 12 in the State of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

There are too few small farm loans to make analysis of this product meaningful in the Detroit AA. In Grand Rapids, borrower distribution is adequate. The percentage of small loans to farms

with revenues of \$1 million or less was somewhat lower than the percentage of farms in that revenue category and is adequate. The percentage of loans for \$100,000 or less is good. The market share of lending to small farms exceeded the bank's overall market share and is excellent.

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 multi-family 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, however.

CD lending was very responsive to community needs and has a positive impact on lending test conclusions. HNB's volume of CD loans originated in the Grand Rapids AA and the Detroit AA is excellent. HNB originated 24 CD loans totaling \$12.287 million in the Grand Rapids AA and 11 CD loans totaling \$52.555 million in the Detroit AA, respectively, during the evaluation period. Examples of CD loans originated during the evaluation period are discussed below.

In the Grand Rapids AA, the bank made seven loans totaling \$2.469 million to an organization providing medical care to LMI individuals. The bank made a loan for \$6.075 million for the construction of a strip mall in a low-income area that created 200 LMI jobs. HNB also made three loans to an organization providing residential counseling and job training for convicted criminals on probation. In the Detroit AA, the bank made a loan for \$11.75 million to revitalize and stabilize a LMI area by redeveloping a landfill into a light industrial park. HNB also made a loan for \$13.8 million for capital improvements and working capital to a firm owning nursing homes serving low- and moderate-income individuals. HNB has also made loans in both AAs supporting other community development organizations. These organizations support the development and rehabilitation of affordable housing, provide social and medical services to LMI individuals and support the development and retention of small businesses.

Product Innovation and Flexibility

HNB's use of flexible loan programs positively impacted its Lending Test performance. For example, HNB participates in Fannie Mae, HUD and state affordable housing programs to address the affordable housing and rehabilitation needs in its AAs. In addition to government-sponsored programs, the bank has developed and offers its Community Access Mortgage product to borrowers in low- and moderate-income tracts. This program has higher debt to income ratios and requires the customer to only contribute \$250 of his or her own funds with the remaining funds coming from gifts or other sources.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Benton Harbor MSA, Kalamazoo MSA and combined limited scope non-metropolitan areas is not

inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Michigan. Refer to the Tables 1 through 12 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

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

The bank's performance under the Investment Test in Michigan is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Grand Rapids AA and the Detroit AA is adequate.

HNB extended an adequate level of qualified investments in the Grand Rapids AA and the Detroit AA. During the evaluation period, HNB invested \$575 thousand in statewide or regional funds which specifically targeted community development needs in the Grand Rapids AA. In addition, the bank had \$2.197 million in prior period investments from the AA still outstanding as of this examination. HNB made \$200 thousand in qualified investments directly benefiting the Detroit AA and \$2.212 million in statewide or regional funds that specifically targeted community development needs in the Detroit AA. Additionally, HNB had \$1.295 million in prior period investments from the AA still outstanding as of this examination. The bank's investments made during prior periods continued to address community development needs in the Grand Rapids and Detroit AAs. HNB has also made \$471 thousand in contributions and grants to 62 community development organizations serving the Grand Rapids AA and \$90 thousand in contributions and grants to 29 community development organizations serving the Detroit AA. The volume of investments, contributions and grants is adequate for these AAs because the total amounts invested during the current period are modest relative to the bank's size and market share in the AAs. The investments are not considered innovative or complex, but are responsive to identified needs in the AAs for affordable housing, financial assistance for small businesses and revitalization of LMI areas.

Examples of HNB's qualified investments in these AAs are discussed under the following bullet points.

- The bank made a \$1.5 million equity investment for the rehabilitation of a large commercial building to be used as office space for small businesses within a Renaissance Zone in the Grand Rapids AA. The investment remains outstanding from the prior evaluation period.
- HNB purchased a \$200 thousand certificate of deposit in a community development bank located in the Detroit AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Benton Harbor AA, the Kalamazoo AA and the combined non-metropolitan AAs is not

inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in Michigan. Refer to Table 14 in Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Area Receiving Full-Scope Review

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

The bank's performance under the Service Test in Michigan is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Grand Rapids AA is good and the performance in the Detroit AA is adequate.

Retail Banking Services

The bank's service delivery systems are accessible to geographies and individuals of different income levels throughout the Grand Rapids AA and reasonably accessible in the Detroit AA. HNB has two branches in low-income geographies and five branches in moderate-income geographies in the Grand Rapids AA. HNB has four branches in moderate-income geographies in the Detroit AA. The bank does not have any branches in low-income geographies in the Detroit AA. The percentage of branches in low-income geographies exceeded the percentage of the population in the Grand Rapids AA in low-income geographies. The percentage of the bank's branches in moderate-income geographies is somewhat below the percentage of the population in the Detroit and Grand Rapids AAs residing in these tracts.

The bank's record of opening and closing branches in the Grand Rapids AA favorably impacted the accessibility of its delivery systems. HNB opened one branch in a low-income geography and opened one branch and closed four branches in middle-income geographies and closed one branch in an upper-income geography within the AA during the evaluation period. Several community contacts commented that the bank's new branch in a low-income area helped stabilize the area and provided needed banking services to local residents. HNB's record of opening and closing branches in the Detroit AA does not significantly impact the accessibility of its delivery systems within the AA. The bank opened an office in a middle-income geography that is adjacent to a moderate-income geography and easily accessible to residents in that geography.

The bank's hours and services offered in the AAs are good. Hours and services offered in the bank's branches are consistent and do not vary in a way that inconvenienced people within the AAs, particularly LMI areas. In addition to offering Monday through Friday banking hours, some offices offer Saturday banking hours. Branch personnel are also available for appointments outside the standard service hours. Management periodically reviews business hours to ensure they meet the needs of the local community.

The bank's ATM network in the AAs offers a reasonably effective alternative system for delivering retail-banking services to LMI individuals and geographies. In addition to ATMs at

the majority of its offices, HNB also offers ATMs in grocery stores in the AAs. HNB operates 60 ATMs in the Grand Rapids AA and 45 ATMs in the Detroit AA. By geography income level, 6.67 percent of the ATMs were in low-, 11.67 percent were in moderate-, 63.33 percent were in middle-, and 18.33 percent were in upper-income geographies in the Grand Rapids AA. In the Detroit AA, 2.22 percent of the ATMs were in low-, 6.67 percent were in moderate-, 44.44 percent were in middle- and 46.67 percent were in upper-income geographies.

HNB offers other alternative delivery systems, including banking by telephone and Internet. Telephone banking services are available 24 hours a day via a toll-free telephone number. This service allows customers to open accounts, apply for loans and access deposit and loan information. Telephone banking services are offered in English and Spanish. Internet banking services are also available 24 hours a day. This service allows customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching LMI individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB representatives provided a high level of community development services to numerous organizations serving the Grand Rapids AA and the Detroit AA. Bank personnel, including executive management, provided over 600 hours of services to community development organizations during the evaluation period in both the Grand Rapids AA and Detroit AA. Bank representatives worked with 42 community development organizations in the Grand Rapids AA and 30 organizations in the Detroit AA. These organizations address community needs by supporting the development of affordable housing, provide community services targeted to LMI individuals, and support the creation and expansion of small businesses. Bank representatives often served in leadership roles, including membership on Boards of Directors and officer positions. Other services involved grant writing and other types of fundraising.

The following are examples of community development services HNB representatives provided in the Grand Rapids AA and Detroit AAs during the evaluation period:

- HNB personnel partner with community development organizations in the Grand Rapids AA and the Detroit AA to open IDA savings account for clients. The savings in the IDAs are used for the down payment and closing costs on homes purchased by low- and moderate-income homebuyers.
- Bank personnel established and supervise a student bank in an elementary school in the Detroit AA. The student body consists primarily of low- and moderate-income students. Students are taught financial literacy and operate the bank with HNB personnel supervision.
- Bank representatives have assumed leadership roles in working with a government housing agency and community organizations in the Grand Rapids AA and the Detroit AA to promote the use of a government-sponsored home improvement loan program for low- and moderate-income homeowners.

- HNB personnel participate in homeownership programs and community forums sponsored by various community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Benton Harbor and the Kalamazoo AAs and the combined non-metropolitan AAs is weaker than the bank's overall "High Satisfactory" performance under the Service Test in Michigan. The bank's performance in these AAs is weaker than its overall performance because the branch and ATM network in these AAs is not as accessible to LMI individuals as in the Grand Rapids AA and Detroit AA. This does not negatively impact the overall rating because the Benton Harbor and Kalamazoo AAs are small AAs for the bank, as measured by deposits and the number of branches and ATMs in the AA. The Grand Rapids AA and Detroit AA are significantly larger than the AAs in which we performed limited-scope reviews. The combined non-metropolitan AAs represent a larger percentage of the bank's deposits, loans and branches than the other limited-scope AAs. The weaker performance does not affect the overall rating because a significant majority of the population in the AAs lives in middle-income tracts with a small percentage living in moderate-income tracts and very small percentage living in low-income tracts. Refer to Table 15 in Appendix D for the facts and data that support these conclusions.

State of Ohio Rating

CRA Rating for Ohio: Satisfactory

The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- The distribution of loans by borrower income is good and geography is adequate.
- HNB's volume of lending is good.
- The volume of community development lending is excellent.
- HNB's volume of community development investments is good.
- Bank personnel performed a high level of community development services.
- Service delivery systems are accessible to geographies and individuals of different income levels throughout the bank's AAs.

Description of HNB's Operations in Ohio

HNB has 15 AAs in Ohio with 161 branches and 418 ATMs. The Cleveland AA consists of Cuyahoga, Geauga and Lake Counties and 11 tracts in Lorain County. HNB has 47 branches and 88 ATMs in the Cleveland AA. The Columbus AA consists of Delaware, Fairfield, Franklin, Licking and Madison Counties. The bank has 51 branches and 211 ATMs in the Columbus AA. The Akron AA consists of Portage County and 25 tracts in Summit County. HNB has 9 branches and 13 ATMs in the Akron AA. The Dayton AA consists of Clark and Montgomery Counties and eight tracts in Greene County. HNB has 13 branches and 31 ATMs in the Dayton AA. The Lima AA consists of Allen County and has four HNB branches and seven ATMs. The Mansfield AA consists of Richland County and has one HNB branch and three ATMs. HNB has designated four tracts in Medina County as the Wadsworth-Cleveland AA and has one branch in the AA. The Toledo AA consists of Lucas and Wood Counties and one tract from Sandusky County. HNB has 17 branches and 37 ATMs in the Toledo AA. The Ashland Non-MSA AA consists of Ashland County and has two HNB branches and three ATMs. The Bellefontaine Non-MSA County consists of Logan County and has two HNB branches and two ATMs. The Chillicothe Non-MSA AA consists of Ross County and has three HNB branches and four ATMs. The Dover Non-MSA AA consists of Tuscarawas County and contains six HNB branches and seven ATMs. The Marysville Non-MSA AA consists of Union County and has one HNB branch and three ATMs. The Port Clinton Non-MSA AA consists of Ottawa County and has two HNB branches and eight ATMs. The Washington Court House Non-MSA AA consists of Fayette County and has two HNB branches and one ATM.

HNB reported \$8.963 billion in deposits in Ohio as of June 30, 2002. The deposits in Ohio represent 53.74 percent of HNB's total deposit base. According to FDIC deposit market share information as of that date, HNB was the sixth largest bank in the state with a deposit market share of 5.04 percent. HNB originated 47 percent of its reportable loans in Ohio. The Columbus AA and the Cleveland AA are HNB's largest AAs in Ohio. HNB is the second largest bank in the Columbus AA with reported deposits of \$4.071 billion and a market share of 17.38 percent. HNB is the seventh largest bank in the Cleveland AA with deposits of \$1.825 billion and a market share of 3.43 percent. HNB's deposits in the Columbus AA represent 24.41 percent of the bank's total deposit base and deposits in the Cleveland AA represent 10.95 percent. The other AAs are significantly smaller in terms of deposit base and number of offices and ATMs.

HNB offers a full range of credit products, including consumer, commercial and real estate loans, in the 15 AAs areas in Ohio. Refer to the market profile for the State of Ohio in Appendix C for detailed demographics, information from community contacts, and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Ohio

The bank has 15 AAs in Ohio. We performed full-scope reviews of CRA performance in the Columbus AA and the Cleveland AA. These AAs are HNB's major markets in Ohio.

We performed limited-scope reviews of the Akron AA, the Dayton AA, the Lima AA, the Mansfield AA, the Toledo AA and the Wadsworth-Cleveland AA. For purposes of analyzing and presenting data in this evaluation, we combined the non-metropolitan Ashland, Bellefontaine, Chillicothe, Dover, Marysville, Port Clinton and Washington Court House AAs. These areas were geographically proximate and had similar performance contexts and demographic information.

The ratings for Ohio are based primarily on the results of the Columbus AA and the Cleveland AA, which are the areas that received full-scope reviews. Appendix A also contains additional information regarding which areas received full-scope and limited-scope reviews.

When determining conclusions for the Lending Test, we weighted home mortgage and small business loans equally. We did not give much weight to small farm loans because agricultural lending is not a focus of HNB.

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 full-scope reviews, the bank's performance in the Columbus and Cleveland AAs is good.

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.

The overall volume of lending in the Columbus AA is good. The bank has a good volume of

home purchase, refinance, small business and small farm lending. The bank has an excellent volume of home improvement lending and has an excellent volume of community development lending during the evaluation period in Columbus. The overall volume of lending in the Cleveland AA is excellent. This is based upon an excellent volume of home purchase, home improvement, small business, and small farm lending and a good volume of refinance lending. The bank has an excellent volume of community development lending in Cleveland.

In the Columbus AA, the market performance for home purchase lending, when compared to financial institutions with a physical presence was slightly lower than their deposit market share performance and is good. The home improvement market share approached the deposit market rank and is excellent. The refinance market rank was slightly lower than the deposit market rank and is good. In the Cleveland AA, the market performance for home purchase lending, when compared to financial institutions with a physical presence, approached their deposit market share performance and is excellent. The home improvement market share equaled the deposit market rank and exceeds the deposit market share and also is excellent. The refinance market rank was slightly lower than the deposit market rank and is good.

In both Cleveland and Columbus, the market rank for small business loans was slightly lower than their deposit market rank when the out of market credit card banks are removed. The market rank for small farm loans was slightly lower than their deposit market rank in Columbus, but in Cleveland, while slightly lower in market rank, exceeds the deposit market share.

Distribution of Loans by Income Level of the Geography

The overall distribution of loans by income level of geography is adequate in the Columbus AA and the Cleveland AA. Home mortgage loans reflect adequate overall geographic distribution in Cleveland and in Columbus. Small business geographic distribution is good in Columbus and in Cleveland. Small farm geographic distribution is poor in Columbus. There are too few small farm loans to conduct a meaningful analysis in Cleveland.

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/purchases.

The geographic distribution of home purchase loans is adequate in Columbus. In low-income tracts the percentage of loans was somewhat lower than the percentage of owner-occupied units and is adequate. The percentage of loans in moderate-income tracts was significantly lower than the percentage of owner-occupied units in these tracts and is considered poor. Market share performance in low-income tracts is good with the market share slightly lower than the overall market share. In moderate-income tracts performance is poor with the market share significantly lower than the overall market share for home purchase lending. The geographic distribution in Cleveland is adequate. The percentage of loans in low-income tracts was significantly lower

than the percentage of owner-occupied units in those tracts and performance is poor. In moderate-income tracts performance is adequate with the percentage of loans somewhat lower

than the percentage of owner-occupied units. Low-income market share performance is adequate as it was somewhat lower than overall market share. Moderate-income market share was slightly lower than the overall market share in Cleveland and is good.

The geographic distribution of home improvement loans is considered good in Columbus and is excellent in Cleveland. In Columbus, the percentage of loans in low-income tracts exceeded the percentage of owner-occupied units and is excellent. The percentage of loans in moderate-income tracts was near the percentage of owner-occupied units in those tracts and is good. The market share data for low-income loans is adequate with the market share somewhat lower than the overall market share. In moderate-income tracts performance reflects good performance with market share substantially meeting the overall market share. In Cleveland, LMI tract distribution was excellent and exceeded the percentage of owner-occupied units in those tracts. The market share performance reflects similar excellent performance in this AA.

The geographic distribution of refinance loans is considered adequate in the Columbus AA and the Cleveland AA. In the Columbus AA, low-income tract performance is adequate with the percentage of loans somewhat lower than the percentage of owner-occupied units. Moderate-income tract performance is adequate in the Columbus AA with the percentage of loans lower than the percentage of owner-occupied units. Market share data for low- and moderate-income tracts displays excellent performance with the market share in the low-income tracts exceeding the bank's overall market share and the market share in moderate-income tracts substantially meets the overall market share. In the Cleveland AA performance in low-income tracts is poor with the percentage of loans significantly lower than the percentage of owner-occupied units. In moderate-income tracts performance is adequate as the percentage of loans was somewhat lower than the percentage of owner-occupied units in those tracts. Market share reflects similar performance to the low- and moderate-income distribution.

Small Loans to Businesses

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

The distribution of small loans to businesses by income level of geography is good in the Columbus AA and the Cleveland AA. In Columbus, the percentage of small loans to businesses in low-income tracts exceeded the percentage of businesses in those areas and is excellent. In moderate-income tracts the percentage of loans was somewhat lower than the percentage of businesses in those areas and is considered adequate. Market share data in low- and moderate-income tracts reflects similar performance to the tract distribution. In Cleveland, the percentage of loans in low-income tracts was somewhat lower than the percentage of loans in these tracts and is adequate. In moderate-income tracts performance is good with the percentage of loans slightly lower than the percentage of businesses in those tracts. In low-income tracts the market share exceeded the overall market share and is excellent. In moderate-income tracts market share performance is adequate with the market share in those tracts lower than the overall 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 origination/purchase of small loans to farms.

The bank made few small loans to farms in the Cleveland AA. The geographic distribution analysis is not meaningful for the examination. In the Columbus AA, there were no small loans to farms in low-income tracts and performance is considered poor for these tracts. In moderate-income tracts the percentage of loans was significantly lower than the percentage of small farms in the tracts and is poor. Market share performance in moderate-income tracts exceeded the overall market share and reflects excellent performance.

Lending Gap Analysis

There are no unexplained gaps in lending in the Columbus AA or the Cleveland AA. We reviewed reports detailing lending penetration by tract to reach this conclusion.

Inside/Outside Ratio

The percentage of loans made within the bank's AAs is good. In reaching this conclusion, we considered the sale of the Florida branches in 2002. The bank had loans in many areas of the state that were AAs at the time the loans were made, but are not AAs for this examination. We calculated the bank's performance of lending within its AAs on a bank level instead of a state or AA level and combined all home mortgage, small business and small farm loans in the calculation. The bank originated 66% of the number of loans and 72% of the dollar amount of loans within its AAs during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level is excellent in the Columbus AA and good in the Cleveland AA. The distribution of home purchase, home improvement, and small loans to farms is excellent in Columbus and the distribution of refinance loans is good. The distribution of small loans to businesses is adequate in the Columbus AA. The distribution of home purchase and refinance loans is good in Cleveland. The distribution of home improvement loans is excellent and the distribution of small loans to businesses is adequate. The small farm lending in Cleveland is not meaningful for analysis due to low volume. The reader should note that our analysis of lending took into consideration the percentage of households within an AA living below the poverty level and the affordability of housing. These variables affected our expectations regarding the level of home mortgage lending to low-income borrowers.

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.

Borrower distribution for home purchase loans is excellent in the Columbus AA. The percentage of loans to low-income borrowers was lower than the percentage of low-income families, but is considered good when borrowing capacity is taken into consideration. The percentage of loans

to moderate-income borrowers significantly exceeded the percentage of moderate-income families and is excellent. The market share performance for low- and moderate-income borrowers is excellent with the market shares for these borrowers exceeding the overall market share. Borrower distribution for home purchase loans is good in the Cleveland AA. The percentage of low-income borrowers was significantly lower than the percentage of low-income families, but is adequate when capacity is considered. The moderate-income borrower distribution is excellent with the percentage of loans significantly exceeding the percentage of moderate-income families. Low-income market share was slightly lower than the overall market share and is good. Moderate-income market share was similar to the overall market share and is excellent.

The borrower distribution for home improvement loans is excellent in the Columbus and Cleveland AAs. The percentage of loans in the Cleveland and Columbus AAs to low-income borrowers was somewhat lower than the percentage of families in this income category and is considered good. Moderate-income borrower distribution in both AAs significantly exceeded the percentage of families in this income category and is excellent. The market share performance for low-income borrowers exceeded the overall market share and reflects excellent performance in the Columbus AA. The market share for moderate-income borrowers was slightly lower than the overall market share and is good. In the Cleveland AA, the low-income market share was somewhat lower than the overall market share and is adequate. The moderate-income market share exceeded the overall market share and is excellent.

The bank's refinance lending reflects good borrower distribution in the Columbus AA and adequate borrower distribution in the Cleveland AA. Performance is adequate with respect to low-income borrowers in Columbus and Cleveland when borrowing capacity is taken into consideration. The percentage of loans to low-income borrowers was significantly lower than the percentage of low-income families. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of families in that income category and is excellent in Cleveland. In Columbus, moderate-income borrower distribution is good with the percentage of loans near to the percentage of moderate-income families. In Columbus, the low-income borrower market share performance substantially met the overall market share and is good. The market share for moderate-income borrowers is adequate with the market share for these borrowers somewhat lower than the overall market share. In Cleveland, low-income borrower market share was lower than the overall market share and is adequate. Moderate-income borrower market share substantially met the overall market share and is good.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is adequate in both the Columbus AA and the Cleveland AA.

The percentage of small loans to businesses with revenues of \$1 million or less was somewhat lower than the percentage of businesses in that revenue category and is adequate in both AAs. The percentage of loans for \$100 thousand or less is excellent in Cleveland and in Columbus.

The market share of lending to small businesses significantly exceeded the bank's overall market share and is considered excellent in both full scope AAs.

Small Loans to Farms

Refer to Table 12 in the State of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

There are too few small farm loans in the Cleveland AA to make analysis of this product meaningful. In Columbus, borrower distribution is excellent. The percentage of small loans to farms with revenues of \$ 1 million or less met the percentage of farms in that revenue category and is excellent. The percentage of loans for \$100 thousand or less is adequate. The market share of lending to small farms exceeded the bank's overall market share and is excellent.

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 multi-family 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, however.

CD lending was very responsive to community needs and has a positive impact on lending test conclusions. HNB's volume of CD loans originated in the Columbus AA and the Cleveland AA is excellent. HNB originated 22 CD loans totaling \$34.164 million in the Columbus AA and 39 CD loans totaling \$57.677 million in the Cleveland AA, respectively, during the evaluation period.

In the Columbus AA, the bank made loans for \$15 million and \$7.15 million for redevelopment of downtown Columbus. These loans are part of the City of Columbus' redevelopment plans for downtown. In the Cleveland AA, HNB made loans totaling \$12.264 million to developers of affordable housing. Most of the housing is in an empowerment zone. HNB has also made loans in both AAs supporting other community development organizations. These organizations support the development and rehabilitation of affordable housing, provide social and medical services to LMI individuals and support the development and retention of small businesses.

Product Innovation and Flexibility

HNB's use of flexible loan programs positively impacted its Lending Test performance. For example, HNB participates in Fannie Mae, HUD and state affordable housing programs to address the affordable housing and rehabilitation needs in its AAs. In addition to government-sponsored programs, the bank developed and offers its Community Access Mortgage product to borrowers in low- and moderate-income tracts. This program has higher debt to income ratios and requires the customer to only contribute \$250 of his or her own funds with the remaining funds coming from gifts or other sources.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Akron AA, the Dayton AA, the Lima AA, the Wadsworth/Cleveland AA, the Toledo AA and the combined limited scope non-metropolitan areas is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Ohio. Performance in the Mansfield AA is weaker than the overall bank performance. This is due to weaker performance in geographic and borrower distribution. Refer to the Tables 1 through 12 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

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

The bank's performance under the Investment Test in Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in both the Columbus AA and the Cleveland AA is good.

HNB extended a good level of qualified investments in the Columbus AA and the Cleveland AA. During the evaluation period, HNB made \$936 thousand in qualified investments directly benefiting the Columbus AA and \$2.480 million in statewide or regional funds that specifically targeted the Columbus AA. In addition, the bank had \$5.437 million in prior period investments from the AA still outstanding as of this examination. HNB made \$428 thousand in qualified investments directly benefiting the Cleveland AA and \$2.869 million in statewide or regional funds that specifically targeted the Cleveland AA. Additionally, HNB had \$5.226 million in prior period investments from the AA still outstanding as of this examination. The investments made in the Columbus and Cleveland AAs during prior periods continue to help address community development needs in the AAs. HNB has also made \$4.491 million in contributions and grants to 49 community development organizations serving the Columbus AA and \$195 thousand in contributions and grants to 36 community development organizations serving the Cleveland AA. The investments are not considered innovative or complex, but are responsive to identified needs in the AAs for affordable housing, financial assistance for small businesses and revitalization of LMI areas.

Examples of HNB's qualified investments in these AAs are discussed under the following bullet points:

- During the current evaluation period, HNB made \$1.980 million in investments in funds supporting the development of affordable housing in areas including the Columbus AA.

- HNB also made donations totaling \$3.095 million to three organizations in Columbus providing social services to low- and moderate-income individuals.
- The bank made a \$1.646 million equity investment for the development of affordable housing in Columbus. The investment was made during the prior evaluation period and continues to help address the need for affordable housing in the AA.
- During the current evaluation period, HNB also made \$2.428 million and \$441 thousand in investments in funds supporting the development of affordable housing and creation and retention of small businesses, respectively, in the Cleveland AA.
- During the prior evaluation period, the bank also made investments totaling \$4.661 million in funds supporting the development of affordable housing in the Cleveland AA. These investments continue to help address the need for affordable housing in the AA.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Dayton AA and the combined non-metropolitan AA is not inconsistent with the bank's overall "High Satisfactory" performance under the Investment Test in Ohio. The bank's performance under the Investment Test in the Akron AA and Mansfield AA is stronger than the bank's overall performance in Ohio because of the significant volume of investments made in those AAs relative to the bank's presence. The bank's performance under the Investment Test in the Lima AA, the Cleveland-Wadsworth AA and the Toledo AA is weaker than the bank's overall performance in Ohio because the dollar amounts of investments made in those AAs are significantly lower than in other AAs within the context of bank presence in those AAs. Refer to Table 14 in Appendix D for the facts and data that support these conclusions.

SERVICE TEST

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

The bank's performance under the Service Test in Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Columbus and Cleveland AAs is good.

Retail Banking Services

The bank's service delivery systems are accessible to geographies and individuals of different income levels throughout the Columbus AA and the Cleveland AA. HNB has three branches in low-income geographies and nine branches in moderate-income geographies in the Columbus AA. HNB has three branches in low-income geographies and four branches in moderate-income geographies in the Cleveland AA. The percentages of branches in LMI geographies in the Columbus AA and the Cleveland AA are lower than the percentages of the population in the AAs in low- and moderate-income geographies except for the percentage of branches in the Cleveland AA in moderate-income geographies that is near to the percentage of population in

those tracts.

The bank's record of opening and closing branches in the Cleveland AA favorably impacted the accessibility of its delivery systems. HNB opened two branches in low-income geographies and two branches in moderate-income geographies within the AA. HNB opened two branches in low-income geographies and one branch in a moderate-income geography in the Columbus AA and closed one branch in a low-income geography and two branches in moderate-income geographies. These did not materially impact the accessibility of its delivery systems.

The bank's hours and services offered in the AAs are good. Hours and services offered in the bank's branches are consistent and do not vary in a way that inconvenienced people within the AAs, particularly LMI areas. In addition to offering Monday through Friday banking hours, many branches offer Saturday banking hours. Branch personnel are also available for appointments outside the standard service hours. Management periodically reviews business hours to ensure they meet the needs of the local community.

The bank's ATM network offers a reasonably effective alternative system for delivering retail-banking services to LMI individuals and geographies. In addition to ATMs at the majority of its offices, HNB offers ATMs in convenience and grocery stores in the AAs. HNB operates 211 ATMs in the Columbus AA and 88 ATMs in the Cleveland AA. By geography income level, 12.62 percent of the ATMs were in low-, 15.53 percent were in moderate-, 29.61 percent were in middle-, and 42.23 percent were in upper-income geographies in the Columbus AA. In the Cleveland AA, 6.02 percent of the ATMs were in low-, 7.23 percent were in moderate-, 50.60 percent were in middle- and 36.14 percent were in upper-income geographies.

HNB offers other alternative delivery systems, including banking by telephone and Internet. Telephone banking services are available 24 hours a day via a toll-free telephone number. This service allows customers to open accounts, apply for loans and access deposit and loan information. Telephone banking services are offered in English and Spanish. Internet banking services are also available 24 hours a day. This service allows customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching LMI individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB representatives provided a high level of community development services to numerous organizations serving the Columbus and Cleveland AAs. Bank personnel, including executive management, provided 2,765 hours of services in the Columbus AA and 1,101 hours of services in the Cleveland AA to community development organizations during the evaluation period. Bank representatives worked with 62 community development organizations in the Columbus AA and 40 organizations in the Cleveland AA. These organizations address community needs by supporting the development of affordable housing, providing community services targeted to LMI individuals, and supporting the creation and expansion of small businesses. Bank representatives often served in leadership roles, including membership on Boards of Directors and officer positions. Other services involved grant writing and other types of fundraising.

The following are examples of community development services HNB representatives provided in the Columbus and Cleveland AAs during the evaluation period:

- Bank personnel established and supervise student-banking programs in elementary schools in the Columbus AA and the Cleveland AA. The student body consists primarily of low- and moderate-income students. Students are taught financial literacy and operate the bank with HNB personnel supervision. Personnel have also provided banking services and training in a nursing home serving LMI residents in a LMI area in the Columbus AA.
- A bank representative is on a task force to develop strategies for reducing the cost of and financing the development of affordable housing in downtown Columbus AA. A bank representative participates on a committee formed by the City of Cleveland consisting of bankers and advocates to address predatory lending issues targeting LMI borrowers.
- HNB personnel provide training for non-profit organizations providing services to LMI individuals and families. They spend a significant number of hours participating in financial literacy and homebuyer/ownership programs and community forums sponsored by various churches and community organizations for LMI individuals and families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Akron AA is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test in Ohio. The bank's performance in the Toledo AA exceeds the bank's overall performance under the service test in Ohio because its branch distribution exceeds the percentages of people living in low- and moderate-income tracts in the AA. The bank's performance under the Service Test in the Dayton AA, the Lima AA, the Mansfield AA, the Wadsworth-Cleveland AA and the combined non-metropolitan AAs is weaker than the bank's overall performance under the Service Test in Ohio. The bank's performance in these AAs is weaker than its overall performance because the branch and ATM network in these AAs was not as accessible to low- and moderate-income individuals as in the Columbus AA and the Cleveland AA. Bank personnel in these AAs did not provide the level of community services as personnel in the Columbus AA and the Cleveland AA. This does not negatively impact the overall rating because these are significantly smaller AAs for the bank than the Columbus AA and the Cleveland AA. Refer to Table 15 in Appendix D for the facts and data that support these conclusions.

State of West Virginia Rating

CRA Rating for West Virginia: 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:

- The overall volume of lending is good.
- The distribution of loans by geography and borrower income is good.
- The volume of community development lending is good.
- Bank personnel performed a fairly high level of community development services.
- Service delivery systems are readily accessible to geographies and individuals of different income levels throughout the bank's AAs.

Description of HNB's Operations in West Virginia

HNB has seven AAs in West Virginia with 35 branches and 118 ATMs. The Charleston AA consists of Kanawha and Putnam Counties. HNB has eight branches and 31 ATMs in the AA. The Huntington AA consists of Cabell and Wayne Counties. HNB has two branches and nine ATMs in the AA. The Parkersburg AA consists of Wood County, West Virginia and part of Washington County, Ohio. The bank has one branch and 12 ATMs in the AA. The Washington, DC AA consists of Berkeley County and contains four branches and five ATMs. The Elkins Non-MSA AA consists of Randolph County and contains one branch and one ATM. The Harrisville Non-MSA AA consists of Ritchie County and contains two branches and three ATMs. The North Central West Virginia Non-MSA AA consists of Harrison, Lewis, Marion, Monongalia and Wetzel Counties. HNB has 17 branches and 57 ATMs in the AA.

HNB reported \$1.522 billion in deposits in West Virginia as of June 30, 2002. The deposits in West Virginia represent 9.13 percent of HNB's total deposit base. According to FDIC deposit market share information as of that date, HNB was the sixth largest bank in the state with a deposit market share of 6.92 percent. HNB originated 6.36 percent of its reportable loans in West Virginia. The North Central Non-MSA AA and the Charleston MSA AA are HNB's largest AAs in West Virginia. HNB is the largest bank in the North Central Non-MSA AA with reported deposits of \$717 million and a market share of 24.28 percent. HNB is the fifth largest bank in the Charleston AA with deposits of \$365 million and a market share of 9.33 percent. HNB's deposits in the North Central Non-MSA AA represent 4.3 percent of the bank's total deposit base and deposits in the Charleston AA represent 2.19 percent. The other AAs are significantly smaller in terms of deposit base and number of offices and ATMs.

HNB offers a full range of credit products, including consumer, commercial and real estate loans, in the seven AAs in West Virginia. Refer to the market profile for the State of West Virginia in Appendix C for detailed demographics, information from community contacts, and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in West Virginia

The bank has seven AAs in West Virginia. We performed a full-scope review of CRA performance in the North Central Non-MSA AA. This AA is the largest for HNB in West Virginia based upon deposit size and branch/ATM network. Additionally, HNB is the largest bank in the AA.

We performed limited-scope reviews of the Charleston AA, the Huntington AA, the Parkersburg AA and the Washington, DC AA. For purposes of analyzing and presenting data in this evaluation, we combined the non-metropolitan Elkins and Harrisville AAs. These areas are geographically proximate and had similar performance contexts and demographic information.

The ratings for West Virginia are based primarily on the result of the North Central Non-MSA AA, which is the area that received a full-scope review. Appendix A also contains additional information regarding which areas received full-scope and limited-scope reviews.

When determining conclusions for the Lending Test, we weighted home mortgage and small business loans equally. We did not give much weight to small farm loans because agricultural lending is not a focus of HNB and the number of loans is too small for a meaningful analysis.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in West Virginia is rated "High Satisfactory." Based on the full-scope review, the bank's performance in the North Central Non-MSA AA is good.

Lending Activity

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

The overall volume of lending in the North Central Non-MSA AA is good. The bank has an adequate volume of home purchase and small business lending. Home improvement and small farm lending volume are excellent. Refinance lending volume is good. The bank had an excellent volume of community development lending.

The market performance for home purchase lending, when compared to financial institutions with a physical presence was somewhat lower than their deposit market share performance. The home improvement market share equaled the deposit market rank and approaches the deposit

market share. The refinance market rank was slightly lower than the deposit market rank. The market rank for small business loans was slightly lower than their deposit market rank when the out of market credit card banks are removed. The market rank for small farms loans was slightly lower than their deposit market rank, but the market share exceeded the deposit market share for this product.

Distribution of Loans by Income Level of the Geography

The overall distribution of loans by income level of geography is good in the North Central Non-MSA AA. Home mortgage loans reflect good overall geographic distribution. Small business geographic distribution is adequate. There are too few small farm loans to conduct a meaningful analysis. There are no low-income tracts in the AA. All analysis reflects the performance in moderate-income tracts.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/ purchases.

The geographic distribution of home purchase loans is excellent. The percentage of loans in moderate-income tracts exceeded the percentage of owner-occupied units in these tracts and is considered excellent. Moderate-income tract market share is also excellent with the market share in these tracts exceeding the overall market share for home purchase lending.

The geographic distribution of home improvement loans is considered excellent. The percentage of loans in moderate-income tracts exceeded the percentage of owner-occupied units in those tracts and is excellent. The market share data for moderate-income tracts reflects similar excellent performance.

The geographic distribution of refinance loans is considered adequate. In moderate-income tracts performance is adequate with the percentage of loans somewhat lower than the percentage of owner-occupied units. Market share data for moderate-income tracts is good with the market share in these tracts slightly lower than the bank's overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses by income level of geography is adequate. The percentage of small loans to businesses in moderate-income tracts was somewhat lower than the percentage of businesses in those areas and is considered adequate. Market share data indicates poor performance for moderate-income tracts with the market share in those tracts significantly lower than the overall market share in the AA.

Small Loans to Farms

Refer to Table 7 in the State of West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The bank made seven small farm loans in the North Central Non-MSA AA. The geographic distribution analysis is not meaningful for the examination.

Lending Gap Analysis

There are no gaps in lending in the North Central Non-MSA AA. We reviewed reports detailing lending penetration by tract to reach this conclusion.

Inside/Outside Ratio

The percentage of loans made within the bank's AAs is good. In reaching this conclusion, we considered the sale of the Florida branches in 2002. The bank had loans in many areas of the state that were AAs at the time the loans were made, but are not AAs for this examination. We calculated the bank's performance of lending within its AAs on a bank level instead of a state or AA level and combined all home mortgage, small business and small farm loans in the calculation. The bank originated 66% of the number of loans and 72% of the dollar amount of loans within its AAs during the evaluation period.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level is good. The distribution of home mortgage loans is good and the distribution of small loans to businesses is excellent. The reader should note that our analysis of lending took into consideration the percentage of households within an AA living below the poverty level and the affordability of housing. These variables affected our expectations regarding the level of home mortgage lending to low-income borrowers.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the State of West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution for home purchase loans is adequate in the North Central Non-MSA AA. The percentage of loans to low-income borrowers was significantly lower than the percentage of low-income families and is considered poor even when borrowing capacity is taken into

consideration. The percentage of loans to moderate-income borrowers was near to the percentage of moderate-income families and is good. The market share performance for low- and moderate-income borrowers is excellent with the market share for these borrowers exceeding the overall market share in the AA.

The borrower distribution for home improvement loans is excellent. The percentage of loans to low-income borrowers was somewhat lower than the percentage of families in this income category and is considered good when affordability and capacity are considered. Moderate-income borrower distribution exceeded the percentage of families in this income category and is excellent. The market share performance for low- and moderate-income borrowers exceeded the overall market share and reflects excellent performance.

The bank's refinance lending reflects adequate borrower distribution. Performance is poor with respect to low-income borrowers even when capacity is considered. The percentage of loans to low-income borrowers was significantly lower than the percentage of low-income families. The percentage of loans to moderate-income borrowers was somewhat lower than the percentage of families in that income category and is adequate. Market share performance for LMI borrowers is excellent with market share for these borrowers exceeding the overall market share.

Small Loans to Businesses

Refer to Table 11 in the State of West Virginia 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.

The borrower distribution of small loans to businesses is excellent.

The percentage of small loans to businesses with revenues of \$1 million or less met the percentage of businesses in that revenue category and is excellent. The percentage of loans for \$100 thousand or less is good. The market share of lending to small businesses significantly exceeded the bank's overall market share and is considered excellent.

Small Loans to Farms

Refer to Table 12 in the State of West Virginia 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 farms.

There are too few small farms loans to make analysis of this product meaningful in the AA.

Community Development Lending

Refer to Table 1 Lending Volume in the State of West Virginia 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 multi-family 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, however.

HNB's CD lending was responsive to community needs and has a positive impact on lending test conclusions. HNB's volume of CD loans originated in the North Central Non-MSA AA is good. HNB originated eight CD loans totaling \$4.441 million in the AA during the evaluation period.

Some of the examples of CD lending in the North Central Non-MSA AA include one loan for \$1.216 million for the establishment of a small business incubator and two loans totaling \$2.2 million for the clean up of a brownfield site and development of the site for retail businesses. The bank also made loans for \$920 thousand for the purchase of real estate used by an organization helping disabled individuals develop independent living skills.

Product Innovation and Flexibility

HNB's use of flexible loan programs positively impacted its Lending Test performance. For example, HNB participates in Fannie Mae, HUD and state affordable housing programs to address the affordable housing and rehabilitation needs in its AAs. In addition to government-sponsored programs, the bank also developed and offers its Community Access Mortgage product to borrowers in low- and moderate-income tracts. This program has higher debt to income ratios and requires the customer to only contribute \$250 of his or her own funds with the remaining funds coming from gifts or other sources.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Charleston AA, the Huntington AA, the Parkersburg AA and combined limited scope non-metropolitan AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in West Virginia. The bank's performance in the Washington, D.C. AA is stronger than the bank's overall performance. This is due to the excellent lending volume and the excellent borrower distribution in the AA. Refer to the Tables 1 through 12 in the State of West Virginia section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

The bank's performance under the Investment Test in West Virginia is rated "Low Satisfactory." Based on the full-scope review, the bank's performance in the North Central Non-MSA AA is adequate.

HNB extended an adequate level of qualified investments in the North Central Non-MSA AA. During the evaluation period, HNB extended \$764 thousand in statewide or regional funds that specifically targeted the North Central Non-MSA AA. During the prior evaluation period, HNB also made \$800 thousand in direct investments in the AA that remain outstanding. These investments continue to help meet the community development needs of the AA. HNB personnel assumed leadership roles in the creation of two of these investments. HNB made \$28 thousand in contributions and grants to five community development organizations serving the North Central Non-MSA AA. The investments are not considered innovative or complex, but are responsive to identified needs in the AA for affordable housing, financial assistance for small

businesses and revitalization of LMI areas.

Examples of HNB's qualified investments in these AAs are discussed under the following bullet points:

- HNB made an investment for \$486 thousand to redevelop an historical building in Fairmont, West Virginia. The redevelopment project is helping revitalize the downtown area by redeveloping a vacant historical building into useable commercial real estate that will be used to create jobs for low- and moderate-income individuals.
- HNB invested \$135 thousand in a Small Business Investment Company (SBIC) providing venture capital to small businesses in West Virginia. The bank also invested \$143 thousand in a New Markets Venture Capital Company providing equity and operational assistance to small businesses in Appalachia, including the North Central Non-MSA AA.
- The bank made an \$800 thousand equity investment to redevelop an historical hotel in Morgantown, West Virginia. The investment preserved an historical building, stabilized a deteriorating area and created new jobs. This investment remains outstanding from a prior period and continues to support the AA by providing jobs for LMI individuals.
- The bank contributed \$10 thousand to a clinic providing medical services to LMI and uninsured patients.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Charleston AA and the Washington, DC AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in West Virginia. The bank's performance under the Investment Test in the Huntington AA and the Parkersburg AA is stronger than the bank's overall performance in West Virginia because of the significant volume of investments made in those AAs relative to the bank's presence. The bank's performance under the Investment Test in the combined non-metropolitan AAs is weaker than the bank's overall performance in West Virginia because the dollar amounts of investments made in those AAs are significantly lower than in other AAs within the context of bank presence in those AAs. The stronger performance in the Huntington and Parkersburg AAs and the weaker performance in the combined non-metropolitan AAs do not impact the overall performance because the bank's presence in these AAs is smaller relative to the North Central Non-MSA, the Charleston and the Washington, DC MSA AAs. Refer to Table 14 in Appendix D for the facts and data that support these conclusions.

SERVICE TEST

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

The bank's performance under the Service Test in West Virginia is rated "Outstanding." Based on the full-scope review, the bank's performance in the North Central Non-MSA AA is excellent.

Retail Banking Services

The bank's service delivery systems are readily accessible to geographies and individuals of different income levels throughout the North Central Non-MSA AA. HNB does not have any branches in low-income geographies and two branches in moderate-income geographies in the AA. The North Central Non-MSA AA does not have any low-income geographies, but the percentage of the bank's branches in moderate-income geographies significantly exceeds the population in the AA in moderate-income geographies.

The bank's record of opening and closing branches in the North Central Non-MSA AA has not impacted the accessibility of its delivery systems. HNB closed one branch in a middle-income geography during the evaluation period.

The bank's hours and services offered in the AAs are good. Hours and services offered in the bank's branches are consistent and do not vary in a way that inconvenienced people within the AAs, particularly LMI areas. In addition to offering Monday through Friday banking hours, many branches offer Saturday banking hours. Branch personnel are also available for appointments outside the standard service hours. Management periodically reviews business hours to ensure they meet the needs of the local community.

The bank's ATM network in the AAs offers a reasonably effective alternative system for delivering retail-banking services to LMI individuals and geographies. In addition to ATMs at the majority of its offices, HNB also offers ATMs in convenience stores and grocery stores in the AAs. HNB operates 57 ATMs in the North Central Non-MSA AA. By geography income level, 19.3 percent of the ATMs are in moderate-, 54.39 percent are in middle-, and 26.31 percent are in upper-income geographies in the North Central Non-MSA AA.

HNB offers other alternative delivery systems, including banking by telephone and Internet. Telephone banking services are available 24 hours a day via a toll-free telephone number. This service allows customers to open accounts, apply for loans and access deposit and loan information. Telephone banking services are offered in English and Spanish. Internet banking services are also available 24 hours a day. This service allows customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching LMI individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB representatives provided a relatively high level of community development services to organizations serving the North Central Non-MSA AA. Bank personnel, including executive management, provided 80 hours of services to four community development organizations during the evaluation period. These organizations address community needs by supporting economic development and providing social services to low- and moderate-income individuals.

Bank representatives served in leadership roles, including membership on Boards of Directors and officer positions. Other services provided by HNB personnel included fundraising for the organizations.

The following are examples of community development services HNB representatives provided in the North Central Non-MSA AA during the evaluation period:

- Bank personnel have assumed several leadership positions with an organization providing services, including shelter, to the homeless in the community.
- A bank representative is on the board of an organization providing social services to low- and moderate-income individuals, including providing financial training, drug rehabilitation and transitional housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Charleston AA, the Parkersburg AA and the Washington, DC AA is not inconsistent with the bank's overall "Outstanding" performance under the Service Test in West Virginia. The bank's performance under the Service Test in the Huntington AA and the combined non-metropolitan AA is weaker than the bank's overall performance under the Service Test in West Virginia. The bank's performance in these AAs is weaker than its overall performance because the branch and ATM network in these AAs is not as accessible to LMI individuals as in the North Central Non-MSA AA. This does not negatively impact the overall rating because these are small AAs for the bank, as measured by deposits and the number of branches and ATMs in the AA. The North Central Non-MSA AA is significantly larger than the AAs in which we performed limited-scope reviews. Refer to Table 15 in 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	Lending Test (excludes CD loans): (01/01/99 to 12/31/02) Investment Test: (07/01/99 to 12/31/02) Service Test: (07/01/99 to 12/31/02) CD Loans: (07/01/99 to 12/31/02)	
Financial Institution	Products Reviewed	
The Huntington National Bank (HNB) Columbus, Ohio	Mortgage loans, small loans to businesses and farms, community development loans, community development investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Huntington Community Development Corporation (HCDC)	Subsidiary of Huntington Bancshares Incorporated	Community Development Investments
Huntington Mortgage Company (HMC) – merged into the Huntington National Bank on 1/1/03.	Subsidiary of The Huntington National Bank	Mortgage loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Cincinnati Multi-state MSA State of Florida Naples MSA #5345 Fort Pierce MSA #2710 State of Indiana Indianapolis MSA #3480 Lafayette MSA #3920 State of Michigan Detroit MSA #2160 Grand Rapids MSA #3000 Benton Harbor MSA #0870 Kalamazoo MSA #3720 Central West Non-MSA Dowagiac/Cass County Non-MSA Northwest Non-MSA	Full Scope Full Scope Limited Scope Full Scope Limited Scope Full Scope Full Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	

Sault Non-MSA	Limited Scope	
West Non-MSA	Limited Scope	
State of Ohio		
Cleveland MSA #1680	Full Scope	
Columbus MSA #1840	Full Scope	
Akron MSA #0080	Limited Scope	
Dayton MSA #2000	Limited Scope	
Lima MSA #4320	Limited Scope	
Mansfield MSA #4800	Limited Scope	
Toledo MSA #8400	Limited Scope	
Wadsworth-Cleveland MSA #1680	Limited Scope	
Ashland Non-MSA	Limited Scope	
Bellefontaine Non-MSA	Limited Scope	
Chillicothe Non-MSA	Limited Scope	
Dover Non-MSA	Limited Scope	
Marysville Non-MSA	Limited Scope	
Port Clinton Non-MSA	Limited Scope	
Washington Court House Non-MSA	Limited Scope	
State of West Virginia	Full Scope	
North Central Non-MSA	Limited Scope	
Charleston MSA #1480	Limited Scope	
Huntington MSA #3400	Limited Scope	
Parkersburg MSA #6020	Limited Scope	
Washington, DC MSA #8840	Limited Scope	
Elkins Non-MSA	Limited Scope	
Parkersburg Non-MSA	Limited Scope	

Appendix B: Summary of Multi-state Metropolitan Area and State Ratings

RATINGS The Huntington National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
The Huntington National Bank	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Cincinnati Multi-State MSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Florida	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Indiana	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Michigan	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
State of Ohio	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of West Virginia	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Test in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

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Cincinnati Multi-state Metropolitan Area

Demographic Information for Full Scope Area: Cincinnati MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	309	12.62	18.45	43.37	25.24	0.32
Population by Geography	1,248,021	8.02	14.23	48.31	29.44	0.00
Owner-Occupied Housing by Geography	292,609	2.54	10.58	51.31	35.57	0.00
Business by Geography	67,503	6.64	11.13	47.52	33.93	0.78
Farms by Geography	1,359	2.13	5.52	59.68	32.52	0.15
Family Distribution by Income Level	325,815	19.95	16.99	23.40	39.66	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	120,354	15.05	21.09	48.99	14.87	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		36,658 64,300 12.47%	Median Housing Value Unemployment Rate (1990 US Census)	73,364 2.59%		

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

Source: 1990 US Census and 2002 HUD updated MFI

HNB has identified Hamilton and Clermont Counties in Ohio and Boone, Campbell and Kenton Counties in Kentucky as the Cincinnati Multi-State Metropolitan Area AA. Competition in the AA is strong with more than 60 competitors operating approximately 500 branches. As of June 30, 2002, HNB operated 29 branches in the AA and the bank's deposits in the AA represented approximately 5% of its total deposits. The bank's deposit market share was 2.86% and its market rank was sixth. Major competitors within the AA include Provident Bank, US Bank, NA, Fifth Third and PNC Bank. Please refer to "Description of the Institution" on page 5 for additional information on the bank's size, business strategy, and products and services.

The local economy is diverse with major employers in the following sectors: service; retail trade; government, financial services; health care; transportation and manufacturing. Cincinnati is the headquarters city for several Fortune 500 companies, including Procter and Gamble, Kroger and Federated Department Stores. The local economy has become more diversified during the evaluation period through growth primarily in the financial services and health care sectors and a reduced reliance on manufacturing. An estimated \$1 billion in development has occurred along the Ohio River, including two new professional sports stadiums and infrastructure for future mixed-use development along the riverfront. Historically economic conditions within the AA have been good, but conditions have declined during the past two years. Current conditions have stabilized and unemployment has declined slightly, but there are no signs of an economic upturn. The current unemployment rate is 4.7% and unemployment during the evaluation period has ranged from 3.0% in December of 2000 to 5.4% in February of 2003.

The Cincinnati MMSA is the second fastest growing metro area in population within Ohio. The growth has occurred in the areas surrounding the City of Cincinnati, which has experienced a decline in population and jobs. The city has several very wealthy neighborhoods, but also has neighborhoods with significant economic and social needs. Racial and economic segregation are issues in Cincinnati according to community representatives we met with during the examination and the neighborhoods with significant needs have large minority populations. Rioting

occurred in several neighborhoods during 2001 in response to the shooting of an unarmed African American teenager by a city police officer. Many businesses were damaged during the rioting and racial tension still exists in these neighborhoods.

There is a large number of community-based organizations in the AA that are engaged in a wide range of activities, including promotion of financial literacy, construction and rehabilitation of affordable housing and creation and retention of retail and industrial businesses. Some organizations address needs throughout the AA. Other organizations focus their efforts on specific neighborhoods with significant needs, such as Over The Rhine, Avondale and Walnut Hills. An empowerment zone containing several areas of the city has been created and programs have been implemented in both the private and public sectors to address the needs of those areas.

We met with representatives of several community-based organizations during the examination. Our contacts within the community indicated that the following are identified community needs:

- Lending for affordable housing construction, rehabilitation and acquisition. In addition to a need for affordable housing in the AA, home rehabilitation lending is a significant need.

According to our contacts, many homes in the AA have deferred maintenance because they are older and owned by senior citizens unable to perform the needed repairs or owned by landlords who will make only the repairs necessary for the homes to be inhabited. The home ownership rate in Cincinnati is approximately 40% and in single digits in some neighborhoods within the city. There is also a need for banks to work with prospective borrowers and offer housing-related loans with flexible terms to allow people with limited and/or negative credit histories to purchase and/or improve homes.

- Full-service bank branches are needed in several areas that do not currently have any branches.
- Small business lending, including micro-loans, and technical assistance.
- Participation in economic development projects through technical assistance and/or financial contributions.

State of Florida

Naples MSA

Demographic Information for Full Scope Area: Naples MSA - HNB						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	6.45	12.90	41.94	38.71	0.00
Population by Geography	152,099	5.23	10.56	59.09	25.11	0.00
Owner-Occupied Housing by Geography	43,319	1.18	7.73	57.92	33.17	0.00
Business by Geography	25,473	1.43	3.92	57.32	37.33	0.00
Farms by Geography	735	1.50	15.37	62.18	20.95	0.00
Family Distribution by Income Level	44,136	17.77	19.99	22.95	39.29	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	16,666	8.45	16.01	60.16	15.38	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		38,428 69,800 8.05%	Median Housing Value Unemployment Rate (1990 US Census)		161,155 1.83%	

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

Source: 1990 US Census and 2002 HUD updated MFI

HNB has identified the Naples, Florida MSA, consisting of Collier County, as the Naples AA. Competition in the AA is strong with over 30 competitors operating approximately 115 branches. HNB operates 2 private banking offices in the AA. These offices serve only private banking clients, but are licensed as full service branches. The bank's deposits in the AA represent 0.34% of its total deposits. As of June 30, 2002, HNB's deposit market share was 0.96% and its market rank was seventeenth. Major competitors within the AA include Bank of America, N.A., Wachovia Bank, N.A., First National Bank of Florida, Orion Bank and AmSouth Bank. Please refer to "Description of the Institution" on page 5 for additional information on the bank's size, business strategy, and products and services.

The Naples MSA is one of the fastest growing areas in the country. It is an affluent resort and retirement area. The local economy is seasonal and the population increases by one-third during the winter months and the unemployment rate decreases significantly. The median family income in the AA is the highest in Florida. However, the population is a mix of low-wage workers and wealthy retirees. Residents aged 65 or older represent 25% of the population. Approximately 70% of the population is employed in sectors with average wages less than 80% of the median family income. Significant employment sectors are transportation, goods production, leisure and hospitality, service and health care.

Based upon discussions with community groups in other recently conducted examinations, the opportunities are scarce for community development lending, investment and services within the AA. There is a need for loans to construct, rehabilitate and purchase affordable housing. There is also a need for small business loans to promote economic development. There are a limited number of non-profit organizations focusing on providing affordable housing and community services to low- and moderate-income areas and people. In addition, Collier County has an

economic development council that works closely with the state-designated enterprise zones of Everglades City and Immokalee. The AA has limited community development investments available in the form of government sponsored bonds and low-income housing tax credits.

State of Indiana

Indianapolis MSA

Demographic Information for Full Scope Area: Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	254	9.45	24.80	38.98	26.38	0.39
Population by Geography	1,052,853	6.53	23.00	38.91	31.56	0.00
Owner-Occupied Housing by Geography	252,731	4.00	19.30	39.18	37.52	0.00
Business by Geography	62,579	8.09	15.75	34.08	41.94	0.14
Farms by Geography	1,710	0.82	6.61	53.39	39.18	0.00
Family Distribution by Income Level	280,205	18.83	18.44	23.53	39.20	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	104,424	11.49	35.34	38.22	14.95	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		37,198 64,100 9.91%	Median Housing Value Unemployment Rate (1990 US Census)		67,970 2.64%	

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

Source: 1990 US Census and 2002 HUD updated MFI

HNB has identified all of Marion, Hamilton and Hendricks Counties and parts of Johnson and Madison Counties as the Indianapolis AA. Competition in the AA is strong with more than 40 competitors operating approximately 450 branches. As of June 30, 2002, Huntington operated 19 branches in the AA and the bank's deposits in the AA represented 3.26% of its total deposits. The bank's deposit market share was 2.76% and its market rank was eighth. Major competitors within the AA include Bank One N.A., National City Bank of Indiana, Fifth Third Bank, Union Federal Bank, First Indiana Bank N.A., and Union Planters Bank N.A. Please refer to "Description of the Institution" on page 5 for additional information on the bank's size, business strategy, and products and services.

Economic conditions within the AA are weak. Unemployment has increased during 2003 and remains at a historically high level. The current unemployment rate is 4.7% and unemployment during the evaluation period has ranged from 1.9% in October of 2000 to 4.9% in February of 2003. The decline in unemployment from 4.9% to the current 4.7% is due primarily to contraction in the labor force as unemployed people stop looking for work. The local economy is diverse with major employers in the following sectors: service; government; retail trade; health care; manufacturing; and financial services. The downturn in the economy is concentrated in business and professional services and the leisure and hospitality sector. Manufacturing is experiencing some growth, but health care is expected to be a primary source of employment growth through direct hires with spillover effects in services and retail trade sectors driven by the high incomes in the health care sector. The cost of living, including housing, in the AA is low compared to other midwestern metropolitan areas.

We discussed community needs with several community-based organizations. Our contacts within the community indicated that the following are identified community needs:

- Home financing, especially for borrowers with credit problems or minimal credit history.
- Home improvement financing.

According to our contacts, there is an adequate supply of affordable housing within the AA. The issues are quality of housing and financing for the purchase/improvement of it.

- Full-service bank branches are needed in several areas that do not currently have any branches.

Our contacts told us payday lenders and check cashers are filling the gaps created by the absence of banks in low- and moderate-income areas.

- Small business lending, including micro-loans, and technical assistance.
- Participation in economic development projects through technical assistance and/or financial contributions.

State of Michigan

Detroit MSA

Demographic Information for Full Scope Area: Detroit MSA – HNB						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,088	18.11	15.81	39.43	25.46	1.19
Population by Geography	3,912,679	14.69	15.62	41.21	28.39	0.09
Owner-Occupied Housing by Geography	1,001,501	8.43	13.24	45.66	32.67	0.00
Business by Geography	194,417	6.55	11.25	42.60	39.42	0.18
Farms by Geography	3,722	2.10	8.09	50.89	38.93	0.00
Family Distribution by Income Level	1,032,646	21.99	16.51	21.95	39.55	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	397,578	25.92	22.80	38.64	12.64	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		40,727 69,900 13.09%	Median Housing Value Unemployment Rate (1990 US Census)		71,008 4.44%	

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

Source: 1990 US Census and 2002 HUD updated MFI

HNB has identified Macomb, Oakland and Wayne Counties as the Detroit AA. Competition in the AA is strong with more than 45 competitors operating over 900 branches. As of June 30, 2002, Huntington operated 40 branches in the AA and the bank's deposits in the AA represented approximately 12.28% of its total deposits. The bank's deposit market share was 3.57% and its market rank was sixth. Major competitors within the AA include Comerica Bank, Standard Federal Bank NA, Bank One NA, Charter One Bank NA, National City Bank and Fifth Third Bank. Please refer to "Description of the Institution" on page 5 for additional information on the bank's size, business strategy, and products and services.

Current economic conditions are weak, but are improving from a severe downturn. Although the local economy is slowly diversifying, the auto industry (automakers and related industries) remains a significant factor in Detroit's economic outlook. Employment in the auto industry has stabilized and employment in some service industries is rebounding. However, other significant sectors of the economy, including construction, government, retail and tourism, are eliminating jobs. The current unemployment rate is 7.2% and unemployment during the evaluation period has ranged from 2.6% in May of 2000 to 7.4% in July of 2002. Population growth has diminished significantly during the past ten years and can negatively impact the local economic because of weak labor force growth.

We met with representatives of several community-based organizations and the City of Detroit. Our contacts within the community indicated that the following are identified community needs:

- Neighborhood development.
- Lending for affordable housing construction, rehabilitation and acquisition.
- Home improvement lending.

- Small business lending, including micro-loans. There is also a need for technical assistance to be provided to small businesses.

According to our contacts, there are many areas in need of revitalization, including housing construction/rehabilitation and job creation through the development and expansion of small businesses.

- Many consumers and small businesses need loan programs with flexible terms because of minimal credit history or past credit problems.
- Participation in economic development projects through technical assistance and/or financial contributions.

An Empowerment Zone has been established in Detroit to address many of these needs. Our contacts emphasized the need for additional resources to address these needs and the many opportunities available for financial institutions to help address them.

State of Michigan

Grand Rapids MSA

Demographic Information for Full Scope Area: Grand Rapids MSA - HNB						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	211	8.53	15.64	58.29	16.59	0.95
Population by Geography	937,891	4.72	14.05	62.19	19.04	0.00
Owner-Occupied Housing by Geography	245,806	2.53	11.79	64.86	20.82	0.00
Business by Geography	54,803	6.74	13.04	59.72	20.50	0.00
Farms by Geography	2,467	0.93	7.66	74.75	16.66	0.00
Family Distribution by Income Level	247,505	17.73	18.32	26.77	37.18	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	89,235	8.43	21.14	60.52	9.90	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		36,722 61,300 9.51%	Median Housing Value Unemployment Rate (1990 US Census)		65,034 2.86%	

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

Source: 1990 US Census and 2002 HUD updated MFI

HNB has identified Allegan, Kent, Muskegon and Ottawa Counties as the Grand Rapids AA. There are 36 financial institutions in the AA with approximately 350 offices. As of June 30, 2002, HNB operated 47 branches in the AA and the bank's deposits in the AA represented approximately 9.77% of its total deposits, its deposit market share was 10.29% and its market rank was second. Major competitors within the AA include Fifth Third Bank, Bank One, N.A., National City Bank and Mercantile Bank of West Michigan. Please refer to "Description of the Institution" on page 5 for additional information on the bank's size, business strategy, and products and services.

Local economic conditions are weak and continue to deteriorate. Manufacturing is a significant factor in the local economy and its downturn has negatively impacted economic conditions. Although manufacturing is stabilizing, other industries such as construction, transportation, leisure/hospitality, government and life sciences (research and development) are declining. Unemployment in the AA is currently 7.6%, which is the highest rate during the evaluation period. The lowest unemployment rate during the evaluation period was 2.4% in May of 2000.

We contacted representatives of several community-based organizations and the City of Grand Rapids to discuss community needs. Our contacts indicated that the following are identified community needs:

- Lending for affordable housing for lease and purchase.
- Home improvement lending.

According to our contacts, there is a shortage of affordable housing for purchase and rent within the AA. They also said there is a need for banks to work with prospective borrowers and offer housing-related loans with flexible terms to allow people with limited and/or negative credit histories to purchase and/or improve homes.

- Small business lending, including micro-loans and technical assistance to the business managers and owners.
- Full-service bank branches are needed in several areas that do not currently have any branches.
- Participation in economic development projects through technical assistance and/or financial contributions.

State of Ohio

Cleveland MSA

Demographic Information for Full Scope Area: Cleveland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	599	18.53	16.03	39.07	23.71	2.67
Population by Geography	1,764,668	11.69	13.74	45.50	28.98	0.09
Owner-Occupied Housing by Geography	448,843	5.71	9.94	50.17	34.17	0.01
Business by Geography	88,444	8.35	8.70	41.42	37.68	3.84
Farms by Geography	1,830	2.24	5.08	46.99	45.46	0.22
Family Distribution by Income Level	471,214	19.90	16.93	23.60	39.58	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	173,541	21.90	21.03	42.68	14.38	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		36,500 60,000 12.11%	Median Housing Value Unemployment Rate (1990 US Census)		74,524 3.37%	

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

Source: 1990 US Census and 2002 HUD updated MFI

HNB has identified Cuyahoga, Geauga and Lake Counties and eleven tracts in Lorain County as the Cleveland AA. Competition in the AA is strong with more than 40 competitors operating over 600 branches. As of June 30, 2002, Huntington operated 49 branches in the AA and the bank's deposits in the AA represented approximately 11% of its total deposits. The bank's deposit market share was 3.43% and its market rank was seventh. Major competitors within the AA include KeyBank, NA, National City Bank, NA, Charter One Bank, NA, Fifth Third Bank and Third Federal Savings. Please refer to "Description of the Institution" on page 5 for additional information on the bank's size, business strategy, and products and services.

The local economy is diverse with major employers in the following sectors: service; retail trade; finance, insurance, and real estate; health care; manufacturing; wholesale trade; and construction. Economic diversity within the AA has increased during the evaluation period primarily due to expansion in the finance sector. However, manufacturing remains a significant element of the local economy. Economic conditions within the AA have weakened during the past two years because the national recession has negatively impacted manufacturing and retail trade. Current economic conditions remain weak although conditions within some sectors have stabilized or improved. The current unemployment rate is 6.3% and unemployment during the evaluation period has ranged from 3.9% in November of 2000 to 7.3% in February of 2003.

Cleveland has several empowerment zones with programs to address needs in those areas using Community Development Block Grant funds and other forms of funding. The City of Cleveland is offering tax incentives for the purchase of homes in low- and moderate-income areas and pursuing agreements with banks to address various community needs. There are a variety of community groups addressing housing, economic and social issues within the AA; some groups are focused on specific neighborhoods and others are city wide, regional or state organizations.

We met with representatives of several community-based organizations and the City of Cleveland. Our contacts within the community indicated that the following are identified community needs:

- Lending for affordable housing construction, rehabilitation and acquisition.
- Home improvement lending.

According to our contacts, there is a shortage of affordable housing within the AA, especially within the City of Cleveland. There is also a need for banks to work with prospective borrowers and offer housing-related loans with flexible terms to allow people with limited and/or negative credit histories to purchase and/or improve homes.

- Small business lending, including micro-loans, and technical assistance.
- Availability of deposit products to people with minor derogatory items reported in ChexSystems.
- Participation in economic development projects through technical assistance and/or financial contributions.
- Full-service bank branches are needed in several areas that do not currently have any branches.

State of Ohio

Columbus MSA

Demographic Information for Full Scope Area: Columbus MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	330	10.91	24.24	42.73	21.21	0.91
Population by Geography	1,297,195	9.31	20.07	42.38	28.21	0.03
Owner-Occupied Housing by Geography	295,765	3.86	16.17	46.14	33.84	0.00
Business by Geography	76,705	7.66	14.56	39.18	36.99	1.61
Farms by Geography	2,835	1.41	6.81	62.33	29.35	0.11
Family Distribution by Income Level	336,609	18.93	17.87	24.56	38.64	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	123,882	14.69	29.76	43.15	12.39	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		36,792 63,400 11.49%	Median Housing Value Unemployment Rate (1990 US Census)		74,362 2.74%	

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

Source: 1990 US Census and 2002 HUD updated MFI

HNB has identified Delaware, Fairfield, Franklin, Licking and Madison Counties as the Columbus MSA AA. Competition in the AA is very strong with approximately 50 competitors operating over 400 branches. As of June 30, 2002, Huntington operated 55 branches in the AA and the bank's deposits in the AA represented 24% of its total deposits. The bank's deposit market share was 17% and its market rank was second. Major competitors within the AA include Bank One, NA, Fifth Third Bank, National City Bank, NA, and Park National Bank. Please refer to "Description of the Institution" on page 5 for additional information on the bank's size, business strategy, and products and services.

The local economy is diverse with major employers in the following sectors: government; education; finance, insurance, and real estate; health care; retail goods; and manufacturing. Economic conditions have weakened within the AA during the evaluation period. Two indicators of the weakening local economy are high commercial real estate vacancies and increasing unemployment. The vacancy rate for commercial property within the AA is approximately 25%. Unemployment is currently at its highest point during the evaluation period at 5.5%. The local economy has been insulated by the presence of the state government and Ohio State University. The current local unemployment rate is lower than the state unemployment rate of 6.2% and the national unemployment rate of 6.4%. Income levels are also increasing and the population growth rate in Columbus is the highest of the metro areas within the state. These factors are contributing to increasing housing costs within the AA.

The City of Columbus has identified several areas for redevelopment and has programs offering tax incentives and other subsidies to encourage the development of housing and businesses in those areas. Columbus also has an area selected by HUD as an empowerment zone. There are a variety of community groups addressing housing, economic and social issues within the AA;

some of the groups are focused on specific neighborhoods and others are city wide, regional or state organizations.

We met with representatives of several community-based organizations and the City of Columbus. Our contacts within the community indicated that the following are identified community needs:

- Lending for affordable housing construction and acquisition.
- Home improvement lending.

According to our contacts, there is a shortage of inhabitable affordable housing within the AA. Areas within the AA need home improvement loans to make existing homes inhabitable and loans for new construction of affordable housing. Our contacts stated there is a need for banks to work with prospective borrowers and offer housing-related loans with flexible terms to allow people with limited and/or negative credit histories to purchase and/or improve homes.

- Full-service bank branches are needed in several areas that do not currently have any branches.
- Small business lending, including micro-loans, and technical assistance.
- Businesses offering basic retail goods, including groceries, are lacking in LMI areas within the AA. Several contacts said banks can help by encouraging the establishment of retail businesses within these areas.
- Participation in economic development projects through technical assistance and/or financial contributions.

State of West Virginia

North Central West Virginia Non-Metropolitan Area

Demographic Information for Full Scope Area: North Central WV Non Metropolitan Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	67	0.00	4.48	58.21	37.31	0.00
Population by Geography	238,610	0.00	2.66	57.25	40.09	0.00
Owner-Occupied Housing by Geography	65,441	0.00	2.10	55.80	42.11	0.00
Business by Geography	12,278	0.00	7.27	51.89	40.85	0.00
Farms by Geography	237	0.00	5.91	52.74	41.35	0.00
Family Distribution by Income Level	63,265	17.75	14.45	18.90	48.91	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	20,368	0.00	4.30	65.78	29.92	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		22,654 32,400 19.73%	Median Housing Value Unemployment Rate (1990 US Census)	50,571 4.26%		

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

Source: 1990 US Census and 2002 HUD updated MFI

HNB has identified the Harrison, Lewis, Marion, Monongalia and Wetzel Counties as the North Central West Virginia AA. The AA is in the north central part of the state. Competition in the AA is strong with 20 competitors operating 91 branches. As of June 30, 2002, HNB operated 17 offices in the area. The bank's deposits in the AA represented 4.3% of its total deposits, its deposit market share was 24% and its market rank was first. Major competitors within the AA include Branch Banking and Trust Company, Wesbanco Bank, Bank One, N.A., and United Bank. Please refer to "Description of the Institution" on page 5 for additional information on the bank's size, business strategy, and products and services.

Economic conditions with the AA are weak due to the declining manufacturing sector, the continuing structural decline in the coal industry and the need for new industries. However, there have been some employment gains in services and construction that have helped stabilize the local economy. The current unemployment rates for the counties within the AA reflect some improvement in employment. Unemployment varies from a high rate of 10.2% in Lewis County to a low of 3.1% in Monongalia County. The other three counties in the AA have unemployment rates ranging from 5.9% to 7.1%. Generally, Lewis and Monongalia Counties have represented the weakest and strongest local economies, respectively, based upon employment within the AA during the evaluation period and the other counties have remained within that range with periodic exceptions. Primary employment sectors are retail, education, health care, government, construction and manufacturing. Although economic conditions are weak and many of the employment sectors are low paying, the AA does not have any low-income tracts and only three moderate-income tracts within the 67 tracts of the AA.

We met with representatives of several community development organizations during the examination. Our contacts indicated that the following are identified community needs:

- Lending for affordable housing construction, rehabilitation and acquisition.
- Home improvement lending.
- Small business lending, including micro-loans, and technical assistance.
- Participation in economic development projects through technical assistance and/or financial contributions.

Appendix D: Tables of Performance Data

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Content of Standardized Tables

A separate set of tables is provided for each state. 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: 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. 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.

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 AA may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.

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 AA.

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 AA.

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 AA. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

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.

Table 1. Lending Volume

LENDING VOLUME		Geography: CINCINNATI MMSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						
MA/Assessment Area (2002):	% 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 OH/KY/IN MMSA	100.00	5,030	419,109	1,793	205,586	3	119	14	30,936	6,840	655,750	100.00

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1999 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: CINCINNATI MMSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					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:																
Cincinnati OH/KY/IN MMSA	1,820	100.00	2.54	1.54	10.58	6.26	51.31	50.27	35.57	41.92	1.73	1.37	1.32	1.67	1.96	

* Based on 2001 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CINCINNATI MMSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati OH/KY/IN MMSA	985	100.00	2.54	2.03	10.58	9.95	51.31	58.68	35.57	29.34	5.20	4.03	3.77	5.69	4.93

* Based on 2001 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: CINCINNATI MMSA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																								
Cincinnati OH/KY/IN MMSA	2,219	100.00	2.54	1.13	10.58	6.53	51.31	50.25	35.57	42.09	1.13	0.80	1.20	1.18	1.08									

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CINCINNATI MMSA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cincinnati OH/KY/IN MMSA	6	100.00	18.90	0.00	19.22	0.00	43.97	50.00	17.91	50.00	0.80	0.00	0.00	0.00	4.17	

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: CINCINNATI MMSA															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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 OH/KY/IN MMSA	1,793	100.00	6.64	5.27	11.13	11.50	47.52	49.49	33.93	33.73	1.24	0.83	1.51	1.39	1.18

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: CINCINNATI MMSA															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati OH/KY/IN MMSA	3	100.00	2.13	0.00	5.52	0.00	59.68	66.67	32.52	33.33	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CINCINNATI MMSA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
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 OH/KY/IN MMSA	1,820	100.00	19.95	8.90	16.99	23.30	23.40	26.86	39.66	40.93	2.02	1.07	2.03	1.78	2.57	

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 1.21% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CINCINNATI MMSA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
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:																
Cincinnati OH/KY/IN MMSA	985	100.00	19.95	12.11	16.99	21.67	23.40	31.94	39.66	34.28	5.31	4.44	4.60	5.85	5.76	

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 0.20% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 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: CINCINNATI MMSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					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:															
Cincinnati OH/KY/IN MMSA	2,219	100.00	19.95	10.85	16.99	22.86	23.40	29.13	39.66	37.17	1.30	1.58	1.45	1.37	1.11

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 3.61% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CINCINNATI MMSA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
MA/Assessment Area:	#	% 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 OH/KY/IN MMSA	1,793	100.00	76.49	54.60	75.79	11.04	13.16	1.24	1.80

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 15.84% 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: CINCINNATI MMSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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 \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Cincinnati OH/KY/IN MMSA	3	100.00	91.32	66.67	100.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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: CINCINNATI MMSA									
Evaluation Period: JULY 1, 1999 TO DECEMBER 31, 2002									
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 OH/KY/IN MMSA	12	1,964	42	5,440	54	7,404	100.00	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: CINCINNATI MMSA				Evaluation Period: JULY 1, 1999 TO DECEMBER 31, 2002									
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:																	
Cincinnati OH/KY/IN MMSA	100.00	30	100.00	0.00	16.67	50.00	33.33	0	0	0	0	0	0	8.02	14.23	48.31	29.44

Table 1. Lending Volume

LENDING VOLUME												
Geography: FLORIDA												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% 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:												
Naples MSA	92.15	454	117,482	74	16,645	0	0	0	0	528	134,127	86.32
Limited Review:												
Ft. Pierce MSA	7.85	36	8,674	9	1,301	0	0	0	0	45	9,975	13.68

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1999 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						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:																
Naples MSA	286	93.16	1.18	0.35	7.73	5.59	57.92	45.10	33.17	48.95	0.53	2.86	0.59	0.38	0.77	
Limited Review:																
Ft. Pierce MSA	21	6.84	0.00	0.00	5.01	0.00	54.31	52.38	40.68	47.62	0.31	0.00	0.00	0.35	0.30	

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						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:																
Naples MSA	14	70.00	1.18	0.00	7.73	0.00	57.92	57.14	33.17	42.86	1.45	0.00	0.00	1.40	1.79	
Limited Review:																
Ft. Pierce MSA	6	30.00	0.00	0.00	5.01	16.67	54.31	66.67	40.68	16.67	1.45	0.00	11.11	1.62	0.66	

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
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:															
Naples MSA	154	94.48	1.18	0.00	7.73	2.60	57.92	46.10	33.17	51.30	0.30	0.00	0.33	0.16	0.53
Limited Review:															
Ft. Pierce MSA	9	5.52	0.00	0.00	5.01	11.11	54.31	55.56	40.68	33.33	0.06	0.00	0.00	0.06	0.06

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															
Geography: FLORIDA															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples MSA	0	0.00	1.80	0.00	2.10	0.00	41.08	0.00	55.03	0.00	0.00	0.00	0.00	0.00	
Limited Review:															
Ft. Pierce MSA	0	0.00	0.00	0.00	7.91	0.00	51.33	0.00	40.76	0.00	0.00	0.00	0.00	0.00	

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: FLORIDA															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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:															
Naples MSA	74	89.16	1.43	1.35	3.92	1.35	57.32	55.41	37.33	41.89	0.21	0.00	0.00	0.23	0.23
Limited Review:															
Ft. Pierce MSA	9	10.84	0.00	0.00	21.25	66.67	39.86	33.33	38.89	0.00	0.06	0.00	0.20	0.05	0.00

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: FLORIDA															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples MSA	0	0.00	1.50	0.00	15.37	0.00	62.18	0.00	20.95	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Ft. Pierce MSA	0	0.00	0.00	0.00	11.81	0.00	48.56	0.00	39.63	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																								
Naples MSA	286	93.16	17.77	5.02	19.99	12.19	22.95	9.68	39.29	73.12	0.61	0.13	0.47	0.28	0.85									
Limited Review:																								
Ft. Pierce MSA	21	6.84	13.74	0.00	17.01	14.29	21.77	9.52	47.49	76.19	0.35	0.00	0.16	0.24	0.50									

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 2.28% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																
Geography: FLORIDA																
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002																
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****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
Full Review:																
Naples MSA	14	70.00	17.77	0.00	19.99	7.14	22.95	42.86	39.29	50.00	1.52	0.00	0.00	3.31	2.96	
Limited Review:																
Ft. Pierce MSA	6	30.00	13.74	0.00	17.01	16.67	21.77	33.33	47.49	50.00	1.49	0.00	0.00	2.53	1.73	

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 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: FLORIDA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					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:															
Naples MSA	154	94.48	17.77	7.48	19.99	16.33	22.95	10.88	39.29	65.31	0.35	0.13	0.55	0.04	0.45
Limited Review:															
Ft. Pierce MSA	9	5.52	13.74	0.00	17.01	11.11	21.77	11.11	47.49	77.78	0.07	0.00	0.21	0.00	0.06

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 4.29% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:									
Naples MSA	74	89.16	60.97	55.41	58.11	14.86	27.03	0.21	0.33
Limited Review:									
Ft. Pierce MSA	9	10.84	63.26	33.33	55.56	22.22	22.22	0.06	0.05

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 14.46% 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, 1999 TO DECEMBER 31, 2002									
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 \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Naples MSA	0	0.00	89.39	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Ft. Pierce MSA	0	0.00	91.08	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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: FLORIDA			Evaluation Period: JULY 1, 1999 TO DECEMBER 31, 2002				
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:									
Naples MSA	1	100	1	26	2	126	100.00	0	0
Limited Review:									
Ft. Pierce MSA	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: JULY 1, 1999 TO DECEMBER 31, 2002																	
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:																	
Naples MSA	86.32	2	66.67	0.00	0.00	50.00	50.00	0	0	0	0	0	0	5.23	10.56	59.09	25.11
Limited Review:																	
Ft. Pierce MSA	13.68	1	33.33	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	8.45	51.53	40.02

Table 1. Lending Volume

LENDING VOLUME												
Geography: INDIANA												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% 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 MSA	71.44	3,088	322,254	1,465	141,078	4	313	10	15,494	4,567	479,139	86.74
Limited Review:												
Lafayette MSA	28.56	1,695	201,776	126	14,850	1	160	0	0	1,822	216,786	13.26

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1999 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: INDIANA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						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 MSA	1,175	58.84	4.00	1.70	19.30	12.17	39.18	31.40	37.52	54.72	0.66	0.30	0.76	0.66	0.65	
Limited Review:																
Lafayette MSA	822	41.16	0.11	0.00	11.57	5.60	64.58	59.49	23.74	34.91	6.34	0.00	4.28	6.60	6.45	

* Based on 2001 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: INDIANA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis MSA	203	75.46	4.00	5.42	19.30	19.70	39.18	41.38	37.52	33.50	1.19	1.30	2.04	1.06	0.95									
Limited Review:																								
Lafayette MSA	66	24.54	0.11	0.00	11.57	15.15	64.58	68.18	23.74	16.67	2.26	0.00	3.70	2.46	1.53									

* Based on 2001 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: INDIANA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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 MSA	1,710	67.94	4.00	1.81	19.30	13.27	39.18	37.37	37.52	47.54	0.99	0.68	1.21	1.06	0.91									
Limited Review:																								
Lafayette MSA	807	32.06	0.11	0.00	11.57	6.94	64.58	62.21	23.74	30.73	5.92	0.00	4.49	6.10	5.99									

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															
Geography: INDIANA															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	0	0.00	8.15	0.00	23.22	0.00	46.93	0.00	21.71	0.00	0.00	0.00	0.00	0.00	
Limited Review:															
Lafayette MSA	0	0.00	10.79	0.00	42.97	0.00	15.58	0.00	30.07	0.00	0.00	0.00	0.00	0.00	

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: INDIANA															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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:															
Indianapolis MSA	1,465	92.08	8.09	7.30	15.75	15.22	34.08	29.90	41.94	47.58	1.10	1.80	1.16	0.89	1.29
Limited Review:															
Lafayette MSA	126	7.92	7.15	9.52	30.47	35.71	42.31	28.57	19.87	26.19	0.98	1.85	1.26	0.61	1.27

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: INDIANA															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	4	80.00	0.82	0.00	6.61	0.00	53.39	75.00	39.18	25.00	0.82	0.00	0.00	1.13	0.00
Limited Review:															
Lafayette MSA	1	20.00	1.12	0.00	5.84	0.00	73.71	100.00	19.33	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: INDIANA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																								
Indianapolis MSA	1,175	58.84	18.83	14.22	18.44	22.24	23.53	24.57	39.20	38.97	0.74	0.99	0.61	0.62	0.89									
Limited Review:																								
Lafayette MSA	822	41.16	17.17	6.63	18.43	18.77	24.69	29.20	39.71	45.40	7.26	3.97	5.30	6.06	10.89									

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 1.10% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: INDIANA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																								
Indianapolis MSA	203	75.46	18.83	17.24	18.44	31.53	23.53	18.72	39.20	32.51	1.23	1.69	1.58	0.84	1.05									
Limited Review:																								
Lafayette MSA	66	24.54	17.17	9.23	18.43	33.85	24.69	33.85	39.71	23.08	2.34	0.00	4.63	2.13	1.55									

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 0.37% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 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: INDIANA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																								
Indianapolis MSA	1,710	67.94	18.83	11.33	18.44	24.49	23.53	27.74	39.20	36.44	1.23	1.48	1.46	1.27	1.03									
Limited Review:																								
Lafayette MSA	807	32.06	17.17	8.07	18.43	21.22	24.69	26.69	39.71	44.01	6.91	9.68	7.57	6.18	6.65									

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 4.61% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: INDIANA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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 MSA	1,465	92.08	70.39	58.84	82.18	7.51	10.31	1.10	1.45
Limited Review:									
Lafayette MSA	126	7.92	75.19	66.67	75.40	11.90	12.70	0.98	0.99

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 10.25% 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: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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 \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Indianapolis MSA	4	80.00	94.44	75.00	75.00	25.00	0.00	0.82	0.95
Limited Review:									
Lafayette MSA	1	20.00	95.51	100.00	0.00	100.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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: INDIANA									
Evaluation Period: JULY 1, 1999 TO DECEMBER 31, 2002									
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 MSA	6	2,041	31	1,919	37	3,960	94.96	0	0
Limited Review:									
Lafayette MSA	1	2	5	208	6	210	5.04	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: JULY 1, 1999 TO DECEMBER 31, 2002																	
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 MSA	86.74	19	82.61	5.26	21.05	31.58	42.11	1	0	0	0	+ 1	0	6.53	23.00	38.91	31.56
Limited Review:																	
Lafayette MSA	13.26	4	17.39	25.00	0.00	50.00	25.00	0	0	0	0	0	0	3.08	24.49	47.00	20.13

Table 1. Lending Volume

LENDING VOLUME												
Geography: MICHIGAN												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% 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:												
Detroit MSA	21.01	3,491	424,254	3,353	286,800	1	10	11	52,555	6,856	763,619	43.89
Grand Rapids MSA	41.46	8,927	884,086	4,501	422,389	79	6,818	24	12,287	13,531	1,325,580	34.91
Limited Review:												
Benton Harbor MSA	0.97	149	8,558	162	10,117	5	432	1	15	317	19,122	.75
Kalamazoo MSA	1.72	277	26,338	284	18,794	1	20	3	425	565	45,577	1.07
Non Metropolitan Areas	34.84	8,113	760,033	3,164	202,472	75	3,518	12	2,223	11,364	968,246	19.38

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1999 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						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:																
Detroit MSA	986	16.84	8.43	0.61	13.24	7.81	45.66	50.51	32.67	40.97	0.24	0.05	0.24	0.23	0.29	
Grand Rapids MSA	2,674	45.68	2.53	1.53	11.79	10.32	64.86	65.11	20.82	23.04	2.84	2.07	3.04	2.91	2.61	
Limited Review:																
Benton Harbor MSA	20	0.34	0.00	0.00	7.23	25.00	85.73	60.00	7.04	15.00	0.39	0.00	1.59	0.30	0.00	
Kalamazoo MSA	121	2.07	4.07	3.31	7.80	9.09	40.72	39.67	47.41	47.93	0.43	0.00	0.55	0.67	0.27	
Non Metropolitan Areas	2,053	35.07	0.06	0.00	7.89	5.65	77.36	76.96	14.69	17.39	5.57	0.00	5.94	5.50	5.73	

* Based on 2001 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					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:															
Detroit MSA	559	22.40	8.43	3.22	13.24	13.95	45.66	53.67	32.67	29.16	0.53	0.21	0.56	0.64	0.40
Grand Rapids MSA	1,072	42.97	2.53	4.66	11.79	13.34	64.86	63.71	20.82	18.28	4.27	8.42	5.43	4.37	2.64
Limited Review:															
Benton Harbor MSA	44	1.76	0.00	0.00	7.23	20.45	85.73	65.91	7.04	13.64	6.36	0.00	16.67	5.46	5.26
Kalamazoo MSA	33	1.32	4.07	9.09	7.80	21.21	40.72	45.45	47.41	24.24	1.27	0.00	1.45	2.39	0.41
Non Metropolitan Areas	787	31.54	0.06	0.00	7.89	6.73	77.36	83.86	14.69	9.40	6.34	0.00	4.81	7.24	3.00

* Based on 2001 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: MICHIGAN															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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:															
Detroit MSA	1,945	15.43	8.43	1.13	13.24	5.96	45.66	42.98	32.67	49.92	0.20	0.05	0.18	0.19	0.23
Grand Rapids MSA	5,180	41.09	2.53	1.41	11.79	8.67	64.86	66.18	20.82	23.75	3.16	1.38	3.19	3.30	2.94
Limited Review:															
Benton Harbor MSA	85	0.67	0.00	0.00	7.23	29.41	85.73	60.00	7.04	10.59	1.13	0.00	3.45	0.99	0.75
Kalamazoo MSA	123	0.98	4.07	5.69	7.80	5.69	40.72	38.21	47.41	50.41	0.36	1.25	0.55	0.38	0.26
Non Metropolitan Areas	5,272	41.82	0.06	0.02	7.89	5.54	77.36	76.52	14.69	17.92	7.13	0.00	5.57	7.43	6.44

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															
Geography: MICHIGAN															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Grand Rapids MSA	1	33.33	5.64	0.00	12.40	0.00	67.97	100.00	13.99	0.00	2.50	0.00	0.00	4.55	0.00
Detroit MSA	1	33.33	18.55	0.00	14.57	0.00	43.74	100.00	23.13	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Non Metropolitan Areas	1	33.33	0.00	0.00	1.67	0.00	81.47	100.00	16.86	0.00	0.00	0.00	0.00	0.00	0.00
Kalamazoo MSA	0	0.00	11.66	0.00	24.82	0.00	28.15	0.00	35.30	0.00	0.00	0.00	0.00	0.00	0.00
Benton Harbor MSA	0	0.00	0.00	0.00	25.86	0.00	70.67	0.00	3.47	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: MICHIGAN															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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:															
Detroit MSA	3,353	29.25	6.55	4.33	11.25	14.23	42.60	45.81	39.42	35.63	0.85	0.87	1.14	0.88	0.79
Grand Rapids MSA	4,501	39.26	6.74	4.18	13.04	9.89	59.72	67.74	20.50	18.20	2.99	2.68	2.58	3.42	2.41
Limited Review:															
Benton Harbor MSA	162	1.41	0.00	0.00	14.80	25.31	80.06	62.35	5.14	12.35	0.62	0.00	1.85	0.62	0.27
Kalamazoo MSA	284	2.48	11.38	10.43	9.91	12.59	32.82	43.88	44.28	33.09	0.66	1.23	1.51	0.84	0.40
Non Metropolitan Areas	3,164	27.60	0.03	0.00	5.91	4.39	79.36	81.95	14.69	13.65	4.48	0.00	2.77	4.84	4.55

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: MICHIGAN															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Detroit MSA	1	0.62	2.10	0.00	8.09	0.00	50.89	0.00	38.93	100.00	0.00	0.00	0.00	0.00	0.00
Grand Rapids MSA	79	49.07	0.93	0.00	7.66	10.13	74.75	74.68	16.66	15.19	8.46	0.00	14.29	7.66	9.76
Limited Review:															
Benton Harbor MSA	5	3.11	0.00	0.00	1.87	0.00	88.79	20.00	9.35	80.00	2.74	0.00	0.00	1.61	9.09
Kalamazoo MSA	1	0.62	1.66	0.00	3.73	0.00	44.19	0.00	50.41	100.00	0.00	0.00	0.00	0.00	0.00
Non Metropolitan Areas	75	46.58	0.00	0.00	6.56	12.00	77.26	77.33	16.18	10.67	9.91	0.00	10.53	8.77	17.24

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Purchase 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:															
Detroit MSA	986	16.84	21.99	11.08	16.51	25.71	21.95	27.69	39.55	35.53	0.28	0.26	0.27	0.26	0.30
Grand Rapids MSA	2,674	45.68	17.73	14.82	18.32	25.14	26.77	28.46	37.18	31.58	3.20	3.72	3.05	3.05	3.26
Limited Review:															
Benton Harbor MSA	20	0.34	19.07	10.53	17.79	21.05	25.74	36.84	37.40	31.58	0.43	0.00	0.45	0.54	0.56
Kalamazoo MSA	121	2.07	17.94	7.50	15.27	39.17	22.09	20.00	44.70	33.33	0.50	1.02	0.95	0.16	0.40
Non Metropolitan Areas	2,053	35.07	18.80	6.72	18.53	20.30	22.73	25.77	39.94	47.21	6.15	8.67	7.29	5.50	5.81

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 2.10% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: MICHIGAN					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																								
Detroit MSA	559	22.40	21.99	18.28	16.51	22.94	21.95	29.39	39.55	29.39	0.54	0.62	0.56	0.57	0.42									
Grand Rapids MSA	1,072	42.97	17.73	14.53	18.32	27.65	26.77	30.83	37.18	26.99	4.32	5.71	5.56	3.82	3.23									
Limited Review:																								
Benton Harbor MSA	44	1.76	19.07	6.82	17.79	34.09	25.74	29.55	37.40	29.55	6.45	3.33	10.42	4.62	6.76									
Kalamazoo MSA	33	1.32	17.94	6.25	15.27	37.50	22.09	25.00	44.70	31.25	1.29	0.00	2.09	1.03	1.31									
Non Metropolitan Areas	787	31.54	18.80	9.66	18.53	21.73	22.73	26.18	39.94	42.44	6.42	9.41	7.06	3.73	7.25									

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 0.28% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 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: MICHIGAN					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Detroit MSA	1,945	15.43	21.99	11.03	16.51	23.35	21.95	26.97	39.55	38.65	0.23	0.28	0.25	0.23	0.21									
Grand Rapids MSA	5,180	41.09	17.73	11.45	18.32	25.56	26.77	30.56	37.18	32.44	3.66	4.32	3.77	3.55	3.50									
Limited Review:																								
Benton Harbor MSA	85	0.67	19.07	11.90	17.79	26.19	25.74	27.38	37.40	34.52	1.35	0.64	1.15	1.52	1.54									
Kalamazoo MSA	123	0.98	17.94	2.54	15.27	14.41	22.09	27.12	44.70	55.93	0.44	0.43	0.38	0.59	0.37									
Non Metropolitan Areas	5,272	41.82	18.80	6.17	18.53	19.38	22.73	26.59	39.94	47.86	7.73	9.02	9.28	8.14	6.99									

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 5.44% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MICHIGAN			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
MA/Assessment Area:	#	% 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:									
Detroit MSA	3,353	29.25	73.55	59.68	84.28	8.11	7.61	0.85	1.50
Grand Rapids MSA	4,501	39.26	77.45	62.41	80.18	11.29	8.53	2.99	3.85
Limited Review:									
Benton Harbor MSA	162	1.41	79.76	77.16	90.12	4.94	4.94	0.62	0.86
Kalamazoo MSA	284	2.48	79.13	66.90	89.79	6.34	3.87	0.66	1.18
Non Metropolitan Areas	3,164	27.60	80.69	74.53	87.58	7.71	4.71	4.48	6.81

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 8.71% 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: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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 \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Detroit MSA	1	0.62	91.75	100.00	100.00	0.00	0.00	0.00	0.00
Grand Rapids MSA	79	49.07	91.28	79.75	73.42	20.25	6.33	8.46	8.79
Limited Review:									
Benton Harbor MSA	5	3.11	93.46	100.00	80.00	0.00	20.00	2.74	3.39
Kalamazoo MSA	1	0.62	89.83	100.00	100.00	0.00	0.00	0.00	0.00
Non Metropolitan Areas	75	46.58	93.97	76.00	90.67	8.00	1.33	9.91	9.34

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 6.83% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MICHIGAN									
Evaluation Period: JULY 1, 1999 TO DECEMBER 31, 2002									
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:									
Detroit MSA	6	1,295	65	2,502	71	3,797	43.20	0	0
Grand Rapids MSA	4	2,197	108	1,046	112	3,243	36.98	0	0
Limited Review:									
Benton Harbor MSA	2	11	7	57	9	68	0.78	0	0
Kalamazoo MSA	2	20	16	127	18	147	1.68	0	0
Non Metropolitan Areas	11	148	70	1,367	81	1,515	17.27	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: JULY 1, 1999 TO DECEMBER 31, 2002																	
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:																	
Detroit MSA	43.89	40	33.33	0.00	12.50	47.50	40.00	1	0	0	0	+1	0	14.69	15.62	41.21	28.39
Grand Rapids MSA	34.91	42	35.00	7.14	11.91	57.14	23.81	1	5	+1	0	-3	-1	4.72	14.05	62.19	19.04
Limited Review:																	
Benton Harbor MSA	.75	1	0.83	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	10.06	83.58	6.36
Kalamazoo MSA	1.07	2	1.67	0.00	0.00	0.00	50.00	0	0	0	0	0	0	11.25	12.74	35.54	40.16
Non Metropolitan Areas	19.38	35	29.17	0.00	0.00	85.71	14.29	12	11	0	0	0	+1	0.06	7.13	77.87	14.68

Table 1. Lending Volume

LENDING VOLUME												
Geography: OHIO												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% 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 MSA	24.43	6,909	708,705	4,010	377,839	12	1,315	39	57,677	10,970	1,145,536	20.48
Columbus MSA	38.77	11,921	1,562,391	5,346	503,729	76	4,674	22	34,164	17,365	2,104,958	45.42
Limited Review:												
Akron MSA	4.39	1,212	122,599	750	76,678	4	559	3	5,490	1,969	205,326	3.65
Dayton MSA	6.43	1,730	140,815	1,100	103,119	46	3,823	13	3,647	2,889	251,404	6.40
Lima MSA	2.29	418	27,399	576	51,962	30	2,312	4	577	1,028	82,250	3.69
Mansfield MSA	1.06	271	15,150	191	19,640	11	1,476	6	6,269	479	42,535	0.54
Wadsworth - Cleveland MSA	0.42	89	6,317	97	10,472	1	50	1	124	188	16,963	1.17
Toledo MSA	9.53	2,740	231,554	1,344	118,991	181	11,221	9	1,602	4,274	363,368	8.08
Non Metropolitan Areas	12.68	2,762	195,743	2,341	196,139	569	39,366	16	9,787	5,688	441,035	10.57

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1999 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OHIO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						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 MSA	2,898	26.33	5.71	3.07	9.94	7.73	50.17	50.76	34.17	38.20	2.72	2.03	2.53	3.09	2.40	
Columbus MSA	4,898	44.51	3.86	2.78	16.17	7.53	46.14	40.98	33.84	48.61	2.95	2.66	1.98	2.91	3.24	
Limited Review:																
Akron MSA	403	3.66	0.00	0.00	1.58	1.24	65.44	59.31	32.98	39.45	1.69	0.00	0.00	1.78	1.61	
Dayton MSA	558	5.07	4.80	2.87	12.72	8.96	54.18	52.69	28.30	35.48	0.94	0.86	0.93	1.02	0.86	
Lima MSA	107	0.97	3.77	2.80	12.19	5.61	65.85	63.55	18.19	28.04	1.60	0.00	0.00	1.90	1.65	
Mansfield MSA	81	0.74	1.48	0.00	11.76	6.17	50.34	43.21	36.42	50.62	0.99	0.00	0.00	0.72	1.52	
Wadsworth - Cleveland MSA	13	0.12	0.00	0.00	0.00	0.00	68.51	46.15	31.49	53.85	0.18	0.00	0.00	0.00	0.70	
Toledo MSA	1,161	10.55	3.90	2.33	16.10	12.40	55.12	52.54	24.89	32.73	3.00	2.52	2.80	3.03	3.07	
Non Metropolitan Areas	886	8.05	0.00	0.00	16.79	18.28	63.69	62.08	19.52	19.64	4.17	0.00	6.33	4.78	1.97	

* Based on 2001 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: OHIO															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	1,194	26.84	5.71	7.37	9.94	11.98	50.17	55.61	34.17	24.96	3.85	3.78	4.27	3.70	3.95
Columbus MSA	1,297	29.16	3.86	5.17	16.17	14.88	46.14	48.50	33.84	31.46	6.48	4.67	6.42	6.50	6.66
Limited Review:															
Akron MSA	274	6.16	0.00	0.00	1.58	4.01	65.44	75.18	32.98	20.80	7.11	0.00	23.81	7.19	5.36
Dayton MSA	299	6.72	4.80	3.68	12.72	12.71	54.18	61.87	28.30	21.74	2.06	1.94	2.80	1.72	2.47
Lima MSA	111	2.50	3.77	5.41	12.19	21.62	65.85	55.86	18.19	17.12	8.08	27.27	17.14	6.44	5.45
Mansfield MSA	97	2.18	1.48	0.00	11.76	17.53	50.34	43.30	36.42	39.18	4.73	0.00	4.48	4.21	5.93
Wadsworth - Cleveland MSA	29	0.65	0.00	0.00	0.00	0.00	68.51	75.86	31.49	24.14	7.58	0.00	0.00	10.64	0.00
Toledo MSA	440	9.89	3.90	7.73	16.10	26.14	55.12	49.55	24.89	16.59	5.19	8.54	5.06	5.53	3.47
Non Metropolitan Areas	707	15.89	0.00	0.00	16.79	28.57	63.69	58.27	19.52	13.15	14.49	0.00	25.29	14.29	6.42

* Based on 2001 Peer Mortgage Data: Central Region.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: OHIO		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																					
Cleveland MSA	2,816	22.37	5.71	2.56	9.94	6.85	50.17	46.56	34.17	43.96	1.63	0.84	1.09	1.72	1.77						
Columbus MSA	5,723	45.46	3.86	3.06	16.17	9.38	46.14	35.21	33.84	52.33	3.11	3.70	3.03	2.79	3.39						
Limited Review:																					
Akron MSA	535	4.25	0.00	0.00	1.58	1.12	65.44	67.66	32.98	31.21	1.38	0.00	0.88	1.61	1.02						
Dayton MSA	871	6.92	4.80	3.56	12.72	7.92	54.18	55.68	28.30	32.84	0.88	0.73	0.83	1.04	0.68						
Lima MSA	199	1.58	3.77	0.50	12.19	15.08	65.85	54.77	18.19	29.65	2.33	0.86	2.50	2.33	2.47						
Mansfield MSA	93	0.74	1.48	3.23	11.76	9.68	50.34	44.09	36.42	43.01	0.77	0.00	1.12	0.86	0.60						
Wadsworth - Cleveland MSA	47	0.37	0.00	0.00	0.00	0.00	68.51	61.70	31.49	38.30	1.64	0.00	0.00	1.23	2.85						
Toledo MSA	1,137	9.03	3.90	1.93	16.10	9.94	55.12	52.15	24.89	35.97	1.69	2.26	1.57	1.64	1.80						
Non Metropolitan Areas	1,168	9.28	0.00	0.00	16.79	13.96	63.69	58.90	19.52	27.14	3.07	0.00	3.20	3.04	3.07						

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															
Geography: OHIO															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Columbus MSA	3	30.00	16.73	0.00	24.89	100.00	36.80	0.00	21.58	0.00	1.06	0.00	4.35	0.00	0.00
Cleveland MSA -	1	10.00	17.70	100.00	11.76	0.00	48.27	0.00	22.18	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Akron MSA	0	0.00	0.00	0.00	1.24	0.00	80.19	0.00	18.56	0.00	0.00	0.00	0.00	0.00	0.00
Dayton MSA	2	20.00	13.10	0.00	20.01	0.00	46.07	100.00	20.83	0.00	1.96	0.00	0.00	4.55	0.00
Lima MSA	1	10.00	20.86	0.00	15.48	0.00	53.37	100.00	10.29	0.00	4.17	0.00	0.00	9.09	0.00
Mansfield MSA	0	0.00	4.73	0.00	8.61	0.00	62.60	0.00	24.06	0.00	0.00	0.00	0.00	0.00	0.00
Wadsworth - Cleveland MSA	0	0.00	0.00	0.00	0.00	0.00	82.88	0.00	17.12	0.00	0.00	0.00	0.00	0.00	0.00
Toledo MSA	2	20.00	10.36	0.00	20.31	0.00	49.42	100.00	19.66	0.00	1.68	0.00	0.00	3.03	0.00
Non Metropolitan Areas	1	10.00	0.00	0.00	10.82	0.00	70.97	100.00	18.22	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANSTO BUSINESSES															
Geography: OHIO															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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:															
Cleveland MSA	4,010	25.45	8.35	7.03	8.70	7.47	41.42	42.23	37.68	43.26	1.98	2.17	1.68	1.97	2.12
Columbus MSA	5,346	33.93	7.66	7.92	14.56	12.09	39.18	38.56	36.99	41.43	4.05	4.42	3.32	4.27	4.25
Limited Review:															
Akron MSA	750	4.76	0.00	0.00	1.58	1.47	61.48	74.27	36.94	24.27	1.66	2.27	0.66	2.16	1.21
Dayton MSA	1,100	6.98	10.57	11.73	14.32	14.73	44.40	49.00	30.70	24.55	1.39	1.55	1.58	1.50	1.25
Lima MSA	576	3.66	12.50	9.38	12.12	19.10	56.98	53.65	18.40	17.88	8.19	11.11	16.29	6.68	7.82
Mansfield MSA	191	1.21	6.35	6.81	15.13	20.42	48.49	35.60	30.03	37.17	1.72	2.92	1.16	1.89	1.67
Wadsworth - Cleveland MSA	97	0.62	0.00	0.00	0.00	0.00	74.39	91.75	25.61	8.25	2.36	0.00	0.00	3.66	1.21
Toledo MSA	1,344	8.53	9.73	4.76	12.40	12.72	48.76	50.67	28.84	31.85	2.72	2.04	2.38	2.97	2.96
Non Metropolitan Areas	2,341	14.86	0.00	0.00	14.00	12.17	67.82	70.70	18.18	17.13	7.06	0.00	9.42	7.26	7.23

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: OHIO															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	12	1.29	2.24	0.00	5.08	0.00	46.99	58.33	45.46	41.67	4.35	0.00	0.00	8.33	0.00
Columbus MSA	76	8.17	1.41	0.00	6.81	2.63	62.33	75.00	29.35	22.37	9.95	0.00	25.00	8.20	18.75
Limited Review:															
Akron MSA	4	0.43	0.00	0.00	0.52	0.00	69.72	100.00	29.76	0.00	5.26	0.00	0.00	7.14	0.00
Dayton MSA	46	4.95	1.67	0.00	9.27	19.57	63.49	60.87	25.48	19.57	7.57	0.00	12.00	6.28	12.00
Lima MSA	30	3.23	1.41	0.00	2.42	0.00	87.70	100.00	8.47	0.00	4.63	0.00	0.00	5.38	0.00
Mansfield MSA	11	1.18	0.25	0.00	3.23	36.36	55.58	45.45	40.94	18.18	14.71	0.00	50.00	13.04	11.11
Wadsworth - Cleveland MSA	1	0.11	0.00	0.00	0.00	0.00	83.33	100.00	16.67	0.00	10.00	0.00	0.00	20.00	0.00
Toledo MSA	181	19.46	1.18	0.00	5.11	1.66	75.64	94.48	18.07	3.87	32.97	0.00	66.67	33.94	17.65
Non Metropolitan Areas	569	61.18	0.00	0.00	8.07	7.56	66.19	72.06	25.74	20.39	43.44	0.00	95.24	38.96	51.32

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: OHIO					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																								
Cleveland MSA	2,898	26.33	19.90	7.41	16.93	27.96	23.60	29.31	39.58	35.33	3.18	2.70	3.41	3.31	3.03									
Columbus MSA	4,898	44.51	18.93	10.24	17.87	27.08	24.56	23.87	38.64	38.82	3.29	3.95	3.31	2.55	3.72									
Limited Review:																								
Akron MSA	403	3.66	13.20	5.71	15.83	16.88	24.62	24.94	46.34	52.47	1.83	1.90	1.84	1.83	1.83									
Dayton MSA	558	5.07	19.77	14.50	17.52	26.39	23.91	25.09	38.80	34.01	1.05	1.21	1.01	0.84	1.22									
Lima MSA	107	0.97	20.72	20.95	18.70	28.57	23.46	22.86	37.12	27.62	1.74	2.69	1.46	1.33	2.00									
Mansfield MSA	81	0.74	17.79	8.75	17.83	25.00	24.33	21.25	40.05	45.00	1.08	0.56	0.65	0.88	1.69									
Wadsworth - Cleveland MSA	13	0.12	15.02	7.69	17.26	7.69	26.79	23.08	40.93	61.54	0.21	0.00	0.00	0.00	0.49									
Toledo MSA	1,161	10.55	21.19	12.75	17.19	25.68	22.90	29.26	38.72	32.31	3.31	2.98	3.56	3.78	2.86									
Non Metropolitan Areas	886	8.05	18.28	7.68	18.01	25.15	23.89	32.48	39.83	34.69	4.43	5.83	4.95	4.13	4.12									

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 3.30% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: OHIO					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																								
Cleveland MSA	1,194	26.84	19.90	13.60	16.93	25.02	23.60	28.97	39.58	32.41	3.91	2.74	4.58	3.87	3.98									
Columbus MSA	1,297	29.16	18.93	13.07	17.87	21.73	24.56	28.66	38.64	36.54	6.43	9.36	6.18	6.61	5.47									
Limited Review:																								
Akron MSA	274	6.16	13.20	12.04	15.83	27.74	24.62	27.01	46.34	33.21	7.26	13.16	10.23	6.22	5.31									
Dayton MSA	299	6.72	19.77	17.79	17.52	25.84	23.91	28.19	38.80	28.19	2.10	2.83	2.08	1.85	1.96									
Lima MSA	111	2.50	20.72	25.23	18.70	31.53	23.46	21.62	37.12	21.62	8.46	21.15	9.33	4.49	4.85									
Mansfield MSA	97	2.18	17.79	7.22	17.83	17.53	24.33	29.90	40.05	45.36	4.81	3.57	2.35	6.72	5.19									
Wadsworth - Cleveland MSA	29	0.65	15.02	17.24	17.26	34.48	26.79	24.14	40.93	24.14	7.58	14.29	11.11	9.09	3.57									
Toledo MSA	440	9.89	21.19	23.18	17.19	25.00	22.90	24.32	38.72	27.50	5.31	6.17	7.11	3.88	4.78									
Non Metropolitan Areas	707	15.89	18.28	13.62	18.01	19.29	23.89	31.77	39.83	35.32	14.59	22.33	12.74	14.69	13.47									

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 0.74% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 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, 1999 TO DECEMBER 31, 2002				
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:																								
Cleveland MSA	2,816	22.37	19.90	7.05	16.93	21.65	23.60	26.45	39.58	44.85	1.70	0.97	1.66	1.58	1.99									
Columbus MSA	5,723	45.46	18.93	8.38	17.87	17.01	24.56	22.21	38.64	52.40	3.54	3.23	2.86	2.97	4.26									
Limited Review:																								
Akron MSA	535	4.25	13.20	4.85	15.83	16.31	24.62	23.11	46.34	55.73	1.49	1.30	1.33	1.31	1.65									
Dayton MSA	871	6.92	19.77	13.02	17.52	23.48	23.91	25.43	38.80	38.08	1.02	1.27	1.09	1.01	0.92									
Lima MSA	199	1.58	20.72	10.20	18.70	18.37	23.46	23.47	37.12	47.96	2.57	4.51	2.35	2.38	2.43									
Mansfield MSA	93	0.74	17.79	10.99	17.83	23.08	24.33	26.37	40.05	39.56	0.83	1.43	1.04	1.02	0.47									
Wadsworth - Cleveland MSA	47	0.37	15.02	17.39	17.26	26.09	26.79	26.09	40.93	30.43	1.88	5.80	1.72	2.27	0.87									
Toledo MSA	1,137	9.03	21.19	11.13	17.19	20.84	22.90	27.07	38.72	40.96	1.91	2.29	1.87	1.74	1.98									
Non Metropolitan Areas	1,168	9.28	18.28	6.43	18.01	19.91	23.89	27.77	39.83	45.89	3.34	4.14	3.73	3.30	3.14									

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 6.70% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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 MSA	4,010	25.45	76.72	59.75	82.19	8.10	9.70	1.98	2.95	
Columbus MSA	5,346	33.93	77.32	57.05	82.14	8.53	9.33	4.05	5.68	
Limited Review:										
Akron MSA	750	4.76	76.56	63.07	77.07	12.67	10.27	1.66	2.64	
Dayton MSA	1,100	6.98	80.18	57.09	81.09	9.64	9.27	1.39	1.82	
Lima MSA	576	3.66	78.25	57.12	79.17	12.67	8.16	8.19	8.68	
Mansfield MSA	191	1.21	80.30	69.63	75.92	15.18	8.90	1.72	2.45	
Wadsworth - Cleveland MSA	97	0.62	78.04	60.82	77.32	13.40	9.28	2.36	3.39	
Toledo MSA	1,344	8.53	77.47	61.61	79.91	11.09	9.00	2.72	3.74	
Non Metropolitan Areas	2,341	14.86	79.83	69.29	80.48	12.26	7.26	7.06	9.87	

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 10.64% 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, 1999 TO DECEMBER 31, 2002									
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 \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Cleveland MSA	12	1.29	91.80	91.67	58.33	33.33	8.33	4.35	7.69
Columbus MSA	76	8.17	93.30	92.11	78.95	21.05	0.00	9.95	17.24
Limited Review:									
Akron MSA	4	0.43	92.39	100.00	50.00	25.00	25.00	5.26	7.14
Dayton MSA	46	4.95	95.32	95.65	69.57	26.09	4.35	7.57	7.92
Lima MSA	30	3.23	96.57	93.33	70.00	23.33	6.67	4.63	4.25
Mansfield MSA	11	1.18	96.28	72.73	45.45	36.36	18.18	14.71	12.90
Medina Co - Cleveland MSA	1	0.11	83.33	100.00	100.00	0.00	0.00	10.00	14.29
Toledo MSA	181	19.46	94.60	89.50	84.53	13.81	1.66	32.97	33.14
Non Metropolitan Areas	569	61.18	96.66	96.13	79.44	17.57	2.99	43.44	45.69

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 2.26% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: OHIO									
Evaluation Period: JULY 1, 1999 TO DECEMBER 31, 2002									
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 MSA	18	5,226	80	3,492	98	8,718	29.95	0	0
Columbus MSA	23	5,437	92	7,907	115	13,344	38.09	0	0
Limited Review:									
Akron MSA	11	1,830	13	986	24	2,816	8.31	0	0
Dayton MSA	14	2,018	90	711	104	2,729	7.91	0	0
Lima MSA	3	162	7	174	10	336	0.20	0	0
Mansfield MSA	4	344	8	336	12	680	1.52	0	0
Wadsworth - Cleveland MSA	1	2	0	0	1	2	0.01	0	0
Toledo MSA	9	1,382	34	665	43	2,047	5.34	0	0
Non Metropolitan Areas	23	2,760	62	1,136	85	3,896	8.68	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: JULY 1, 1999 TO DECEMBER 31, 2002																	
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 MSA	20.48	47*	29.01	8.51	12.77	38.30	36.17	5	2	+2	+2	0	-1	11.69	13.74	45.50	28.98
Columbus MSA	45.42	51	31.48	7.84	15.69	27.45	49.02	9	9	+1	-1	-3	+3	9.31	20.07	42.38	28.21
Limited Review:																	
Akron MSA	3.65	9	5.56	0.00	11.11	88.89	0.00	0	0	0	0	0	0	0.00	1.75	69.55	28.70
Dayton MSA	6.40	13	8.02	23.08	0.00	30.77	46.15	0	0	0	0	0	0	8.47	17.27	50.01	24.26
Lima MSA	3.69	4	2.47	0.00	50.00	25.00	25.00	0	1	0	0	-1	0	6.17	14.84	62.64	16.35
Mansfield MSA	0.54	1	0.62	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.30	13.90	50.74	33.07
Wadsworth - Cleveland MSA	1.17	1	0.62	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	72.43	27.57
Toledo MSA	8.08	17	10.49	11.76	23.53	23.53	41.18	0	0	0	0	0	0	7.02	19.63	50.39	21.59
Non Metropolitan Areas	10.57	18	11.73	0.00	5.26	84.21	10.53	0	5	0	0	-5	0	0.00	17.05	64.06	18.89

* Two branches in the Cleveland MSA AA are located in census tracts that are not classified as low-, moderate-, middle- or upper-income tracts

Table 1. Lending Volume

LENDING VOLUME												
Geography: WEST VIRGINIA												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% 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:												
North Central WV Non Metropolitan	36.70	2,109	132,381	675	67,576	7	503	8	4,441	2,799	204,901	47.08
Limited Review:												
Charleston MSA	31.70	1,617	152,617	794	82,146	0	0	10	2,747	2,421	237,510	23.99
Huntington MSA	9.76	541	32,169	200	27,790	1	30	1	38	743	60,027	7.81
Parkersburg MSA	5.47	315	16,794	101	12,275	0	0	1	350	417	29,419	5.75
Washington DC MSA	8.26	544	42,025	84	6,351	0	0	0	0	628	48,376	8.46
Non Metropolitan Areas	8.11	485	31,464	132	14,363	0	0	4	3,627	621	49,454	6.91

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1999 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						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:																
North Central WV Non Metropolitan Area	818	39.27	0.00	0.00	2.10	2.57	55.80	40.71	42.11	56.72	6.74	0.00	10.00	6.16	7.02	
Limited Review:																
Charleston MSA	656	31.49	0.14	0.15	17.47	11.28	57.99	54.57	24.40	33.99	5.31	0.00	5.60	6.06	4.32	
Huntington MSA	170	8.16	0.48	1.18	20.12	11.76	48.54	38.82	30.86	48.24	2.03	0.00	1.44	1.84	2.55	
Parkersburg MSA	108	5.18	0.00	0.00	17.39	9.26	64.58	63.89	18.03	26.85	2.09	0.00	2.58	1.41	3.34	
Washington DC MSA	166	7.97	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	2.20	0.00	2.20	0.00	0.00	
Non Metropolitan Areas	165	7.92	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	18.35	0.00	0.00	18.35	0.00	

* Based on 2001 Peer Mortgage Data: Southeast Region 2.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					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:															
North Central WV Non Metropolitan Area	470	43.20	0.00	0.00	2.10	2.77	55.80	57.87	42.11	39.36	19.81	0.00	33.33	20.46	18.00
Limited Review:															
Charleston MSA	182	16.73	0.14	0.00	17.47	22.53	57.99	60.44	24.40	17.03	4.31	0.00	8.33	4.05	2.63
Huntington MSA	157	14.43	0.48	1.27	20.12	17.83	48.54	57.96	30.86	22.93	9.42	25.00	10.00	10.58	6.45
Parkersburg MSA	117	10.75	0.00	0.00	17.39	21.37	64.58	64.10	18.03	14.53	7.72	0.00	12.82	6.97	7.04
Washington DC MSA	95	8.73	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	9.51	0.00	9.51	0.00	0.00
Non Metropolitan Areas	67	6.16	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	27.87	0.00	0.00	27.87	0.00

* Based on 2001 Peer Mortgage Data: Southeast Region 2.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						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:																
North Central WV Non Metropolitan Area	817	33.55	0.00	0.00	2.10	1.47	55.80	41.00	42.11	57.53	7.36	0.00	7.00	6.69	7.95	
Limited Review:																
Charleston MSA	779	31.99	0.14	0.00	17.47	10.01	57.99	55.97	24.40	34.02	5.05	0.00	4.60	5.26	4.87	
Huntington MSA	214	8.79	0.48	0.00	20.12	6.54	48.54	59.35	30.86	34.11	2.14	0.00	0.44	3.25	1.40	
Parkersburg MSA	90	3.70	0.00	0.00	17.39	8.89	64.58	70.00	18.03	21.11	1.28	0.00	1.18	1.53	0.78	
Washington DC MSA	282	11.58	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	4.50	0.00	4.50	0.00	0.00	
Non Metropolitan Areas	253	10.39	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	20.92	0.00	0.00	20.92	0.00	

* Based on 2001 Peer Mortgage Data: Southeast Region 2.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
North Central WV Non Metropolitan Area	4	80.00	0.00	0.00	6.83	0.00	52.69	0.00	40.48	100.00	3.57	0.00	0.00	0.00	8.33	
Limited Review:																
Charleston MSA	0	0.00	7.87	0.00	13.64	0.00	59.09	0.00	19.40	0.00	0.00	0.00	0.00	0.00	0.00	
Huntington MSA	0	0.00	21.15	0.00	21.07	0.00	25.04	0.00	32.74	0.00	0.00	0.00	0.00	0.00	0.00	
Parkersburg MSA	0	0.00	0.00	0.00	25.92	0.00	52.44	0.00	21.64	0.00	0.00	0.00	0.00	0.00	0.00	
Washington DC MSA	1	20.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	14.29	0.00	14.29	0.00	0.00	
Non Metropolitan Areas	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 2001 Peer Mortgage Data: Southeast Region 2.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
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:																
North Central WV Non Metropolitan Area	675	33.99	0.00	0.00	7.27	5.04	51.89	45.63	40.85	49.33	3.19	0.00	1.55	4.01	3.19	
Limited Review:																
Charleston MSA	794	39.98	13.68	10.20	17.18	39.04	46.16	37.41	22.98	13.35	5.20	7.23	14.54	4.06	2.51	
Huntington MSA	200	10.07	17.20	20.50	17.74	15.00	40.01	44.00	25.04	20.50	2.24	1.69	1.97	2.03	3.62	
Parkersburg MSA	101	5.09	0.00	0.00	34.01	22.77	51.83	55.45	14.16	21.78	1.55	0.00	1.18	1.91	1.58	
Washington DC MSA	84	4.23	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	1.65	0.00	1.81	0.00	0.00	
Non Metropolitan Areas	132	6.65	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	9.50	0.00	0.00	11.02	0.00	

* Based on 2001 Peer Small Business Data: US&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 (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					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:																
North Central WV Non Metropolitan Area	7	87.50	0.00	0.00	5.91	0.00	52.74	57.14	41.35	42.86	29.41	0.00	0.00	18.18	50.00	
Limited Review:																
Charleston MSA	0	0.00	0.84	0.00	17.15	0.00	61.09	0.00	20.92	0.00	0.00	0.00	0.00	0.00	0.00	
Huntington MSA	1	12.50	0.80	0.00	20.88	100.00	62.65	0.00	15.66	0.00	0.00	0.00	0.00	0.00	0.00	
Parkersburg MSA	0	0.00	0.00	0.00	27.57	0.00	62.16	0.00	10.27	0.00	0.00	0.00	0.00	0.00	0.00	
Washington DC MSA	0	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Non Metropolitan Areas	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 2001 Peer Small Business Data: US&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 (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Purchase 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:																
North Central WV Non Metropolitan Area	818	39.27	17.75	3.09	14.45	12.96	18.90	25.56	48.91	58.40	7.47	12.20	12.38	6.54	6.90	
Limited Review:																
Charleston MSA	656	31.49	21.16	11.06	18.37	21.81	21.00	25.96	39.47	41.17	5.88	6.83	5.62	5.70	5.91	
Huntington MSA	170	8.16	22.92	12.43	16.64	18.34	18.77	24.26	41.68	44.97	2.22	3.95	3.02	1.16	2.25	
Parkersburg MSA	108	5.18	21.18	10.19	17.46	28.70	22.47	20.37	38.89	40.74	2.43	4.40	2.91	2.36	1.83	
Washington DC MSA	166	7.97	38.10	38.55	32.67	40.36	19.02	16.27	10.21	4.82	2.71	3.05	2.95	2.33	1.31	
Non Metropolitan Areas	165	7.92	21.68	4.35	19.16	11.80	22.47	24.84	36.70	59.01	19.70	22.22	11.11	18.97	22.02	

* Based on 2001 Peer Mortgage Data: Southeast Region 2.

** As a percentage of loans with borrower income information available. No information was available for 0.86% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:																								
North Central WV Non Metropolitan Area	470	43.20	17.75	10.66	14.45	27.51	18.90	19.83	48.91	42.00	20.40	37.04	30.39	20.37	14.83									
Limited Review:																								
Charleston MSA	182	16.73	21.16	19.34	18.37	23.76	21.00	22.10	39.47	34.81	4.36	5.31	6.51	2.45	3.76									
Huntington MSA	157	14.43	22.92	8.92	16.64	22.93	18.77	31.85	41.68	36.31	9.57	8.93	14.29	11.22	6.70									
Parkersburg MSA	117	10.75	21.18	18.80	17.46	37.61	22.47	23.93	38.89	19.66	7.84	13.51	13.04	7.45	2.83									
Washington DC MSA	95	8.73	38.10	41.05	32.67	38.95	19.02	15.79	10.21	4.21	11.36	9.17	14.08	17.39	5.88									
Non Metropolitan Area	67	6.16	21.68	19.40	19.16	22.39	22.47	25.37	36.70	32.84	29.31	37.50	10.00	25.00	37.50									

* Based on 2001 Peer Mortgage Data: Southeast Region 2.

** As a percentage of loans with borrower income information available. No information was available for 0.18% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 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: WEST VIRGINIA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
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:																
North Central WV Non Metropolitan Area	817	33.55	17.75	3.86	14.45	10.57	18.90	20.52	48.91	65.05	8.34	12.35	9.58	9.59	7.69	
Limited Review:																
Charleston MSA	779	31.99	21.16	5.84	18.37	15.80	21.00	21.12	39.47	57.24	5.70	5.41	5.38	3.93	6.66	
Huntington MSA	214	8.79	22.92	3.86	16.64	15.94	18.77	21.26	41.68	58.94	2.31	0.00	2.76	2.21	2.47	
Parkersburg MSA	90	3.70	21.18	5.56	17.46	17.78	22.47	23.33	38.89	53.33	1.50	1.30	1.36	0.80	1.98	
Washington DC MSA	282	11.58	38.10	37.97	32.67	31.95	19.02	20.68	10.21	9.40	6.03	7.89	4.91	5.49	5.26	
Non Metropolitan Areas	253	10.39	21.68	3.25	19.16	9.35	22.47	23.58	36.70	63.82	23.05	12.50	18.37	22.62	24.76	

* Based on 2001 Peer Mortgage Data: Southeast Region 2.

** As a percentage of loans with borrower income information available. No information was available for 2.83% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WEST VIRGINIA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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:									
North Central WV Non Metropolitan Area	675	33.99	72.42	70.67	78.67	11.11	10.22	3.19	4.42
Limited Review:									
Charleston MSA	794	39.98	71.51	47.61	77.46	13.73	8.82	5.20	5.49
Huntington MSA	200	10.07	72.50	63.00	71.00	13.00	16.00	2.24	3.09
Parkersburg MSA	101	5.09	74.39	53.47	71.29	15.84	12.87	1.55	1.31
Washington DC MSA	84	4.23	77.65	71.43	84.52	10.71	4.76	1.65	2.85
Non Metropolitan Areas	132	6.65	73.04	71.97	76.52	10.61	12.88	9.50	19.21

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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 5.09% 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: WEST VIRGINIA									
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
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 \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
North Central WV Non Metropolitan Area	7	87.50	97.89	57.14	71.43	28.57	0.00	29.41	20.00
Limited Review:									
Charleston MSA	0	0.00	92.89	0.00	0.00	0.00	0.00	0.00	0.00
Huntington MSA	1	12.50	97.99	100.00	100.00	0.00	0.00	0.00	0.00
Parkersburg MSA	0	0.00	96.76	0.00	0.00	0.00	0.00	0.00	0.00
Washington DC MSA	0	0.00	96.35	0.00	0.00	0.00	0.00	0.00	0.00
Non Metropolitan Areas	0	0.00	93.55	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&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 - 2002).

**** 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: WEST VIRGINIA									
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
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:									
North Central WV Non Metropolitan Area	1	800	13	792	14	1,592	34.45	0	0
Limited Review:									
Charleston MSA	0	0	18	418	18	418	9.05	0	0
Huntington MSA	4	806	8	286	12	1,092	23.63	0	0
Parkersburg MSA	1	730	8	539	9	1,269	27.46	0	0
Washington DC MSA	0	0	8	199	8	199	4.31	0	0
Non Metropolitan Area	0	0	7	51	7	51	1.10	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: WEST VIRGINIA																	
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002																	
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:																	
North Central WV Non Metropolitan Area	47.08	17	48.57	0.00	11.76	47.06	41.18	0	1	0	0	-1	0	0.00	2.66	57.25	40.09
Limited Review:																	
Charleston MSA	23.99	8	22.86	25.00	37.50	25.00	12.50	0	0	0	0	0	0	0.82	19.09	57.57	22.51
Huntington MSA	7.81	2	5.71	50.00	0.00	50.00	0.00	0	0	0	0	0	0	4.02	21.87	45.36	28.75
Parkersburg MSA	5.75	1	2.86	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	19.29	64.11	16.60
Washington DC MSA	8.46	4	11.43	0.00	100.00	0.00	0.00	0	1	0	-1	0	0	0.00	100.00	0.00	0.00
Non Metropolitan Area	6.91	3	8.57	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00