



PUBLIC DISCLOSURE

June 17, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

FirstMerit Bank, N. A.
Charter Number: 14579

106 South Main Street
Akron, Ohio 44308

Office of the Comptroller of the Currency

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

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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 (LMI) neighborhoods, consistent with the 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 FirstMerit Bank N.A. issued by the OCC, the institution’s supervisory agency, for the evaluation period ending June 17, 2013. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Overall CRA Rating

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

The following table indicates the performance level of **FirstMerit Bank, N.A. (FM)** with respect to the Lending, Investment, and Service tests:

Performance Levels	FirstMerit Bank (FM) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- FirstMerit’s lending activity is good.
- Their geographic distribution of loans is adequate. Their distribution of loans by borrower income level is good.
- The level of community development (CD) lending had a neutral impact on the

Lending Test rating.

- The level of CD investments is adequate.
- The bank's retail delivery systems are accessible to all geographies and individuals of different income levels.

Definitions and Common Abbreviations

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

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

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

Census Tract (CT) – 2000 Census: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Census Tract (CT) – 2010 Census: Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

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

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

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-

- a. Rates of poverty, unemployment, and population loss; or
- b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

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

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

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

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

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

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

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

Median Family Income (MFI) – 2000 Census: The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Median Family Income (MFI) – 2010 Census: The median income derived from the United States Census Bureau's American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, the median is the point at which half of the families have income above it and half below it.

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

FirstMerit Bank (FM) is a \$25 billion interstate financial institution headquartered in Akron, Ohio. Based on asset size, FM is the 26th largest bank in the nation and one of the largest banks in the Midwest. FM operates in 12 assessment areas (AAs) located throughout Ohio, Pennsylvania, and Illinois. Northeast Ohio, including the Akron and Cleveland MSAs, is FM's primary operating market.

FM offers a wide variety of consumer and commercial banking products and services, as well as personal and corporate trust, personal financial services, cash management, and international banking services. The bank is primarily a retail lender as illustrated by their loan mix. As of March 31, 2013, FM's loan portfolio of \$9.4 billion was primarily comprised of real estate loans (51 percent), commercial loans (31 percent), consumer loans (16 percent), and other loans (2 percent). Commercial customers are primarily small and medium size businesses. Net loans represent 62.89 percent of average assets and Tier I capital is \$1.545 billion.

FM owns 21 subsidiaries including entities that provide equipment leasing, title services, life insurance, financial planning services, investment services and real estate holding. FM also owns a Community Development Corporation (CDC). The CDC's mission is to help revitalize low- and moderate-income areas and distressed and underserved communities through debt or equity investments, technical assistance, and products and services designed to promote community and economic development.

FM is wholly owned by FirstMerit Corporation (FMC), which is also headquartered in Akron, Ohio. FM represents 99 percent of the holding company's consolidated assets. In addition to FM, FMC has four other subsidiaries including an insurance company, two inactive corporations, and a company organized for tax purposes. Other than the CDC, the activities of FM's affiliates have no CRA impact.

FMC continues to expand into new markets through acquisitions. In 2010, FM entered the Chicago market with the purchase of \$1.2 billion in deposits and 24 Chicago-area branches from St. Louis-based First Bank. Expansion into Chicago continued that year with the acquisition of George Washington Savings Bank and Midwest Bank & Trust, both failed financial institutions. The CRA activities in Illinois are included in this Performance Evaluation (PE).

On April 12, 2013, FM finalized their acquisition of Citizens Republic Bancorp (Citizens) in Flint, Michigan. Citizens had 219 banking offices and assets of \$10 billion. With this acquisition, FM entered the Michigan and Wisconsin markets and strengthened their presence in northeast Ohio. Presently, FM has 415 banking offices and 452 Automated Teller Machines (ATMs) throughout Michigan, Wisconsin, Ohio, Pennsylvania, and Illinois. The CRA activities of Citizens were not included in this Performance Evaluation as the evaluation period for the Lending Test ended in 2012, which is prior to the bank's acquisition of Citizens.

FM offers several loan products that help meet the housing and small business lending needs in the community. The loan product, Best, was designed by FM to help meet the housing needs of low- and moderate-income (LMI) individuals. This flexible loan product is available to LMI individuals and promotes homeownership in targeted low- and moderate- income census tracts in the bank's AAs. FM made 94 loans totaling \$5.7 million under this program.

In addition, FM is an approved SBA lender and offers loans through the United States Department of Agriculture (USDA) Rural Development Loan Program. During this evaluation period, FM originated 58 loans totaling \$5.2 million under the USDA Rural Development Loan Program. The USDA flexible loan product provides 100 percent financing and the consumer must use the loan proceeds to build, renovate, or purchase a home in rural areas. Eligibility requirements include income restrictions, and the families must presently be without adequate housing.

The bank also originated 1,378 SBA loans totaling \$343 million. The SBA program provides a guarantee on a portion of the loan, which allows FirstMerit to lend to customers that traditionally do not qualify for conventional financing.

Multi-national banks and large regional financial institutions, such as Bank of America, PNC Bank, NA, KeyCorp, Huntington National Bank, Fifth Third Bank, First Midwest Bank, U.S. Bancorp, BMO Harris Bank, MB Financial, JPMorgan Chase, and Well Fargo provides strong competition in the major financial markets that FM has operations.

We did not identify any legal, financial, or other factors that impede the bank's ability to help meet the credit needs in its AAs. The bank received an Outstanding rating at the last CRA Examination, dated November 17, 2008.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FM qualifies as a large bank under the CRA regulation and is evaluated under the Lending, Investment, and Service Tests.

The scope of this evaluation includes all loans subject to reporting under the Home Mortgage Disclosure Act (HMDA) and all small loans to businesses and farms subject to reporting under CRA data collection. Community Development (CD) loans, investments, and services include all activities that meet the regulatory definition.

The evaluation period under the Lending Test includes all reportable loans originated or purchased from January 1, 2008 until December 31, 2012 (except Illinois). FM entered the state of Illinois in 2010, therefore the Lending Test for Illinois will include all loans originated and purchased from January 1, 2010 until December 31, 2012. We performed two separate lending analyses for each rating area for the Lending Test. Loans originated between January 1, 2008 and December 31, 2011 were analyzed using 2000 census data whereas loans originated from January 1, 2012 through December 31, 2012 were analyzed using 2010 census data.

The evaluation period for CD loans, investments, and the entire Service Test (both retail banking and CD services) for the states of Ohio and Pennsylvania includes all activities from November 17, 2008 through June 17, 2013. For the state of Illinois, the CD loan and Investment and Service Test evaluation period includes all activities from January 1, 2010 through June 17, 2013.

Data Integrity

The OCC verified the accuracy of the bank's loan data in November 2012. We reviewed a sample of HMDA and small loans to businesses and farms. We concluded that the data was accurate. This Performance Evaluation is based on accurate loan data

Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of assessment areas (AAs) in that state received a full-scope review. Refer to the "Scope" section under each state rating for details regarding how we selected the area for review and are representative of each rating area.

Ratings

The overall bank rating is a blend of all three state ratings. In arriving at the overall bank rating, the state of Ohio received the vast majority of the weight as 74 percent of the bank's deposits, 75 percent of its branches, and 90 percent of its lending activity is

in this state. The state of Illinois received the least weight of the three states as the activities for this state are for a shorter period than the other states.

The state ratings are primarily based on those areas that received full-scope reviews. Refer to the “Scope” section under each state for details regarding how the weights we assigned to arrive at the overall state rating.

Of the two analyses we performed of the bank’s lending performance, we assigned more weight to the bank’s 2008-2011 lending performance. This analysis period incorporates more of the bank’s lending activity and more accurately reflects their lending performance over the entire evaluation period.

During our analysis, we assigned equal weight to borrower and geographic distribution. We also assigned equal weight to the bank’s lending performance to low- and moderate-income geographies and/or individuals.

Geographic and borrower distribution conclusions for HMDA and small business loans provided the most weight in determining the overall Lending Test conclusions. While CD lending activity received lesser weight, we considered the volume and responsiveness of the activity. We also considered whether significant CD lending volume could influence the overall Lending Test rating.

In determining the conclusions for the Investment Test, we give the most weight to the dollar volume of the investment activity and its responsiveness in meeting the community’s credit needs. Finally, when determining the Service Test conclusions, we give the most weight to accessibility to branch offices and changes in branch locations. Branch hours and services as well as community development services received lesser amount s of weight.

Refer to the “Scope” section under each state rating for details regarding how we weighted the areas in arriving at the overall state rating.

Community Contacts

Community Affairs Officers from the OCC completed and/or updated community contacts in the full-scope AAs prior to the examination. They interviewed various community groups and organizations, including representatives from affordable housing organizations, Small Business Development centers and economic development organizations. Appendix C Market Profiles summarized the comments regarding these contacts for the full-scope areas.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank’s (bank) or Federal Savings Association’s (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by

the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance

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

Further, section 1025 of the Dodd–Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111-203) assigns to the CFPB exclusive examination authority, and primary enforcement authority, to ensure compliance by banks and FSAs with Federal consumer financial laws, if the bank or FSA has more than \$10 billion in assets. The CFPB has not provided the OCC with any information about, or other evidence of, discriminatory or other illegal credit practices relative to this institution with respect to the Federal consumer financial laws.

State Rating

State of Ohio

CRA Rating for Ohio: 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:

- FM's level of lending activity during this evaluation period is good.
- The geographic distribution of loans is adequate. The distribution of loans by borrower income level is good.
- An excellent level of CD loans was made in the Cleveland AA, having a significantly positive impact on the bank's performance under the Lending Test. In the Akron AA, the level of CD loans was good and has a positive impact. .
- The level of CD investments is adequate.
- The retail delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Description of Institution's Operations in Ohio

FM's primary operations are in the state of Ohio. Nine of the bank's 12 AAs are located in the state where the bank operates 143 banking offices and 165 ATMs. The state of Ohio represents 74 percent of FM's total deposit base, 75 percent of its branching network, and 90 percent of the lending activity during this evaluation period. FM has \$8.7 billion in deposits in this state.

Competition in the state is strong. Primary competitors include large multi-national and regional institutions, such as Wells Fargo, Bank of America, JPMorgan Chase, Fifth Third Bank, Huntington National Bank, and Howard Hanna Mortgage Services.

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

Scope of Evaluation in Ohio

We selected the Akron and Cleveland MSA AAs for full-scope reviews. The two AAs represent a significant majority of the bank's branching network, deposit base, and lending activity in the state.

In arriving at the overall state rating, the Akron and Cleveland AAs received equal weight. In terms of individual loan products, HMDA loans received more weight than small loans to businesses. We did not review small loans to farms or multifamily loans as FM made a nominal number of these loans during this evaluation period and the loan volume was insufficient to perform a meaningful analysis.

In terms of individual HMDA products, refinance loans received the most weight followed by home purchase loans. Home improvement loans received the least weight of the three products. This weighting is reflective of the bank's lending strategy and overall performance during this evaluation period. The bank's lending strategy does not hamper its ability to meet the credit needs within the bank's AAs.

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 Akron MSA and Cleveland MSA AAs is good.

Lending Activity

Refer to Tables 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.

Akron

FM's lending activity is good. During this evaluation period, FM made 6,806 HMDA loans and 1,994 small loans to businesses.

Based on 2011 HMDA peer data, FM is ranked 5th in home purchase loans (market share 5.78 percent), 1st in home improvement loans (market share 16.21 percent) and 2nd in refinance loans (market share 8.08 percent). There are 194 home purchase, 56 home improvement, and 232 refinance lenders.

2011 peer data showed that FM ranked 7th in making small loans to businesses in this AA with a market share of 4.59 percent. There were 61 lenders in the AA.

FM has a deposit market share in the Akron AA of 24.66 percent and is ranked 1st. There are 29 institutions with offices in this AA.

Cleveland

The bank's lending activity is good. During the evaluation period, FM made 9,312 HMDA loans and 2,984 small loans to businesses.

Based upon 2011 HMDA data, FM ranked 11th in home purchase loans (market share 2.75 percent), 10th in home improvement loans (market share 2.94 percent), and 5th in refinance loans (market share 4.67 percent). There are 258 home purchase lenders, 87 home improvement, and 317 refinance lenders in this AA. The bank is ranked 12th in making small loans to businesses in this AA with a market share of 2.09 percent. There are 95 lenders in the AA.

In the Cleveland AA, the bank was ranked 7th with a deposit market share of 6.11 percent. There are 44 institutions with offices in this AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is adequate. The geographic distribution of HMDA loans is adequate. The distribution of small loans to businesses is good. In assessing the overall performance, more weight was given to HMDA loans than to small loans to businesses.

Home Mortgage Loans

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

Overall, FM's geographic distribution of HMDA loans is adequate. Their geographic distribution of small loans to businesses is good.

Akron MSA AA

The geographic distribution of loans in the Akron MSA AA is good.

FM's geographic distribution of home purchase loans is good. The distribution of loans in low- and moderate-income CTs is near and exceeds the percentage of owner-occupied units, respectively. FM's market share in both low- and moderate-income tracts significantly exceeds their overall market share.

The distribution of home improvement loans is excellent. FM's distribution of loans and market share in both low- and moderate-income tracts significantly exceeds the demographic comparators.

The distribution of refinance loans is poor. The distribution of loans in low- and moderate-income tracts is significantly lower than the percentage of owner-occupied

units in these tracts, respectively. The bank's market share of loans in low-income tracts is significantly lower than their overall market share. However, the bank's market share in moderate-income tracts significantly exceeds their overall market share.

For 2012, FM's geographic distribution of home mortgage loans is good. The bank's distribution of home purchase and home improvement loans is good. In both low- and moderate-income tracts, the bank's distribution of home purchase loans is near the percentage of owner-occupied units in these geographies. The bank's percentage of home improvement loans in low-income tracts is near the percentage of owner-occupied units. In moderate-income tracts, the bank's distribution of loans exceeds the demographic comparators. The bank's distribution of refinance loans is adequate. The distribution of loans in both low- and moderate-income tracts is somewhat lower than the percentage of owner-occupied units in these areas.

Cleveland MSA AA

The geographic distribution of HMDA loans is poor. The distribution of home purchase loans in both low- and moderate-income CTs is significantly lower than the percentage of owner-occupied units in these tracts. FM's market share in low-income tracts is significantly lower than their overall market share. However, the bank's market share in moderate-income tracts is somewhat lower than their overall market share.

FM's distribution of home improvement loans is adequate. The distribution of home improvement loans in both low- and moderate-income tracts is somewhat lower than their respective comparators. This reflects adequate performance. The bank's market share of loans in both low- and moderate-income tracts is significantly lower than their overall market share.

The bank's distribution of refinance loans is very poor. Their distribution of refinance loans in both low and moderate-income CTs is significantly lower than the demographic comparators, which reflects very poor performance. FM made no loans in low-income CTs in 2011 however; their market share in moderate-income tracts is near their overall market share.

For 2012, FM's distribution of loans is adequate and stronger than their performance during the previous analysis period. The distribution of home purchase and home improvement loans is adequate. The distribution of home purchase loans in low- and moderate-income tracts is lower than and near the percentage of owner-occupied units in the area, respectively. The distribution of home improvement loans in low-income tracts exceeds the percentage of owner-occupied units. The percentage of home improvement loans in moderate-income tracts is near the demographic comparators. The bank's distribution of refinance loans is poor. The bank's geographic distribution of loans in both low- and moderate-income tracts is lower than the demographic comparators.

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 overall geographic distribution of small loans to businesses is good.

Akron MSA AA

In the Akron AA, the bank's geographic distribution of loans is excellent. The bank's distribution of loans in both low- and moderate-income tracts significantly exceeds the percentage of businesses in these tracts. Their market share in both low- and moderate-income tracts significantly exceeds their overall market share in all tracts.

For 2012, the bank's performance in the Akron AA is good. The bank's geographic distribution of loans is slightly weaker in moderate-income tracts but their performance in low-income tracts is consistent with the previous analysis period.

Cleveland MSA AA

In the Cleveland AA, the bank's geographic distribution of loans is poor. Their distribution of loans in both low- and moderate-income CTs is lower than the percentage of businesses in these tracts. Whereas, their market share in low-income tracts is somewhat lower than their market share in all tracts. The bank's market share in moderate-income tracts is near their overall market share.

For 2012, FM's geographic distribution of small loans to businesses is good and stronger than their performance during the previous analysis period. The bank's distribution of loans in the Cleveland AA is much stronger in both low- and moderate-income CTs.

Lending Gap Analysis

We reviewed maps and lending reports for the Akron and Cleveland AAs. There were no unexplained gaps in the bank's lending patterns in these AAs.

Inside/Outside Ratio

FM made a substantial majority of its loans inside their AAs. Overall, 95 percent of their loans (by number) were inside the bank's AAs. About 95 percent of HMDA loans and 93 percent of small loans to businesses were inside the bank's AAs.

By individual HMDA loan product, 93 percent of home purchase loans, 97 percent of home improvement loans, and 96 percent of refinance loans were inside the bank's AAs.

We made this assessment at the overall bank level rather than at the rating area or AA level.

Distribution of Loans by Income Level of the Borrower

The bank's overall distribution of loans by borrower income level is good. The distribution of HMDA loans is excellent and the distribution of small loans to businesses is adequate. In determining the overall conclusion, we assigned more weight to HMDA loans than small loans to businesses.

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.

Akron MSA AA

The borrower distribution of HMDA loans in the Akron MSA is excellent.

The distribution of home purchase loans is excellent. The bank's distribution of loans to both low- and moderate-income borrowers exceeds the percentages of low- and moderate-income families in the AA. FM's market share of home purchase loans exceeds their overall market share.

The bank's distribution of home improvement loans is also excellent. The bank's distribution of loans to both low- and moderate-income borrowers exceeds the demographic comparators. The bank's market share of loans to both low- and moderate-income borrowers also exceeds their overall market share.

The distribution of refinance loans is good. FM's distribution of loans to low-income borrowers is lower than the percentage of low-income families in the AA. However, the distribution of loans to moderate-income borrowers exceeds the demographic comparator. Furthermore, the bank's market share of loans to both low- and moderate-income borrowers exceeds their overall market share.

For 2012, the bank's distribution of loans is good. Their distribution of home purchase loans is good. The bank's distribution of loans to low- and moderate-income borrowers is near and exceeds the percentage of low- and moderate-income families in the AA, respectively. The bank's distribution of home improvement loans is excellent. Their distribution of loans to both low- and moderate-income borrowers exceeds the demographic comparators, respectively. The bank's distribution of refinance loans is good. Their distribution of loans to low-income borrowers is somewhat lower than the demographic comparators whereas their distribution of loans to moderate-income borrowers exceeds the comparator.

Cleveland MSA AA

The distribution of HMDA loans in the Cleveland MSA is excellent.

FM's distribution of home purchase loans is excellent. Their distribution of home purchase loans to low-income borrowers is near the percentage of low-income families in the AA. The bank's distribution of loans to moderate-income borrowers exceeds the demographic comparator. Their home purchase market share to low- and moderate-income borrowers exceeds and is near their overall market share, respectively.

The bank's distribution of home improvement loans is excellent. Their distribution of loans to low- and moderate-income borrowers is near and exceeds the comparators, respectively. Their home improvement market share to low-income borrowers exceeds their overall market share whereas their moderate-income market share is near their overall market share.

The bank's distribution of refinance loans is good. Their distribution of loans to low-income borrowers is lower than the demographic comparator. However, their distribution of loans to moderate-income borrowers exceeds the comparator. Their market share of refinance loans to both low- and moderate-income borrowers significantly exceeds their overall market share.

For 2012, FM's performance is good, but weaker than their 2008-2011 performance. Their distribution of both home purchase and home improvement loans is good. Their distribution of both home purchase and home improvement loans to low-income borrowers is near the percentage of low-income families in the AA. Their distribution of both loan products to moderate-income borrowers exceeds the demographic comparators. Their distribution of refinance loans is adequate. Their distribution of loans to low- and moderate-income borrowers is lower than and exceeds the demographic comparators, respectively.

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 distribution of small loans to businesses is adequate.

Akron

The bank's distribution of small loans to businesses is adequate. Their distribution of small loans to businesses (loans to businesses with gross annual revenues of \$1 million or less) is somewhat lower than the percentage of small businesses in the AA. However, the bank's small loan market share exceeds their overall market share.

For 2012, the bank's distribution of loans in the Akron AA is poor. Their distribution of small loans to businesses is lower than the percentage of small businesses in the AA.

Cleveland

The bank's distribution of small loans to businesses in the Cleveland AA is adequate. Their distribution of loans is somewhat lower than the percentage of small businesses in the AA. Whereas, their small loan market share exceeds their overall market of loans to all businesses.

For 2012, FM's distribution of small loans to businesses is poor. Their distribution of loans is lower than the percentage of small businesses in the AA..

Community Development Lending

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

Akron AA

CD lending is good and had a positive impact on the overall lending performance in this AA. During this evaluation period, FM made 36 CD loans in the Akron AA totaling \$38 million or 9.86 percent of allocated Tier 1 capital.

About 89 percent of the total dollar volume was affordable housing loans for low-and moderate-income families in the AA. While these loans were not innovative or flexible, affordable housing is an identified need in the community and these loans show good responsiveness to meeting this identified need in the AA.

Some specific examples of the bank's CD lending include:

- A \$7.6 million loan to finance the construction of a 60-unit Low-Income Housing Tax Credit (LIHTC) project. The facility will house individuals with serious and persistent mental illness, the homeless, and veterans and will use vouchers from the Akron Metropolitan Housing Authority's Housing Choice Voucher program.
- A \$4.9 million loan to finance the construction of 30 single-family homes in an urban renewal area located in a moderate-income CT. This is a LIHTC project.
- Two loans, totaling \$7.1 million, granted to construct and/or renovate two apartment complexes. These projects are supported by LIHTCs and provide 83 units of affordable housing for low-income seniors.

- A \$3.6 million loan to purchase and renovate a USDA Rural Development 515 project that provides housing for seniors. This project is supported by LIHTCs.

Cleveland MSA

FM's level of CD lending in this AA is excellent. During this evaluation period, FM made 38 qualified CD loans totaling \$89 million. The bank's CD lending activity had a significantly positive impact on the overall lending performance in the Cleveland AA and showed good responsiveness to meeting the identified credit needs in the AA. These loans were not considered innovative or flexible, but the lending activity did represent 21.85 percent of the AAs allocated Tier 1 capital.

Some examples of the CD lending in the Cleveland AA include:

- A \$15.6 million loan to refinance loans for several group homes that house developmentally- disabled individuals. These facilities primarily provide services to Medicaid patients.
- An \$8.4 million loan to revitalize and stabilize a low-income census tract in the City of Cleveland. The loan proceeds funded construction of a mixed-used development using New Market Tax Credits.

Product Innovation and Flexibility

As previously described, FM uses several flexible loan products to help meet the small business and housing needs of the community.

FM also participates in several flexible lending programs sponsored by Fannie Mae, the Small Business Administration, Federal Home Loan Bank of Cincinnati, the city of Cleveland, and the states of Illinois and Ohio. A brief summary of some of these programs and their benefits follow:

FM offers My Ohio and Home Path Mortgage loan programs through Fannie Mae. The products offer low down payment and flexible terms to assist individuals to purchase a home. FM originated 228 loans totaling \$16.8 million under the My Ohio program during the evaluation period and 325 loans totaling \$33.8 million under the Home Path Program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, FM's performance under the Lending Test in the Ashtabula County, Canton, Columbus, Non-MSA, Sandusky, and Toledo AAs is not inconsistent with the bank's overall High Satisfactory performance under the Lending Test in Ohio. In the Mansfield AA the bank's performance is slightly weaker than the bank's overall performance in the state as their geographic distribution of HMDA loans is weaker. FM's weaker performance in this AA did not have a negative impact on the overall Lending Test rating.

Refer to the Tables 1 through 11 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Ohio is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in both the Akron MSA and Cleveland MSA is adequate.

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

FM made several equity investments during this evaluation period in a nonprofit corporation based in Columbus, Ohio that works with private and public developers to create affordable housing opportunities throughout the state of Ohio. These investments allow the bank to take advantage of Low-Income Housing Tax Credits.

During this evaluation period, FM made a total commitment of \$27 million to five equity investment funds in the state. Each fund will develop several housing projects (primarily multi-family units) supported by LIHTCs. In addition, FM has \$1.7 million outstanding in projects from the prior evaluation period. We allocated the funds from each investment to the AAs based on the location of the project. Equity investments that funded projects not in the bank's AA are included in the statewide investments totals.

FirstMerit Community Development Corporation (FMCDC) also made investments in SBICs and provided financing to these organizations. These investments are qualified investments and are detailed under the regional investment total.

Akron

FM's level of investments in the Akron AA is adequate. During this evaluation period, FM made 192 qualified community development investments totaling \$7.41 million. This investment amount represents 1.93 percent of allocated Tier I capital.

In the Akron AA, the opportunity to make CD investments is good as we identified several CD organizations that operate in this AA. Affordable housing represents a prevalent need in this AA and 90 percent of FM's investments during this evaluation period helped to meet the affordable housing needs in this community. While these investments were not complex or innovative, FM showed an adequate responsiveness to meeting the identified needs.

When we considered the bank's current investment activities and their loans still outstanding in the Ohio AAs and the continuous positive impact of these loans, we consider the bank's investment activities in this AA adequate.

Specific examples of the bank's qualified CD investments include:

- FM has a \$6.66 million commitment in equity investments in 14 affordable housing projects. These projects will provide 635 housing units for LMI individuals in the AA.
- \$752 thousand in grants/donations to 178 qualified community development organizations. The vast majority of the grants were made to organizations that support community services targeted to low- and moderate-income individuals in the Akron MSA. Specific examples include grants made to food banks, clothing centers, and organizations that provide services to improve the welfare of low- and moderate-income individuals.

Cleveland

The bank's level of investments in the Cleveland AA is adequate. There are numerous opportunities to make qualified CD investments in this AA and during this evaluation period, FM investments totaled \$7.16 million. These investments were not innovative or complex but were directly responsive to identified needs in the community.

The total investment amount represents 1.76 percent of allocated Tier I capital. We also considered the outstanding investments from projects and Small Business Investment Company (SBIC) funds and the potential impact of statewide and regional investments on this AA, the bank's performance is considered adequate.

Details regarding these investments include:

- FM made a \$5.9 million commitment to help develop 13 affordable multi-family housing projects in this AA. The projects will provide 685 housing units for LMI individuals in the AA.

- Two certificate of deposits totaling \$350 thousand in a CDFI that operates in this AA.
- \$500 thousand commitment to an economic development organization that finances small businesses. The mission of this organization is to finance business development projects designed to become anchors that attract further development and improve the vitality of the region.
- FM made \$410 thousand in grants/donations to organizations that primarily provide affordable housing or community services, such as transitional housing, financial literacy, and after school day care services target to LMI individuals in the AA.

One particularly noteworthy donation of \$15 thousand was made to an organization that provides low-income teens with educational, vocational, and social competencies. The teens work from May through October at farms in low-income neighborhoods and earn money as they learn to plant, cultivate, harvest, and prepare to sell fruits, vegetables, and herbs. They donate any extra produce to food assistance programs for community residents in need.

Regional and statewide

The following investments are included in the statewide or regional totals. While these investments may not have a direct benefit to the bank's AAs, they may indirectly benefit the AAs, as the impacted areas are broader or regional areas that include the bank's AAs.

- A \$10 million commitment in three regional SBIC funds that provide mezzanine and junior capital financing to middle market companies throughout Ohio and the Chicago area. FM funded \$5 million during this evaluation period.
- FM made a \$260 thousand commitment to an Ohio non-profit to support an affordable housing project not located in the bank's AA.

FM has \$1.73 million investments supporting affordable housing projects throughout the state of Ohio that remain outstanding from the previous examination. The bank also has \$800 thousand in a SBIC fund that operates throughout Ohio and Illinois and \$143 thousand in two national residential equity funds that remain outstanding from the previous examination. These investments are regional or statewide investments that have a potential to benefit the bank's AAs.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Ashtabula County, Canton, Columbus, Mansfield, Non-MSA, Sandusky, and Toledo AAs is poor and weaker than their overall performance in the state. The investment amount in these AAs was less than the amount made in Akron or Cleveland. The

combined performance in the limited-scope AAs did not have a negative impact on the overall Investment test rating for Ohio.

Refer to the Table 12 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Ohio is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Akron MSA is excellent and their performance in the Cleveland MSA is good. Both AAs received equal weight to arrive at the overall state rating.

Retail Banking Services

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

FM provided retail banking services for the state of Ohio rating areas in a manner that reflects good responsiveness to the banking needs of geographies and borrowers of different income levels.

Akron

FM's retail delivery systems are readily accessible to all geographies and individuals including low- and moderate-income. The bank's branch distribution in the Akron MSA AA is excellent. The percentage of branches in both low- and moderate-income CTs exceed the percentage of the population living in these geographies. In addition, the bank has four branches in middle-income tracts that are near a moderate-income tract. FM also operates 37 ATMs in the Akron AA, of which, six are located in low-income tracts and eight are located in moderate-income tracts.

During the evaluation period, FM closed four banking offices and opened two in the Akron AA. Of the four closed offices, two were in moderate-income tracts, one in a low-income tract and one in an upper-income tract. These branch closings were a result of a reduction in business activity and lower profitability at these banking offices. FM opened offices in moderate and upper-income tracts. The branch closures generally did not adversely affect FM's ability to provide retail services in the AA.

FM's standard hours of operation are 8:30 a.m. until 6:00 p.m. Monday through Friday and Saturday 8:30 a.m. until 1:00 p.m. The banking hours in the low- and moderate-income geographies are consistent with the standard hours of operation and the hours offered in higher income-geographies.

Given the aggregate offering of products and services through reasonable banking hours for the 31 branches and 37 ATMs, the bank has continued to provide services responsive to the banking needs of the community.

Cleveland

The retail delivery systems in the Cleveland AA are accessible to all geographies and individuals including low- and moderate-income. The distribution of branches in low-income tracts is somewhat lower than the percentage of low-income population in the AA. However, in moderate-income tracts, the bank's percentage of branches exceeds the percentage of the population living in these tracts. In addition to the 53 branches in this AA, the bank has 66 ATMs in the AA with a good distribution in the low- and moderate-income geographies.

FirstMerit closed eight banking offices in the Cleveland AA during this evaluation period. The closing included three in upper-income tracts, four in middle-income, and one in a low-income tract. The branch closings generally did not adversely affect the accessibility of retail banking services to this AA. These branch closings were a result of a reduction in business activity and lower profitability at these banking offices that were proximate to other FM locations. No offices were opened in this AA during the evaluation period.

Overall, the bank has continued to provide services responsive to the banking needs of the community throughout the evaluation period.

The hours of operation and product/service offerings in the low- and moderate-income geographies are consistent with the standard hours of operation and the products/services offered in the middle- and upper-income geographies and generally do not vary in a way that inconveniences a particular geography.

Community Development Services

Akron

The level of CD services provided in this AA is adequate based on the opportunities available and demonstrates an adequate level of responsiveness to meeting the needs of the community. During this evaluation period, FM employees provided financial services to 19 community development organizations. Some specific examples are as follows:

- Serve on the strategic planning committee for a community service organization that provides food and other essential products to food pantries and shelters.
- Serve on the finance committee for an organization that assists start-up, small-, and medium-size business owners and contractors in developing business strategies, management practices and capital resources.

- Serve on the Board for an economic development finance company that provides financing options for growing small companies.
- Serve on the board for an organization that specializes in foreclosure prevention for low- and moderate-income individuals.

Cleveland

FM's level of CD services in the Cleveland AA is good and demonstrates a good responsiveness to meeting the needs in the community. During this evaluation period, employees provide financial services to 28 qualified community development organizations. The vast majority of these organizations provide community services to LMI individuals or families.

Some specific examples of these community development services include:

- Serve on the executive board for an organization that encourages the revitalization of Cleveland's neighborhoods through home purchase and improvement loans. The organization coordinates the funding for home repair, refinance, and home purchase loans.
- Serves as an instructor for homebuyer workshops for an organization that helps Spanish-speaking homebuyers with education related to housing, the GED, language skills, and work skills.
- Serve on the loan committee of a citywide development corporation. The loan committee must review and approve all loan requests made by the city and financed by the Economic Development Department.
- Serve on the board and development committee for an organization that provides college access through scholarships for the underserved.

Conclusions for Areas Receiving Limited-Scope Reviews

The bank's performance in the Canton, Non-MSA, Mansfield, and Toledo Ohio AAs is good and is not inconsistent with the overall "High Satisfactory" rating for the Service Test in Ohio. The bank's performance in the Ashtabula County, Columbus, and Sandusky AAs is weaker than the overall state performance, attributed to less accessible retail delivery systems. Due to their relative size and the difference of a few offices, the performance in these areas demonstrating weaker performance did not materially affect the overall service test conclusions for the state of Ohio.

Refer to Table 13 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

State Rating

State of Illinois

CRA Rating for Illinois: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is adequate. The distribution of loans by borrower income level is also adequate.
- An excellent level of CD loans made in the Chicago AA had a significantly positive impact on the overall Lending test rating.
- The level of CD investments is adequate.
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA including low- and moderate-income individuals and CTs.

Description of Institution's Operations in Illinois

In 2010, FM entered Illinois with the acquisition of three smaller financial institutions in the Chicago area. FM has a small presence in the state and has two designated AAs where they operate 44 banking offices and 42 ATMs. The state of Illinois represents 23 percent of FM's total deposit base, 23 percent of their branching network, and seven percent of their lending activity during this evaluation period. FM has \$2.7 billion in deposits in the state.

Within the state of IL, FM's primary market is the Chicago MSA AA. Of FM's total deposit base in the state, the Chicago AA has \$2.5 billion in deposits.

Competition in the state is strong. Primary competitors include large regional and multi-national institutions such as Wells Fargo, JPMorgan Chase, Bank of America, Huntington National Bank, and PNC Bank, NA.

Refer to the Market Profiles for the state of Illinois in appendix C for detailed demographics and other performance context information for the Chicago AA.

Scope of Evaluation in Illinois

We selected the Chicago MSA AA for a full-scope review. The Chicago AA represents 89 percent of FM's branching network, 92 percent of their deposits, and 92 percent of the bank's lending activity in the state. FM's performance in the Chicago AA drives the overall state rating. The Lake County AA received a limited-scope review.

Since FM entered the Illinois market in 2010, the lending analysis includes loan data from January 1, 2010 through December 31, 2012. We did not analyze home improvement loans, multifamily loans, or small loans to farms as the volume of these loan products was insufficient to perform meaningful analysis. We gave equal weight to HMDA and small loans to businesses. In terms of HMDA loans, we assigned more weight to refinance loans than home purchase loans. This weighting is reflective of the bank's overall lending activity during the evaluation period.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Illinois is rated High Satisfactory. The excellent CD lending activity in the Chicago AA had a significantly positive impact on the Lending Test rating. Based on a full-scope review, the bank's performance in the Chicago AA is good

In evaluating FM's lending activity and their distribution of loans, we also considered the bank's limited presence in this market as well as the strong competition provided by well-established banks in the market area.

Lending Activity

Refer to Table 1 Lending Volume in the state of Illinois section of appendix D for the facts and data used to evaluate the bank's lending activity. In arriving at the overall rating for the Lending Test, the excellent CD lending level had a significant positive impact on the bank's performance under the Lending Test

During this evaluation period, FM made 1,539 HMDA loans and 1,257 small loans to businesses in the Chicago AA. This lending activity shows adequate responsiveness to meeting the community's credit needs.

FM has a small presence in the Chicago MSA AA with a deposit market share of 0.91 percent and is ranked 16th among 249 institutions, based on 2012 FDIC deposit information. Based on 2011 peer mortgage data, FM has a 0.23 percent home purchase market share and is ranked 60th among 588 lenders. In terms of refinance loans, the bank has a 0.19 percent market share and is ranked 55th among 727 lenders. There are 193 lenders in the AA making small loans to businesses. FM is ranked 27th with a market share of 0.34 percent.

Distribution of Loans by Income Level of the Geography

The geographic distribution of both HMDA and small loans to businesses is adequate.

Home Mortgage Loans

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

The geographic distribution of home purchase loans is good. The bank's distribution of loans in low-income tracts exceeds the demographic comparator and the distribution of loans in moderate-income tracts is somewhat lower than the comparator. The bank's market share in low-income tracts exceeds the bank's overall market share. Their market share in moderate-income tracts is somewhat lower than their overall market share.

The geographic distribution of refinance loans is poor. FM's distribution of loans in low-income CTs is significantly lower than the demographic comparators. Distribution of lending in moderate-income CTs is lower than the demographic comparators. However, the bank's market share in low-income tracts is near their overall market share and their market share in moderate-income tracts exceeds their overall market share.

For 2012, FM's geographic distribution of home purchase and refinance loans is adequate and the bank's performance is not inconsistent with their performance during the previous analysis period.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is adequate. The distribution of loans in low-income tracts is significantly lower than the percentage of businesses in these tracts. However, the bank's distribution of loans in moderate-income tracts is near the demographic comparator. FM's market share in low-income tracts is near their overall market share of loans in all tracts. Their market share in moderate-income tracts exceeds their overall market share.

For 2012, FM's geographic distribution of small loans to businesses is good and stronger than their performance during the previous analysis period. In both low- and moderate-income CTs, their distribution of loans is near the demographic comparators.

Lending Gap Analysis

We reviewed maps and lending reports for the Chicago AA. We did not identify any unexplained gaps in the bank's lending patterns in this AA.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of loans by borrower income level is adequate. The distribution of HMDA loans is good. The distribution of small loans to businesses is poor. We assigned equal weight to both products to arrive at the overall conclusion.

Home Mortgage Loans

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

The borrower distribution of home purchase loans is excellent. The distribution of loans to both low- and moderate-income borrowers exceeds the demographic comparators. The bank's market share for home purchase lending to both low- and moderate-income borrowers exceeds their overall market share.

The distribution of refinance loans is adequate. The distribution of loans to low- and moderate-income borrowers is somewhat lower than and near the percentage of low- and moderate-income borrowers in the AA, respectively. However, their low-income market share exceeds their overall market share. Their moderate-income market share is somewhat lower than their overall market share.

For 2012, FM's distribution of loans is adequate. The distribution of both home purchase and refinance loans is adequate. We did not analyze home improvement loans, as the volume of loans made was insufficient to perform a meaningful analysis. Their distribution of home purchase loans to low- and moderate-income borrowers is somewhat lower than and exceeds the demographic comparators, respectively. Whereas, their distribution of refinance loans to low- and moderate-income borrowers is lower than and exceeds the demographic comparators, respectively.

Small Loans to Businesses

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

FM's distribution of loans to small businesses is poor. Their portion of loans to small businesses is significantly lower than the percentage of small businesses in the AA. However, the bank's small business market share is near their market share of loans to all businesses

For 2012, FM's distribution of loans to small businesses is also poor and consistent with their performance during the previous analysis period.

Community Development Lending

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

FM made 31 qualified CD loans in the Chicago AA totaling \$113 million. These loans represented 33.45 percent of allocated Tier 1 capital and showed an excellent responsiveness to meeting the identified needs in the community. The bank's CD lending activity had a significantly positive impact on the Lending Test. We do not consider these loans particularly innovative or flexible, but several met one of the identified needs in this AA, which is affordable housing.

The vast majority of the loans were renewals or refinance loans to community service organizations. Specific examples of the type of loans made during this evaluation period follows:

- Loans totaling \$97 million to nursing facilities to provide working capital line of credits. All the facilities primarily serve low- and moderate-income individuals.
- A \$6.6 million loan to finance the land purchase and construction of a 20-unit LIHTC project. All units are dedicated to low-income individuals.
- Two loans totaling \$5.4 million to construct a new building for a nonprofit organization that provides services and programs to individuals with mental disabilities, specifically autism. This project received New Market Tax Credits and is located in an area designated by the city of Chicago for redevelopment.
- Renewal of a \$4 million line of credit to a community investment corporation. The loan proceeds funded the corporation's mortgage loan program that provides acquisition, rehabilitation, refinancing, and construction loans for multifamily housing for LMI families in the AA.

Product Innovation and Flexibility

As described above, FM participates in several flexible lending programs sponsored by Fannie Mae, the Small Business Administration, Federal Home Loan Bank of Cincinnati, the city of Cleveland and the states of Illinois and Ohio.

FM also offers an affordable mortgage loan product, the Best program and recently began participating in the Illinois Collateral Enhancement Program (CEP). CEP provides private lending to help creditworthy small businesses that are having difficulty getting working capital needed to expand and create new jobs. FM recently closed its first loan under this program for \$412,500. The loan proceeds funded the purchase of a grocery store in Chicago. This loan helped to retain and/or create 90 full-time jobs in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Lake County AA is poor and weaker than the bank's overall High Satisfactory performance under the Lending Test in Illinois. The bank's geographic distribution of home purchase, refinance, and small business loans is overall weaker than their performance in the Chicago AA. The bank's performance in this AA did not have a negative impact on the overall state rating given its relative small size.

Refer to the Tables 1 through 11 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Illinois is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Chicago AA is adequate.

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

During this evaluation period, FM made 79 investments totaling \$7.15 million. This investment total represents 2.13 percent of allocated Tier 1 capital. While there are numerous opportunities to make investments in this AA, FM has only been in this market for a shorter time period compared to their presence in the other full-scope markets. Considering these factors, the bank's investment level reflects adequate responsiveness to meeting the identified needs in the AA. These investments are not innovative or complex.

Details regarding the bank's investments follows:

FM purchased a \$3 million general obligation school bond that provided working capital for a public high school in the city of Summit (Cook County). Fifty-nine percent of the student population qualifies for the free and reduced-priced lunch program. The bond proceeds funded building improvements and the technology and communication systems at the school.

FM also has a \$4 million commitment in a Community Investment Fund that operates in the Chicago area. The Community Investment Fund acts as a financial intermediary that helps channel bank investments into community development financial institutions.

FM also made 78 qualified grants or donations totaling \$150 thousand. These donations primarily provided funds to organizations that provide affordable housing or community services to low- and moderate-income individuals. Some specific examples include grants to organizations that provide shelter and housing programs, prevention of homelessness, homebuyer education, invest in neighborhood development, and small business lending.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Lake County AA is not inconsistent with their overall Low Satisfactory performance under the Investment Test in Illinois.

Refer to the Table 12 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Illinois is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Chicago MSA AA is adequate.

Retail Banking Services

The recent entry of FM into the Illinois market, along with consideration given to the longstanding presence of competitors, influenced our evaluation of the bank's Retail Banking Services.

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

Chicago AA

FM's retail delivery systems in this AA are reasonably accessible to geographies and individuals of different income levels, including low- and moderate-income. FM operates 39 branches and 37 ATMs in the Chicago AA. In low-income tracts, the percentage of bank branches is significantly lower than the percentage of the population in these tracts. However, in moderate-income tracts, the bank's distribution of branches is somewhat lower than the demographic comparator.

FM opened one banking office and closed eight banking offices in this AA during the evaluation period. All branch closings were in middle and upper-income CTs and the one branch opening was in an upper-income tract. Of the banking offices that FM closed, four were in close proximity to other FM locations because of the acquisition. In addition, three banking offices were Business Banking Centers where the business activity had declined. These changes in the branching network generally did not adversely affect the accessibility of delivery systems in the AA specifically to low- or moderate-income geographies.

The bank's hours of operation in the low- and moderate-income geographies are good and consistent with the standard hours of operation and those hours offered in higher income geographies. The hours of operation do not vary in a way that inconveniences individuals in the AA.

Community Development Services

Based on the number of organizations that benefitted and the numerous opportunities to provide CD services in this AA, FM's level of CD services is adequate.

During this evaluation period, bank employees provided qualified community development services to 15 community development organizations. The level of CD services showed adequate responsiveness to meeting the identified needs in the community. Employees served in the following capacities for organizations that provide community services or affordable housing to LMI individuals: board member, committee member, financial literacy advisory board member, fundraising committee member, tax preparer, and grant application reviewer. Some specific examples of the types of financial services provided include:

- Member of the Budget Assistance Advisory Board for an organization that provides financial, medical, and other community- related services to the very low-income, sometimes homeless, residents of DuPage County.
- Serve on the board for an economic development organization that provides small loans to small businesses up to \$50,000 for either startup or capital needs.
- Serve on the board for an organization that provides financial and work force development curriculums to LMI families.

Conclusions for Areas Receiving Limited-Scope Reviews

The bank's performance in the Lake County AA is poor and weaker than their performance in the Chicago MSA AA as FM has no branches in either low- or moderate-income tracts. However, the relative small size of this AA (compared to the Chicago AA) did not materially affect our overall conclusions for the state of Illinois.

Refer to Table 13 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

State Rating

State of Pennsylvania

CRA Rating for Pennsylvania: Needs to Improve

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is adequate. The distribution of loans by income level is good.
- The level of CD loans is adequate and had a neutral impact on our evaluation of the bank's lending performance.
- The level of CD investments is poor.
- The retail delivery systems are reasonably accessible to all geographies and individuals including low- and moderate-income.

Description of Institution's Operations in Pennsylvania

FM has a small presence in the state of Pennsylvania. The bank has one AA in the state and operates four banking offices and four ATMs. The state of Pennsylvania represents 2.1 percent of FM's total deposit base, 2.09 percent of their branching network, and 3 percent of their lending activity during this evaluation period. FM has \$240 million in deposits in the AA with a deposit market share of 15.02 percent.

Competition in the bank's AA is modest. Primary competitors include large regional and multinational institutions such as Wells Fargo, JPMorgan Chase, Huntington National Bank, FNB of PA and PNC Bank, NA.

The state of Pennsylvania carried very little weight in determining the overall bank rating. A nominal percentage of FM's deposits, branches, and lending activity are in this state.

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

Scope of Evaluation in Pennsylvania

We selected the Lawrence County AA to receive a full-scope review. We assigned more weight to HMDA lending than small loans to businesses as the bank made a significantly larger number of HMDA loans than small loans to businesses during this evaluation period. In terms of HMDA products, we assigned equal weight to home purchase and refinance loans. Home improvement loans received the least weight of the three products. We did not analyze multifamily or small loans to farms, as FM did not make any of these loans during this evaluation period in the AA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Pennsylvania is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Lawrence County AA is adequate.

Lending Activity

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

FM's lending activity during this evaluation period is good. The bank made 1,324 HMDA loans and 80 small loans to businesses in the Lawrence County AA. 2012 FDIC deposit data shows FM has a deposit market share of 15.02 percent and is ranked 3rd in Lawrence County. There are nine financial institutions with offices in this AA.

Based on 2011 peer mortgage data, FM ranked 1st in home purchase loans (20.29 percent market share), 10th in home improvement loans (2.87 percent market share), and 1st in refinance loans (15.57 percent market share) in the Lawrence County AA. There are 71 home purchase lenders, 28 home improvement lenders, and 95 refinance lenders that made loans in this AA.

The 2011 small business loan data showed FM ranked 13th in making small loans to businesses in the AA with a market share of 1.49 percent. There are 35 lenders in this market.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is adequate. The distribution of HMDA loans is adequate and the distribution of small loans to businesses is good. We assigned more weight to the bank's distribution of HMDA loans to arrive at the overall rating.

Home Mortgage Loans

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

FM's geographic distribution of HMDA loans is adequate.

The distribution of home purchase loans is adequate. FM's distribution of loans in low-income tracts is significantly lower than the percentage of owner-occupied units in these tracts. In moderate-income tracts, the bank's percentage of loans exceeds the comparators. The bank's market share in low-income tracts is significantly lower than their overall market share for all tracts. Their market share in moderate-income tracts exceeds their overall market share.

The distribution of home improvement loans is good. FM's distribution of loans in both low- and moderate-income CTs exceeds the respective comparators. The bank's market share in low-income CTs is significantly lower than their overall market share as FM made no loans in low-income CTs in 2011. However, their market share in moderate-income tracts exceeds their overall market share.

The distribution of refinance loans is poor. FM's distribution of loans in low-income tracts is significantly lower than the percentage of owner-occupied units in these tracts. Their market share in low-income tracts is significantly lower than their overall market share as the bank made no loans in low-income tracts in 2011. Their distribution of loans in moderate-income tracts is poor and lower than the percentage of owner-occupied units in these tracts. Their market share in moderate-income tracts exceeds their overall market share.

For 2012, FM's geographic distribution of loans is poor. Their distribution of both home purchase and refinance loans is weaker than the previous analysis period and is poor. FM made no home purchase or refinance loans in low income CTs. In moderate-income CTs, FM made no refinance loans and their home purchase lending in these tracts was significantly lower than the demographics. We did not analyze home improvement loans since the bank made a nominal number of these loans (nine).

Small Loans to Businesses

The distribution of small loans to businesses is good. The distribution of loans in low-income tracts is near the percentage of businesses in these tracts. The distribution of loans in moderate-income tracts exceeds the demographic comparator. FM's market share in low-income tracts exceeds their market share in all tracts. The bank's market share in moderate-income tracts also exceeds their overall market share.

In 2012, FM's distribution of small loans to businesses is adequate as their performance is weaker than the previous analysis period. Their distribution of loans in low-income

tracts exceeds the percentage of businesses in these tracts. Their distribution of loans in moderate-income CTs is significantly lower than the demographic comparators.

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

Lending Gap Analysis

We reviewed maps and lending reports for the Lawrence County AA. FM made loans in all CTs in the AA. We did not identify any unexplained gaps in FM's lending patterns.

Distribution of Loans by Income Level of the Borrower

Overall, the borrower distribution of loans is good. The bank's distribution of HMDA loans is good. Their distribution of small loans to businesses is adequate.

Home Mortgage Loans

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

The distribution of home purchase loans is excellent. The distribution of loans to both low- and moderate-income borrowers exceeds the comparators. The bank's market share of loans to both low- and moderate-income borrowers exceeds the overall market share.

The distribution of home improvement loans is adequate. The distribution of loans to low-income borrowers is somewhat lower than the percentage of low-income borrowers in the AA. The distribution of loans to moderate-income borrowers exceeds the bank's overall market share. FM's market share to low-income borrowers is poor as the bank made no loans to low-income borrowers in 2011. Their market share to moderate-income borrowers exceeds the comparators.

The distribution of refinance loans is good. The distribution of loans to low-income borrowers is somewhat lower than the percentage of low-income borrowers in the AA. However, the bank's distribution of loans to moderate-income borrowers exceeds the comparator. The bank's market share for loans to both low- and moderate-income borrowers exceeds their overall market share.

For 2012, the bank's distribution of home loans is good. Their distribution of home purchase loans is excellent. The bank's distribution of home purchase loans to both low- and moderate-income borrowers is near and exceeds the demographic comparators, respectively. Their distribution of refinance loans is adequate. Their distribution of loans to low-income borrowers is lower than the percentage of low-

income families in the AA. Their distribution of loans to moderate-income borrowers is near the percentage of moderate-income families in the AA. We did not analyze home improvement loans as the bank made a nominal number of these type loans (nine) and this loan volume was insufficient to perform a meaningful analysis.

Small Loans to Businesses

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

FM's distribution of loans to small businesses is adequate. The bank's portion of loans to small businesses is somewhat lower than the percentage of small businesses in the AA. However, the bank's small business market share exceeds their overall market share for lending to all businesses.

In 2012, FM made a nominal number of small loans to business loans (17). We did not analyze these loans since any analysis performed would be meaningless.

Community Development Lending

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

During this evaluation period, FM made four loans totaling \$1.37 million in this AA, which represents 4.30 percent of allocated Tier 1 capital. These CD loans were to organizations providing community services for low-and moderate-income individuals in the AA. The organizations provided services such as childcare, vocational training, transportation, and affordable housing to LMI individuals in the area. The bank's lending activity demonstrates adequate responsiveness to meeting the identified needs in the AA and had a neutral impact on the Lending Test rating. These loans were not innovative or complex.

Product Innovation and Flexibility

As described previously, FM participates in several flexible lending programs sponsored by Fannie Mae, the Small Business Administration and the Federal Home Loan Bank of Cincinnati.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Pennsylvania is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Lawrence County AA is poor.

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

Based on the opportunities in this AA, FM's level of CD investments is poor. During this evaluation period, FM made \$50 thousand in grants/donations to seven qualified community development organizations and shows poor responsiveness to meeting the needs in the AA. These organizations provide affordable housing and community services to low- and moderate-income individuals. These organizations provide shelters and community services to those most in need. The investment amount represents 0.16 percent of allocated Tier 1 capital.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Pennsylvania is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Lawrence County AA is adequate.

Retail Banking Services

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

The retail delivery systems are reasonably accessible to geographies and individuals of different income levels, including low- and moderate-income. FM has four banking offices in this AA, none of which is located in low-income tracts. The branch distribution in moderate-income tracts exceeds the population percentage. FM did not open or close any banking offices in this AA during the evaluation period.

Throughout the evaluation period, the bank has continued to provide services responsive to the banking needs of the community. The banking hours and services provided in this AA are consistent with the standard hours of operation and services provided throughout FM's footprint. The hours of operation do not vary in a way to inconvenience any particular areas or individuals.

Community Development Services

FM's level of CD services is adequate. Given the opportunities in the AA and the number of services provided, the bank showed adequate responsiveness to addressing the needs in the AA. Bank employees provided community development services to seven qualified CD organizations. Employees served on the board, audit and finance committee, and as treasurer for organizations that provide community services or affordable housing to LMI individuals or families or that provide economic development.

Some specific examples include:

- Serve on the loan committee for an organization that provides economic development to the AA through development, expansion, and job retention.
- Serve as President and on the audit and finance committees for a domestic violence or sexual assault shelter organization. The organization provides counseling, housing, and prevention education for women, children, and men and primarily serves LMI individuals.
- Serve on the fundraising committee for an organization that provides affordable housing for LMI individuals.

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): (01/31/08 to 12/31/12) Investment and Service Tests and CD Loans: (11/17/08 to 06/17/13)	
Financial Institution		Products Reviewed
FirstMerit N.A. (FM) Akron, Ohio		Home mortgage, small loans to business, CD loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
FirstMerit CDC A	Subsidiary	CD Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Counties
Ohio		
Akron MSA #1042	Full-scope	Portage and Summit
Ashtabula County	Limited-scope	Ashtabula
Canton-Massillon MSA #1594	Limited-scope	Stark
Cleveland-Elyria MSA #1746	Full-scope	Cuyahoga, Geauga, Lake, Lorain, Medina
Columbus MSA #1814	Limited-scope	Delaware, Franklin, Madison, Fairfield
Mansfield MSA #3190	Limited-scope	Richland
Sandusky #4178	Limited-scope	Erie
Toledo #4578	Limited-scope	Lucas and Wood
Non-MSA Contiguous Counties	Limited-scope	Ashland, Crawford, Huron, Seneca, Holmes, Knox and Wayne
Illinois		
Chicago-Naperville MSA 16794	Full-scope	Cook, Dupage, Kane, Will, McHenry
Lake County #29404	Limited-scope	Lake
Pennsylvania		
Lawrence County	Full-scope	Lawrence

Appendix C: Market Profiles for Full-Scope Areas

State of Ohio

Akron Ohio MSA

Demographic Information for Full Scope Area: Akron OH MSA - FM						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	166	11.45	22.89	43.98	21.69	0.00
Population by Geography	694,960	6.29	21.45	48.11	24.15	0.00
Owner-Occupied Housing by Geography	193,221	2.76	18.38	51.56	27.30	0.00
Business by Geography	62,338	7.24	12.95	44.58	35.22	0.00
Farms by Geography	1,640	2.38	8.96	60.00	28.66	0.00
Family Distribution by Income Level	184,471	19.24	18.62	23.21	38.93	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	69,838	9.82	30.72	47.63	11.84	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		52,418 65,600 10%	Median Housing Value Unemployment Rate (2000 US Census)	114,675 2.55%		

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

Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Akron OH MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	170	14.12	22.35	38.24	25.29	0.00
Population by Geography	703,200	9.27	20.30	39.41	31.03	0.00
Owner-Occupied Housing by Geography	197,765	4.58	18.89	42.20	34.33	0.00
Business by Geography	61,547	7.57	16.69	36.38	39.36	0.00
Farms by Geography	1,656	2.17	13.04	49.88	34.90	0.00
Family Distribution by Income Level	183,596	20.77	17.80	22.01	39.42	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	70,810	14.17	30.44	38.83	16.57	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		62,882 65,500 14%	Median Housing Value Unemployment Rate (2010 US Census)	146,330 4.67%		

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

Source: 2010 US Census and 2012 HUD updated MFI

FM's Akron AA consists of the entire Akron Metropolitan Statistical Area (MSA), which includes Portage and Summit counties. FM has 31 banking offices in this AA and a deposit market

share in the Akron AA of 24.66 percent and is ranked 1st. There are 29 institutions with offices in this AA. Competition in the AA is modest. Primary competitors include large regional and multinational institutions such as JPMorgan Chase, Fifth Third Bank, Huntington National Bank, PNC Bank, NA, and KeyCorp.

FM is primarily a mortgage lender. According to 2011 peer data, FM ranked 5th in home purchase loans (market share 5.78 percent), 1st in home improvement loans (market share 16.21 percent) and 2nd in refinance loans (market share 8.08 percent).

The Akron MSA is located in Northeast Ohio and is anchored by the city of Akron. Based on the 2010 census, the MSA has a population of 703,200 and is the 72nd largest MSA in the country. The Akron MSA is also part of the larger Cleveland-Akron-Canton, OH Combined Statistical Area that in 2010 had a total population of 3.5 million.

Although Akron enjoys a relatively diverse economy, the manufacturing sector still claims the highest employment concentration followed by professional and business services. Other major employers in the area include the University of Akron, with over 30,000 students, and Kent State University, which has over 41,000 students.

In the 2000 Census, approximately 10 percent of households were below the poverty level. In the 2010 Census, approximately 14 percent of households were below the poverty level. Of 284,941 total households in the AA, 22 percent are considered LMI. Of these LMI households, five in every eight live below the poverty level. The average unemployment rate in the Akron MSA increased from 5.55 to 8.5 percent between 2004 and 2011, with the highest point at 9.9 percent in 2010. As of June 2013, the unemployment rate for the Akron MSA of 7.1 percent compared favorably to the state unemployment rate of 7.2 percent and the national rate of 7.8 percent.

In 2006, Ohio's foreclosure rate, at 3.38 percent, was the highest of any state in the nation and about three times as high as the national average, which was 1.19 percent. Currently, Ohio has the third highest foreclosure rate in the nation and Akron posted the highest foreclosure rate for any city, based on a 147 percent increase in activity compared to last year. One in every 211 homes in Akron had a foreclosure filing in April 2013, this ranked more than four times the national average.

Housing

There was very little opportunity to make residential loans in low- and moderate-income tracts in this AA. Based on the 2000 census, there are 5,335 owner-occupied units in low-income tracts, which represent 2.76 percent of the owner-occupied units in the AA. The median housing value in these low-income tracts increased from \$56,022 in 2000 to \$71,110 according to 2010 census. The housing age also increased from 53 to 59 years, which indicates very little new construction occurred in these areas. Based on 2000 census, 59 percent of occupied units were rental and 12 percent were vacant. The 2010 census showed 52 percent of the units were rental and 17 percent vacant.

Based on 2000 census, there were 35,514 owner-occupied housing units in moderate-income tracts, which increased in 2010 to 37,357 units. The median housing value in 2000 was \$70,376 and increased to \$95,337 in 2010. The age of the housing stock and percentage of

vacant units also increased from 2000 to 2010. In 2000, the housing stock age was 50 years, which increased to 55 years in 2010. The percentage of vacant units increased from 7 percent in 2000 to 10.44 in 2010. However, the percentage of rental units decreased from 37 percent in 2000 to 35.58 percent in 2010.

Community Contact

We contacted a housing development corporation prior to this examination. The representative indicated that there is a need for quality affordable rental and 1-4 homes in this AA. The individual also indicated that there are opportunities for institutions to create mortgage loan programs that are better suited for individuals with lower FICO scores and programs that offer lower down payment requirements and lower fixed rate loans.

There is also an opportunity for banks to provide additional homeownership workshops or workshops designed to avoid predatory lending, either as a guest speaker or by providing funding.

Opportunities

Overall, the level of opportunities to provide CD loans, investments, and services in the AA is good.

In the Akron MSA, there are a few nonprofit CDCs capable of developing large Low- Income Housing Tax Credit (LIHTC) projects. East Akron Neighborhood Development Corporation (EANDC) is one of the premier nonprofit affordable housing developers in the Akron MSA. Other key LIHTC developers in the MSA include Neighborhood Development Services (NDS), Akron Metropolitan Housing Authority (AMHA) and Testa Enterprises, Inc.

We identified a large number of mission-driven nonprofit organizations in the AA that provide a wide variety of community development services and there are opportunities to invest in these organizations. However, the recent economic crisis has caused many nonprofit organizations to shrink their budgets, lay off staff, and/or merge with other nonprofits in an effort to remain viable. When the bank reviews contribution requests, the overall financial condition of the nonprofit is considered and can impact the level of support an organization might receive. There are no local CRA fund investment opportunities in the Akron MSA. Multi-bank equity funds syndicated by Ohio Capital Corporation for Housing are the primary providers for the majority of the equity for LIHTC projects in this MSA.

Cleveland Ohio MSA

Demographic Information for Full Scope Area: Cleveland Ohio MSA – FM						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	693	16.02	20.06	38.82	23.81	1.30
Population by Geography	2,148,143	9.74	16.77	43.79	29.67	0.03
Owner-Occupied Housing by Geography	580,878	4.83	12.41	48.22	34.54	0.00
Business by Geography	190,231	6.40	13.31	40.66	38.74	0.89
Farms by Geography	4,316	1.81	6.21	52.22	39.69	0.07
Family Distribution by Income Level	562,913	20.34	18.08	22.21	39.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	216,274	17.82	24.67	41.67	15.84	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		52,660 62,800 11%	Median Housing Value Unemployment Rate (2000 US Census)	121,274 2.62%		

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

Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Cleveland Ohio MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	636	16.35	21.23	36.16	25.47	0.79
Population by Geography	2,077,240	10.38	17.42	38.71	33.49	0.01
Owner-Occupied Housing by Geography	575,920	5.68	13.81	41.98	38.53	0.01
Business by Geography	188,165	7.98	14.02	38.30	38.93	0.77
Farms by Geography	4,369	2.75	8.33	45.25	43.63	0.05
Family Distribution by Income Level	535,574	21.71	17.29	20.69	40.30	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	208,889	19.45	25.53	37.15	17.86	0.01
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		62,627 63,700 13%	Median Housing Value Unemployment Rate (2010 US Census)	151,321 4.82%		

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

Source: 2010 US Census and 2012 HUD updated MFI

FM's Cleveland AA includes the entire Cleveland-Elyria-Mentor, Ohio MSA, including the counties of Cuyahoga, Geauga, Lake, Lorain, and Medina counties. The AA meets the regulatory requirements of the regulation.

In the Cleveland AA, FM has 53 banking offices and is ranked 7th with a deposit market share of 6.11 percent as of June 30, 2012. There are 44 institutions with offices in this AA. FM is

primarily a home mortgage lender. 2011 peer data showed FM ranked 11th in home purchase loans (market share 2.75 percent), 10th in home improvement loans (market share 2.94 percent) and 5th in refinance loans (market share 4.67 percent).

Competition in the AA is modest with large regional and multinational banks providing the strongest competition. Dominant financial institutions in this market include KeyCorp, PNC Bank NA, Third Federal Savings and Loan, Huntington National Bank, and Fifth Third Bank.

Employment and Economic Factors

The AA's location on Lake Erie and its close proximity to railroad makes the area an important manufacturing, industrial, and transportation center. The Cleveland AA is headquarters to the Progressive Insurance, Eaton Corporation, Parker-Hannifin, Sherwin-Williams, KeyCorp, Lubrizol Corporation, Nacco Industries, Medical Mutual of Ohio, Cliffs, Natural Resources, Applied Industrial Technologies, Agilysis, Lincoln Electric, and Invacare, all of which are in the May 2011 Fortune 500 list. Other major employers include Cleveland Clinic, Developers Diversified Realty Corporation, Forest City Enterprises, IMG, Jones Day, Nestle USA, Rockwell Automation, and the University Hospitals of Cleveland.

In recent years, the city of Cleveland has experienced high levels of foreclosures. While some lenders have effectively implemented workout solutions with delinquent borrowers, other lenders have been aggressive in taking foreclosure action. This has devastated many of Cleveland's neighborhoods, resulting in a large volume of vacant homes. Many of these homes are in a state of disrepair and need to be demolished because of vandalism.

Delinquent mortgages and foreclosures remain a much bigger problem in Greater Cleveland than in the rest of the nation, as numbers from the Mortgage Bankers Association in Washington D.C. show that 1 in 10 local homeowners was 90 days' past due or in foreclosure in the fourth quarter of 2012. Cleveland's foreclosure rate of 9.5 percent is 40 percent higher than the U.S. rate and the average for the top 25 metropolitan areas in the country.

In the 2000 Census, approximately 11 percent of households were below the poverty level. In the 2010 Census, approximately 13 percent of households were below the poverty level. Of 186,669 total households in the AA, 22 percent are considered LMI. Of these LMI households, three in five live below the poverty level. The average unemployment rate in the Cleveland MSA increased from 5.8 to 7.9 percent between 2004 and 2011, with the highest point at 8.8 percent in 2009.

Job growth in this AA has been negative in recent years. The Bureau of Labor Statistics (BLS) data for June 2013 reported the civilian labor force was approximately 1.06 million with 82 thousand or 7.7 percent unemployed. June 2012 data reported the civilian labor force at 1.09 million people with 82 thousand or 7.5 percent unemployed. The 2013 rate is an improvement from June 2009 when 105 thousand or 7.5 percent of the labor force was unemployed.

Housing

According to 2000 census, there were 28,079 owner-occupied units in low-income tracts and 72,079 in moderate-income tracts. The number of owner-occupied units increased in the 2010 census to 32,708 in low-income tracts and 79,520 in moderate-income tracts.

Of the occupied units, 55 percent were rental and 15 percent were vacant in 2000 in low-income tracts. The percentage of rental units remained high but decreased to 47 percent and vacant units increased to 26 percent according to the 2010 census in low-income tracts. The results in moderate-income tracts were similar. In 2000, rental and vacant units accounted for 47 percent and 9 percent of occupied unit, respectively. However, the percentage of rental units decreased to 41 percent and vacant units increased to 16 percent in 2010. The high percentage of rental and vacant units in these tracts hampers the bank's ability to make residential loans in these areas.

The median housing values in these tracts also increased from the 2000 census to 2010. In low-income tracts, the median housing value increased from \$59,174 in 2000 to \$76,195 in 2010. In moderate-income tracts, the median housing value also increased from \$74,635 to \$99,741 in 2010. The median housing age also increased from 57 to 66 years in low-income tracts, but decreased from 52 years to 50 years in moderate-income tracts.

Community Contact

We contacted two community development organizations prior to this examination: a housing organization and an economic development organization. They indicated that there is a need for more access to mortgage loans and lower rates for rehabilitation loans. Although foreclosure rates are still high in the area, there is a demand for homeownership education.

There are opportunities for banks to provide general operating support for organizations providing homeownership and foreclosure prevention counseling. Low-cost financing for rehabilitation loans is needed; directly to consumers, through investments made either to organizations, or through a very low-cost rehabilitation loan pool. In addition, there are opportunities for bank representatives to serve on loan committees and to provide marketing for these homeownership organizations.

Opportunities

Overall, the opportunity to make CD loans and investments and provide CD services in the MSA is good. Within the MSA, we identified numerous local nonprofit organizations that provide important community services to the local market.

The Cleveland Housing Network (CHN) is the primary nonprofit CDC developer of LIHTC for affordable housing in the city of Cleveland. CHN's homeownership center provides a major source of first-time homebuyer candidates in the city of Cleveland and CHN consistently originate most of the LIHTC activity in Cleveland.

State of Illinois

Chicago Illinois MSA

Demographic Information for Full Scope Area: Chicago IL MSA – FM						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,686	13.82	25.27	34.64	25.27	1.01
Population by Geography	7,447,364	8.04	23.84	38.60	29.51	0.01
Owner-Occupied Housing by Geography	1,706,976	2.65	15.37	44.30	37.68	0.00
Business by Geography	637,347	3.51	13.90	37.25	45.12	0.22
Farms by Geography	8,280	1.40	9.99	45.72	42.89	0.00
Family Distribution by Income Level	1,818,388	21.02	17.57	21.95	39.46	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	701,684	14.60	34.01	37.28	14.12	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		60,166 76,200 10%	Median Housing Value Unemployment Rate (2000 US Census)		175,341 3.22%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Chicago Illinois MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,820	13.46	23.96	31.37	30.93	0.27
Population by Geography	7,613,188	9.28	24.13	33.36	33.23	0.00
Owner-Occupied Housing by Geography	1,834,589	4.07	18.36	37.23	40.34	0.00
Business by Geography	612,426	5.05	16.17	32.58	46.09	0.11
Farms by Geography	8,422	2.81	13.56	38.83	44.76	0.04
Family Distribution by Income Level	1,821,002	22.85	16.86	19.35	40.94	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	723,129	16.28	34.54	32.50	16.68	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		72,747 77,300 12%	Median Housing Value Unemployment Rate (2010 US Census)		289,735 4.77%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2012 HUD updated MFI

FM entered the Chicago market in 2010 with the purchase of three small financial institutions. Thus, FM is very new in the Chicago market and it has taken some time for the market to recognize FirstMerit's brand identity. Additionally, FM's largest acquisition (Midwest Bank) did not have a mortgage platform, so it has taken FirstMerit Mortgage a significant amount of time and effort to build its Chicago mortgage team.

The Chicago AA includes Cook, Dupage, Kane, Will, and McHenry counties in the Chicago-Naperville-Joliet MSA. The AA does not consist of the entire MSA but does consist of whole geographies and meets the legal requirements of the regulation. The AA includes geographies that FM can reasonably serve and all CTs where the bank has banking offices.

The Chicago market is extremely competitive and the largest financial institutions in the United States (JPMorgan Chase, Bank of America, PNC Bank, N.A.) have significant market share in the AA. In total, there are over 249 financial institutions operating in the Chicago metro area. FM has a small presence in this AA with 39 banking offices and a deposit market share of 0.91 percent in this AA. FM is primarily a home mortgage lender and 2011 peer mortgage data shows FM is ranked 60th in home purchase lending (market share 0.23 percent) and 55th in refinance lending (market share 0.19 percent).

Employment and Economic Factors

The city is an international hub for finance, commerce, industry, telecommunications, and transportation, with O'Hare International Airport being the second-busiest airport in the world in terms of traffic movement. Chicago is one of the most important worldwide centers of commerce and trade. Today, Chicago is listed as an alpha plus global city by the Globalization and World Cities Research Network, and ranks seventh in the world in the 2012 Global Cities Index.

According to CNN Money, the Chicago metropolitan area is home to the corporate headquarters of 28 Fortune 500 companies, including Boeing, Exelon, and United Continental Holdings. The area is a major financial center in North America. According to The city of Chicago's website, it is home to the busiest futures exchange in the world, the Chicago Board of Trade.

Based on June 2013 data from the Bureau of Labor Statistics (BLS), Illinois has the 50th highest unemployment rate in the nation at 9.2 percent compared to the national rate of 7.8 percent. Within the Chicago MSA, the unemployment rates range from a high of 10.8 percent in Cook County to a low of 8.6 percent in Dupage County.

Housing

Based on the 2000 Census, there were 45,205 owner-occupied housing units in low-income tracts, which represents 3 percent of all owner-occupied units in the AA. Of the occupied housing units, 65 percent were rental and 15 percent vacant. In 2010, the rental percentages remained high but did decrease to 55 percent while vacancy significantly increased to 21 percent. The median housing value in low-income tracts was relatively high at \$97,828, but increased to \$172,986 with the 2010 Census. The average age of the housing stock was 52 years in 2000 and increased to 64 years in 2010.

In moderate-income tracts, the results were similar. The median housing value was \$111,564 in 2000 compared to \$195,097 in 2010. The vacancy percentages also increased from 7 to 11 percent in 2010, however the rental percentages decreased from 51 to 41 percent. The high housing cost coupled with an aging housing stock and high percentage of rental units can make it difficult to make home loans in these tracts.

Opportunities

There are numerous opportunities to make CD loans and investments and provide CD services in the Chicago AA. Many sophisticated, accomplished, and well-capitalized community development organizations operate in the region. An extensive network of foundations, research centers and universities provide funding, information and expertise to support these organizations.

In the Chicago area, we identified a partial list of community development organizations. These organizations includes seven organizations that provide financial services and/or financial education to LMI individuals or small businesses; three housing/neighborhood revitalization entities; a Community Development Financial Institution (CDFI); an organization that assists small businesses with financing; a Local Initiatives Support Corporation (LISC) with 12 locations; a community loan fund; and an economic development organization.

Community Contact

Prior to this exam, OCC Community Affairs Officers contacted several community organizations in the Chicago-Naperville-Joliet MSA. They also reviewed recent contacts made by other regulatory agencies to determine the credit needs of the community and opportunities for financial institutions to help meet those needs. The type of organizations include a housing agency, small business development company, and economic development agency,

The contacts indicated that there is a need for more small business loans, and loan modifications and forbearance programs to assist at risk homeowners from foreclosure. One program available for bank participation is the Illinois Hardest Hit program, which provides up to \$25 thousand in assistance over an 18-month period to assist homeowners to become and stay current on their loan. This loan program offers a 10-year forgivable second mortgage.

State of Pennsylvania

Lawrence County Pennsylvania MSA

Demographic Information for Full Scope Area: Lawrence County PA – FM						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	27	7.41	11.11	70.37	11.11	0.00
Population by Geography	94,643	4.26	9.29	68.72	17.73	0.00
Owner-Occupied Housing by Geography	28,660	2.17	6.94	73.60	17.29	0.00
Business by Geography	7,168	7.48	9.01	60.73	22.78	0.00
Farms by Geography	261	0.77	1.92	77.78	19.54	0.00
Family Distribution by Income Level	26,026	18.03	19.37	23.21	39.39	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	9,734	7.16	12.38	67.79	12.67	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		41,475 54,900 12%	Median Housing Value Unemployment Rate (2000 US Census)	71,572 2.83%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Lawrence County Pennsylvania MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	7.14	14.29	64.29	14.29	0.00
Population by Geography	91,108	3.64	8.84	68.74	18.78	0.00
Owner-Occupied Housing by Geography	28,592	3.28	6.56	70.93	19.23	0.00
Business by Geography	7,003	3.00	16.72	56.60	23.68	0.00
Farms by Geography	258	0.00	2.33	84.50	13.18	0.00
Family Distribution by Income Level	25,107	19.46	19.48	21.93	39.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	9,777	6.74	10.66	69.75	12.86	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		52,966 55,500 13%	Median Housing Value Unemployment Rate (2010 US Census)	97,848 3.71%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2012 HUD updated MFI

FM's only AA in Pennsylvania is the Non-MSA AA of Lawrence County. Lawrence County is a small, primarily rural county located in western Pennsylvania about 45 minutes north of Pittsburgh and is one of FM's smallest markets. FM has four branches and four ATMs in this AA. The AA represents two percent of the bank's deposits and FM originated two percent of its reportable loans within this AA.

The Lawrence County AA consists of entire geographies and meets the legal requirements of the regulation. Lawrence County is part of the Pittsburgh – New Castle Consolidated Metropolitan Statistical Area (CMSA) and makes up the entire New Castle PA Micropolitan Statistical Area. The AA includes all areas where FM has banking offices and can reasonably serve. The county seat of Lawrence County is New Castle.

Based on June 30, 2012 FDIC deposit data, there are nine financial institutions in this AA operating out of 33 banking offices. FM is ranked 3rd with deposit market share of 15.02 percent. FM has four banking offices in the area. Financial leaders in this AA include ESB Bank (market share 22.81 percent) and FNB of PA (market share 15.98 percent).

In the 2000 Census, approximately 12 percent of households were below the poverty level. In the 2010 Census, approximately 13 percent of households were below the poverty level. Of 36,587 total households in the AA, 22 percent are considered LMI. Of these LMI households, four in seven live below the poverty level. The average unemployment rate in Lawrence County increased from 5.7 to 8.4 percent between 2004 and 2011, with the highest point at 11.2 percent in 2010. Pennsylvania's foreclosure rate of 0.70 percent was the nineteenth highest in the nation in 2006, and as of 2011, Pennsylvania has one of the lowest foreclosure rates in the U.S.

June 2013 data from the Bureau of Labor Statistics (BLS) showed an unemployment rate of 8.2 percent for Lawrence County compared to the state unemployment rate of 7.9 percent. Major employers in the area include Jameson Memorial Hospital, state government, school districts, Westminster College, Ellwood City Hospital and the county government.

Housing

Based on 2000 Census, there were 622 owner-occupied units in low-income tracts and 1,989 in moderate-income tracts. In low-and moderate-income tracts, owner-occupied units represent 2 and 7 percent of all owner-occupied units in the AA, respectively. In low-income tracts, the median housing age was 52 years with a median value of \$29,024, compared to 60 years and \$39,111 in moderate-income tracts.

Based on 2010 census, the housing age continued to increase in both low- and moderate-income tracts. In low-income tracts, the median age is 71 and in moderate-income tracts, the age is 66. The housing value also increased to \$32,105 in low-income and \$50,267 in moderate-income tracts. Some improvement was noted with the percentage of rental units, which decreased from 53 percent in 2000 to 26 percent in 2010 in low-income tracts and from 40 percent in 2000 to 38 percent in 2010 in moderate-income tracts. The percentage of vacant units in low-income tracts also decreased from 13 percent in 2000 to 11 percent in 2010. However, the percentage of vacant units in moderate-income tracts increased from 9 percent in 2000 to 20 percent in 2010. While the housing value is relatively affordable for low- and moderate-income individuals, the high percentage of rental and vacant units coupled with the low number of owner-occupied units limits the bank's ability to make residential loans in these areas.

Community Contact

Prior to this exam, we contacted a housing agency to assess the credit needs in this community. The representative indicated that there is a need for more homeless shelters, transitional housing, and homeless prevention services in this AA. There are opportunities for financial institutions to provide program support for job training, housing programs, and financial literacy programs. There is also an opportunity for banks to purchase tax credits, provide below market construction financing, participate on the board for various community organizations and provide favorable terms for lines of credit.

Opportunities

The opportunity to make CD loans and investments and provide CD services in this AA is limited. We did not identify any nonprofit CDC's that are capable of implementing Low Income Housing Tax Credits (LIHTC) developments in the county. We identified less than a dozen community development-related, active nonprofit organizations in Lawrence County

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Multifamily Loans - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 7. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 8. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. Borrower Distribution of Home Improvement Loans - See Table 8.

Table 10. Borrower Distribution of Refinance Loans - See Table 8.

Table 11. Borrower Distribution of Small Loans to Businesses - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

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

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

borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As ___12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Tables of Performance Data

State of Ohio

State of Illinois

State of Pennsylvania

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
Assessment Area (2011):	% 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:												
Akron OH MSA	23.62	4,412	518,161	1,647	233,893	1	1	36	37,877	6,096	789,932	33.39
Cleveland OH MSA	32.85	6,043	864,549	2,391	387,781	7	466	38	88,881	8,479	1,341,677	35.39
Limited Review:												
Ashtabula County	2.69	597	51,134	92	9,182	1	15	4	1,026	694	61,357	1.86
Canton OH MSA	16.85	3,725	423,634	605	76,575	1	5	17	27,701	4,348	527,915	16.92
Columbus OH MSA	4.66	851	152,526	346	92,009	0	0	7	6,435	1,204	250,970	3.01
Mansfield OH MSA	3.23	667	61,865	163	25,679	1	151	3	603	834	88,298	1.46
NonMSA Contiguous Counties	13.39	3,014	314,321	429	60,124	11	1,396	3	404	3,457	376,245	6.54
Sandusky OH MSA	1.26	283	40,421	41	5,996	1	169	0	0	325	46,586	0.50
Toledo OH MSA	1.45	183	23,830	186	42,699	1	10	3	6,326	373	72,865	0.93

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2012.

*** Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2011		Geography: OHIO								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31,					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Akron OH MSA	1,315	22.98	2.76	2.51	18.38	20.76	51.56	54.68	27.30	22.05	5.77	12.70	8.70	6.38	3.99
Cleveland OH MSA	1,578	27.57	4.83	0.95	12.41	6.02	48.22	57.48	34.54	35.55	2.75	1.68	1.97	3.11	2.48
Limited Review:															
Ashtabula County	175	3.06	0.00	0.00	11.09	9.71	88.91	90.29	0.00	0.00	7.55	0.00	8.33	7.49	0.00
Canton OH MSA	1,178	20.58	1.00	0.00	14.85	5.69	63.33	64.69	20.82	29.63	9.56	0.00	9.68	8.64	11.70
Columbus OH MSA	288	5.03	3.51	5.56	17.46	6.60	42.33	44.79	36.70	43.06	0.73	2.75	0.32	0.71	0.76
Mansfield OH MSA	196	3.42	0.16	0.00	14.17	5.61	58.08	56.63	27.58	37.76	6.93	0.00	0.00	5.95	9.47
NonMSA Contiguous Counties	851	14.87	0.00	0.00	3.09	1.76	84.16	83.78	12.75	14.45	8.23	0.00	6.67	8.24	8.48
Sandusky OH MSA	85	1.49	0.00	0.00	18.57	10.59	65.56	60.00	15.87	29.41	4.16	0.00	1.06	3.68	7.07
Toledo OH MSA	57	1.00	3.20	1.75	16.37	5.26	49.55	31.58	30.88	61.40	0.71	0.00	0.00	0.52	0.97

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2011			Geography: OHIO								Evaluation Period: JANUARY 1, 2008 TO				
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:															
Akron OH MSA	367	33.03	2.76	4.90	18.38	34.06	51.56	51.23	27.30	9.81	17.52	37.50	30.21	15.35	10.00
Cleveland OH MSA	325	29.25	4.83	3.69	12.41	8.31	48.22	59.38	34.54	28.62	2.85	1.18	0.71	2.90	3.89
Limited Review:															
Ashtabula County	52	4.68	0.00	0.00	11.09	5.77	88.91	94.23	0.00	0.00	8.33	0.00	16.67	7.84	0.00
Canton OH MSA	147	13.23	1.00	0.68	14.85	22.45	63.33	54.42	20.82	22.45	9.09	0.00	11.86	7.49	12.86
Columbus OH MSA	23	2.07	3.51	4.35	17.46	13.04	42.33	65.22	36.70	17.39	0.11	5.00	0.00	0.00	0.00
Mansfield OH MSA	31	2.79	0.16	0.00	14.17	9.68	58.08	61.29	27.58	29.03	2.61	0.00	0.00	3.06	2.44
NonMSA Contiguous Counties	149	13.41	0.00	0.00	3.09	4.03	84.16	77.18	12.75	18.79	5.84	0.00	11.11	6.23	0.00
Sandusky OH MSA	5	0.45	0.00	0.00	18.57	0.00	65.56	80.00	15.87	20.00	0.00	0.00	0.00	0.00	0.00
Toledo OH MSA	12	1.08	3.20	0.00	16.37	8.33	49.55	75.00	30.88	16.67	0.51	0.00	0.00	0.58	0.79

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2011			Geography: OHIO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER						
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:															
Akron OH MSA	2,709	21.04	2.76	1.03	18.38	10.78	51.56	57.77	27.30	30.42	8.09	4.40	9.57	9.80	6.19
Cleveland OH MSA	4,107	31.90	4.83	0.17	12.41	3.60	48.22	51.40	34.54	44.83	4.66	0.00	3.79	5.67	4.07
Limited Review:															
Ashtabula County	368	2.86	0.00	0.00	11.09	5.71	88.91	94.29	0.00	0.00	12.28	0.00	18.18	11.94	0.00
Canton OH MSA	2,400	18.64	1.00	0.08	14.85	4.00	63.33	62.96	20.82	32.96	14.55	16.67	13.01	14.14	15.36
Columbus OH MSA	537	4.17	3.51	1.68	17.46	1.49	42.33	38.55	36.70	58.29	0.77	1.55	0.09	0.68	0.87
Mansfield OH MSA	439	3.41	0.16	0.00	14.17	2.96	58.08	58.09	27.58	38.95	11.16	0.00	9.68	12.04	10.07
NonMSA Contiguous Counties	2,010	15.61	0.00	0.00	3.09	0.90	84.16	84.18	12.75	14.93	14.32	0.00	11.11	14.85	11.65
Sandusky OH MSA	193	1.50	0.00	0.00	18.57	0.00	65.56	63.21	15.87	36.79	6.08	0.00	0.00	5.75	8.68
Toledo OH MSA	110	0.85	3.20	0.00	16.37	4.55	49.55	53.64	30.88	41.82	0.52	0.00	0.00	0.94	0.29

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: OHIO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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:															
Akron OH MSA	21	30.88	12.03	0.00	24.76	38.10	44.88	52.38	18.33	9.52	5.41	0.00	16.67	4.76	0.00
Cleveland OH MSA	33	48.53	12.81	6.06	25.25	12.12	44.29	51.52	17.66	30.30	10.39	0.00	11.11	5.71	22.22
Limited Review:															
Ashtabula County	2	2.94	0.00	0.00	29.25	50.00	70.75	50.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Canton OH MSA	0	0.00	6.14	0.00	16.17	0.00	48.81	0.00	28.88	0.00	0.00	0.00	0.00	0.00	0.00
Columbus OH MSA	3	4.41	12.69	0.00	31.82	0.00	34.21	33.33	21.29	66.67	0.83	0.00	0.00	0.00	2.08
Mansfield OH MSA	1	1.47	1.06	0.00	25.75	100.00	53.27	0.00	19.92	0.00	11.11	0.00	20.00	0.00	0.00
NonMSA Contiguous Counties	4	5.88	0.00	0.00	6.78	0.00	84.71	100.00	8.51	0.00	6.67	0.00	0.00	9.09	0.00
Sandusky OH MSA	0	0.00	0.00	0.00	31.32	0.00	48.15	0.00	20.53	0.00	0.00	0.00	0.00	0.00	0.00
Toledo OH MSA	4	5.88	7.57	0.00	22.77	0.00	51.38	75.00	18.29	25.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

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

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

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011			Geography: OHIO						Evaluation Period: JANUARY 1, 2008 TO						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Akron OH MSA	1,647	28.00	7.24	10.38	12.95	15.06	44.58	42.44	35.22	32.12	4.59	6.70	5.37	4.50	4.29
Cleveland OH MSA	2,373	40.34	6.40	3.50	13.31	7.54	40.66	49.05	38.74	39.91	2.09	1.62	1.78	2.61	1.84
Limited Review:															
Ashtabula County	92	1.56	0.00	0.00	13.45	10.87	86.55	89.13	0.00	0.00	2.65	0.00	0.86	3.10	0.00
Canton OH MSA	605	10.29	3.04	3.97	13.29	13.06	56.68	52.07	26.98	30.91	3.72	4.84	4.75	3.59	3.79
Columbus OH MSA	346	5.88	6.41	6.94	16.92	21.10	37.37	41.04	39.30	30.92	0.45	1.15	0.49	0.63	0.22
Mansfield OH MSA	163	2.77	2.54	0.61	15.93	27.61	53.51	47.24	28.02	24.54	2.89	0.00	2.10	3.15	3.50
NonMSA Contiguous Counties	429	7.29	0.00	0.00	2.69	3.96	85.98	88.11	11.33	7.93	1.83	0.00	0.00	2.04	1.22
Sandusky OH MSA	41	0.70	0.00	0.00	20.53	9.76	62.78	56.10	16.69	34.15	1.47	0.00	0.00	1.48	3.13
Toledo OH MSA	186	3.16	4.18	8.06	12.30	12.37	45.31	47.85	38.21	31.72	0.72	2.04	0.68	0.95	0.48

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS 2011		Geography: OHIO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31,							
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:															
Akron OH MSA	1	4.17	2.38	0.00	8.96	0.00	60.00	100.00	28.66	0.00	5.26	0.00	0.00	6.25	0.00
Cleveland OH MSA	7	29.17	1.81	0.00	6.21	0.00	52.22	85.71	39.69	14.29	7.58	0.00	0.00	10.81	3.85
Limited Review:															
Ashtabula County	1	4.17	0.00	0.00	2.75	0.00	97.25	100.00	0.00	0.00	8.33	0.00	0.00	8.33	0.00
Canton OH MSA	1	4.17	0.54	0.00	6.55	0.00	72.02	100.00	20.90	0.00	3.33	0.00	0.00	5.88	0.00
Columbus OH MSA	0	0.00	1.82	0.00	10.77	0.00	53.83	0.00	33.58	0.00	0.00	0.00	0.00	0.00	0.00
Mansfield OH MSA	1	4.17	0.60	0.00	3.02	0.00	69.56	0.00	26.81	100.00	0.00	0.00	0.00	0.00	0.00
NonMSA Contiguous Counties	11	45.83	0.00	0.00	0.60	0.00	83.96	81.82	15.44	18.18	0.99	0.00	0.00	0.88	1.64
Sandusky OH MSA	1	4.17	0.00	0.00	6.61	0.00	79.88	100.00	13.51	0.00	0.00	0.00	0.00	0.00	0.00
Toledo OH MSA	1	4.17	0.84	0.00	6.84	0.00	59.65	100.00	32.67	0.00	0.53	0.00	0.00	0.64	0.00

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 2011		Geography: OHIO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31,							
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 ¹	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{**}	Overall	Low	Mod	Mid	Upp
Full Review:															
Akron OH MSA	1,315	22.98	19.24	21.92	18.62	32.65	23.21	19.87	38.93	25.55	6.42	9.76	6.88	5.33	5.44
Cleveland OH MSA	1,578	27.57	20.34	19.03	18.08	27.01	22.21	23.64	39.37	30.32	3.16	4.12	2.56	3.51	3.04
Limited Review:															
Ashtabula County	175	3.06	19.55	14.37	19.97	29.89	23.97	28.74	36.51	27.01	8.76	13.25	7.98	7.14	9.33
Canton OH MSA	1,178	20.58	17.39	13.60	19.20	28.83	23.89	25.13	39.52	32.44	11.14	9.78	9.42	10.73	13.53
Columbus OH MSA	288	5.03	19.44	14.03	18.02	21.94	22.64	26.98	39.90	37.05	0.88	0.34	0.60	1.14	1.05
Mansfield OH MSA	196	3.42	17.95	16.92	19.32	30.77	23.37	22.56	39.36	29.74	8.19	12.50	8.45	6.47	7.51
NonMSA Contiguous Counties	851	14.87	15.28	11.94	19.00	35.34	25.17	22.22	40.55	30.50	9.38	9.64	9.76	8.09	9.90
Sandusky OH MSA	85	1.49	19.00	18.07	18.59	27.71	23.34	22.89	39.07	31.33	4.36	5.04	2.87	2.20	6.78
Toledo OH MSA	57	1.00	21.22	14.29	17.65	16.07	22.05	21.43	39.07	48.21	0.81	1.10	0.47	0.61	1.09

^{*} Based on 2011 Peer Mortgage Data (USPR)

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 2.1% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2011			Geography: OHIO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31,						
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 ²	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans ^{**}	Overa II	Low	Mod	Mid	Upp
Full Review:															
Akron OH MSA	367	33.03	19.24	21.94	18.62	30.00	23.21	23.06	38.93	25.00	17.87	20.31	21.62	12.63	16.30
Cleveland OH MSA	325	29.25	20.34	18.30	18.08	25.87	22.21	24.61	39.37	31.23	2.99	3.11	2.90	2.98	3.02
Limited Review:															
Ashtabula County	52	4.68	19.55	13.73	19.97	33.33	23.97	21.57	36.51	31.37	8.74	0.00	12.50	3.70	12.82
Canton OH MSA	147	13.23	17.39	19.01	19.20	23.24	23.89	23.24	39.52	34.51	8.93	6.67	7.34	9.21	12.64
Columbus OH MSA	23	2.07	19.44	22.73	18.02	18.18	22.64	27.27	39.90	31.82	0.12	0.00	0.00	0.58	0.00
Mansfield OH MSA	31	2.79	17.95	23.33	19.32	6.67	23.37	33.33	39.36	36.67	2.82	7.14	2.50	2.86	1.89
NonMSA Contiguous Counties	149	13.41	15.28	15.65	19.00	23.13	25.17	30.61	40.55	30.61	6.12	6.25	3.23	10.68	4.73
Sandusky OH MSA	5	0.45	19.00	20.00	18.59	20.00	23.34	60.00	39.07	0.00	0.00	0.00	0.00	0.00	0.00
Toledo OH MSA	12	1.08	21.22	25.00	17.65	50.00	22.05	8.33	39.07	16.67	0.52	1.54	0.00	0.00	0.82

^{*} Based on 2011 Peer Mortgage Data (USPR)

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2011		Geography: OHIO								Evaluation Period: JANUARY 1, 2008 TO DECEMBER					
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 ³	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{***}	Over all	Low	Mod	Mid	Upp
Full Review:															
Akron OH MSA	2,709	21.04	19.24	12.66	18.62	21.69	23.21	27.11	38.93	38.54	9.01	13.03	10.03	9.86	7.71
Cleveland OH MSA	4,107	31.90	20.34	10.23	18.08	21.38	22.21	25.76	39.37	42.64	5.34	7.35	7.49	5.45	4.50
Limited Review:															
Ashtabula County	368	2.86	19.55	7.56	19.97	19.05	23.97	35.01	36.51	38.38	13.42	16.00	15.43	14.03	11.78
Canton OH MSA	2,400	18.64	17.39	9.51	19.20	22.00	23.89	25.45	39.52	43.04	16.73	19.23	18.81	18.15	14.88
Columbus OH MSA	537	4.17	19.44	6.46	18.02	15.59	22.64	19.77	39.90	58.17	0.93	0.87	0.73	0.71	1.06
Mansfield OH MSA	439	3.41	17.95	6.81	19.32	23.24	23.37	29.58	39.36	40.38	12.56	8.57	12.73	16.71	10.60
NonMSA Contiguous Counties	2,010	15.61	15.28	6.97	19.00	21.83	25.17	27.84	40.55	43.36	15.93	17.75	18.90	15.99	14.48
Sandusky OH MSA	193	1.50	19.00	11.58	18.59	20.00	23.34	26.84	39.07	41.58	6.83	13.64	5.74	6.64	6.35
Toledo OH MSA	110	0.85	21.22	12.04	17.65	18.52	22.05	30.56	39.07	38.89	0.60	1.52	0.90	0.41	0.49

^{*} Based on 2011 Peer Mortgage Data (USPR)

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011		Geography: OHIO			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
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:									
Akron OH MSA	1,647	27.92	65.28	50.27	66.55	15.91	17.55	4.59	5.97
Cleveland OH MSA	2,391	40.53	64.75	48.01	61.69	16.60	21.71	2.09	2.10
Limited Review:									
Ashtabula County	92	1.56	69.98	60.87	69.57	19.57	10.87	2.65	3.00
Canton OH MSA	605	10.25	67.45	56.20	66.12	18.68	15.21	3.72	5.25
Columbus OH MSA	346	5.86	62.64	29.19	43.35	18.79	37.86	0.45	0.33
Mansfield OH MSA	163	2.76	65.68	49.08	61.35	19.63	19.02	2.89	2.91
NonMSA Contiguous Counties	429	7.27	69.64	51.05	66.90	14.92	18.18	1.83	2.14
Sandusky OH MSA	41	0.69	64.01	48.78	58.54	31.71	9.76	1.47	2.65
Toledo OH MSA	186	3.15	64.04	37.10	44.62	25.27	30.11	0.72	0.54

^{*} Based on 2011 Peer Small Business Data -- US and PR

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

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

^{****} 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 7.10% 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 31, 2011			Geography: OHIO		Evaluation Period: JANUARY 1, 2008 TO DECEMBER				
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:									
Akron OH MSA	1	4.17	97.68	100.00	100.00	0.00	0.00	5.26	16.67
Cleveland OH MSA	7	29.17	97.38	71.43	71.43	28.57	0.00	7.58	13.04
Limited Review:									
Ashtabula County	1	4.17	98.82	100.00	100.00	0.00	0.00	8.33	14.29
Canton OH MSA	1	4.17	98.48	0.00	100.00	0.00	0.00	3.33	0.00
Columbus OH MSA	0	0.00	96.78	0.00	0.00	0.00	0.00	0.00	0.00
Mansfield OH MSA	1	4.17	98.99	0.00	0.00	100.00	0.00	0.00	0.00
NonMSA Contiguous Counties	11	45.83	98.68	72.73	63.64	9.09	27.27	0.99	0.95
Sandusky OH MSA	1	4.17	98.20	100.00	0.00	100.00	0.00	0.00	0.00
Toledo OH MSA	1	4.17	97.11	100.00	100.00	0.00	0.00	0.53	0.61

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

**** 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 16.67% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: OHIO									
Evaluation Period: NOVEMBER 17, 2008 TO JUNE 17, 2013									
Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Akron OH MSA	0	0	192	7,414	192	7,414	20.47	14	4,692
Cleveland OH MSA	0	0	215	6,271	215	6,271	17.32	13	3,681
Limited Review:									
Ashtabula County	0	0	21	17	21	17	0.05	0	0
Canton OH MSA	0	0	73	1,370	73	1,370	3.78	3	665
Columbus OH MSA	0	0	75	9,106	75	9,106	25.14	19	5,514
Mansfield OH MSA	0	0	17	321	17	321	0.89	1	218
NonMSA Contiguous Counties	0	0	87	1,108	87	1,108	3.06	2	590
Sandusky OH MSA	0	0	1	1,152	1	1,152	3.18	1	1,026
Toledo OH MSA	0	0	35	1,707	35	1,707	4.71	3	108
Statewide/Regional Investments with Potential to Benefit AAs	1	1,728	1	260	2	1,988	5.19	0	0
Regional Investments with Potential to Benefit AAs	1	800	3	5,068	4	5,868	16.20	3	4,932

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: OHIO Evaluation Period: NOVEMBER 17, 2008 TO JUNE 17, 2013																	
MA/Assessment Area:	Deposits % of Rated Area Deposits in AA	Branches						Branch Openings/Closings						Population			
		# of BANK Branches	% of Rated Area Branch 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:																	
Akron MSA	33.39	31	21.68	9.68	22.58	38.71	29.03	0	4	-1	-2	0	-1	6.29	21.45	48.11	24.15
Cleveland MSA	35.39	53	37.06	5.66	16.98	47.17	30.19	2	8	-1	+1	-4	-2	9.74	16.77	43.79	29.67
Limited Review:																	
Ashtabula County	1.86	5	3.49	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	14.81	85.19	0.00
Canton MSA	16.92	16	11.19	6.25	12.50	50.00	31.25	0	0	0	0	0	0	2.03	17.52	60.40	20.05
Columbus MSA	3.01	14	9.79	0.00	14.29	57.14	28.57	0	0	0	0	0	0	7.71	23.00	38.99	30.31
Mansfield MSA	1.46	4	2.80	0.00	25.00	75.00	0.00	0	0	0	0	0	0	2.08	17.95	56.06	23.91
NonMSA Contiguous Counties	6.54	16	11.19	0.00	6.25	62.50	31.25	1	0	0	0	+1	0	0.00	3.68	84.95	11.37
Sandusky MSA	0.50	1	0.70	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	24.16	61.49	14.35
Toledo MSA	0.93	3	2.1	0.00	33.34	33.33	33.33	0	0	0	0	0	0	7.02	20.24	45.82	26.91

Table 1. Lending Volume

LENDING VOLUME		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Chicago IL MSA	92.12	753	146,634	873	236,907	23	4,692	31	112,544	1,679	500,777	94.14
Limited Review:												
Lake County MSA	7.88	63	10,490	78	20,693	0	0	0	0	141	31,183	5.86

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total **	% Owner Occ ***	% BANK Loans ***	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago IL MSA	229	93.47	2.65	6.11	15.37	11.79	44.30	55.46	37.68	26.64	0.23	0.67	0.16	0.34	0.13
Limited Review:															

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2012.

*** Deposit Data as of June 26, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**** Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Lake County MSA	16	6.53	1.19	0.00	16.35	0.00	36.62	68.75	45.84	31.25	0.19	0.00	0.00	0.31	0.12
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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
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:																
Chicago IL MSA	22	91.67	2.65	4.55	15.37	4.55	44.30	45.45	37.68	45.45	0.23	0.37	0.00	0.22	0.29	
Limited Review:																
Lake County MSA	2	8.33	1.19	0.00	16.35	0.00	36.62	100.00	45.84	0.00	0.17	0.00	0.00	0.44	0.00	

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
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:																
Chicago IL MSA	501	91.76	2.65	1.20	15.37	8.18	44.30	49.10	37.68	41.52	0.19	0.18	0.22	0.28	0.13	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Limited Review:															
Lake County MSA	45	8.24	1.19	0.00	16.35	4.44	36.62	53.33	45.84	42.22	0.14	0.00	0.00	0.26	0.09

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Chicago IL MSA	1	100.00	11.66	0.00	24.30	0.00	35.55	100.00	28.49	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Lake County MSA	0	0.00	6.09	0.00	34.70	0.00	36.12	0.00	23.10	0.00	0.00	0.00	0.00	0.00	0.00	

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans****	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
Chicago IL MSA	869	91.76	3.51	1.38	13.90	11.97	37.25	42.81	45.12	43.84	0.34	0.30	0.38	0.40	0.30	
Limited Review:																
Lake County MSA	78	8.24	0.86	0.00	12.94	8.97	32.41	26.92	53.80	64.10	0.31	0.00	0.38	0.23	0.36	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography				
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:																
Chicago IL MSA	23	100.00	1.40	0.00	9.99	0.00	45.72	39.13	42.89	60.87	3.96	0.00	0.00	3.47	5.17	
Limited Review:																
Lake County MSA	0	0.00	1.05	0.00	19.04	0.00	39.66	0.00	40.25	0.00	0.00	0.00	0.00	0.00	0.00	

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share				
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 ⁴	% BANK Loans*	% Families***	% BANK Loans**	% Families***	% BANK Loans**						
Full Review:																
Chicago IL MSA	229	93.47	21.02	21.43	17.57	30.80	21.95	24.11	39.46	23.66	0.26	0.53	0.32	0.23	0.15	
Limited Review:																

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2011).

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Lake County MSA	16	6.53	17.00	18.75	17.25	50.00	22.01	0.00	43.75	31.25	0.22	0.20	0.49	0.00	0.19
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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans*	% Families ⁵	% BANK Loans***	% Families***	% BANK Loans*	% Families***	% BANK Loans**						
Full Review:																
Chicago IL MSA	22	91.67	21.02	31.82	17.57	18.18	21.95	22.73	39.46	27.27	0.25	0.36	0.11	0.26	0.28	
Limited Review:																
Lake County MSA	2	8.33	17.00	50.00	17.25	50.00	22.01	0.00	43.75	0.00	0.19	1.37	0.00	0.00	0.00	

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011			Market Share		
Assessment	Total Home Mortgage Refinance Loans	Low-Income Borrowers	Moderate-Income Borrowers	Middle-Income Borrowers	Upper-Income Borrowers	Overall	Low	Mod	Mid	Upp

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

⁵ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

* Based on 2011 Peer Mortgage Data (USPR)

Area:	#	% of Total**	% Families**	% BANK Loans***	% Families ⁶	% BANK Loans**	% Families*	% BANK Loans**	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago IL MSA	501	91.76	21.02	10.87	17.57	14.07	21.95	28.14	39.46	46.91	0.22	0.44	0.17	0.29	0.18
Limited Review:															
Lake County MSA	45	8.24	17.00	8.89	17.25	26.67	22.01	13.33	43.75	51.11	0.17	0.19	0.39	0.10	0.16

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

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

**** As a percentage of loans with borrower income information available. No information was available for 5.9% of loans originated and purchased by bank.

⁶ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011				Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago IL MSA	873	91.80	65.02	31.16	40.89	24.05	35.05	0.34	0.30
Limited Review:									
Lake County MSA	78	8.20	66.77	38.46	38.46	28.21	33.33	0.31	0.32

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2011				Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011			
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:									
Chicago IL MSA	23	100.00	94.90	56.52	39.13	21.74	39.13	3.96	2.87

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** 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 8.31% of small loans to businesses originated and purchased by the bank.

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 8.70% of small loans to farms originated and purchased by the bank.

Limited Review:									
Lake County MSA	0	0.00	93.93	0.00	0.00	0.00	0.00	0.00	0.00

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: ILLINOIS									
Evaluation Period: JANUARY 1, 2010 TO JUNE 17, 2013									
Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago IL MSA	0	0	79	3,150	79	3,150	99.78	0	0
Limited Review:									
Lake County MSA	0	0	10	7	10	7	0.22	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: ILLINOIS																	
Evaluation Period: JANUARY 1, 2010 TO JUNE 17, 2013																	
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			
				Lo w	Mod	Mid	Upp			Lo w	Mod	Mid	Upp	Lo w	Mod	Mid	Upp
Full Review:																	
Chicago IL AA	92.49	39	89.13	2.56	15.39	33.33	48.72	1	8	0	0	-3	-4	8.04	23.84	38.60	29.51
Limited Review:																	
Lake County IL AA	7.51	5	10.87	0.00	0.00	60.00	40.00	1	1	0	0	0	0	2.76	24.34	33.68	39.23

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

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

Table 1. Lending Volume

LENDING VOLUME 2011		Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31,				
Assessment Area (2011):	% 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:												
Lawrence County PA	100.00	872	81,217	63	9,987	0	0	4	1,368	939	92,572	100.00

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2011		Geography: PENNSYLVANIA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31,					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Lo w	Mod	Mid	Upp
Full Review:															
Lawrence County PA	447	100.00	2.17	0.67	6.94	8.50	73.60	66.44	17.29	24.38	20.39	0.0 0	27.2 7	18.3 8	25.1 4

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2012.

*** Deposit Data as of June 26, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**** Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 31, 2011		Geography: PENNSYLVANIA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
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:															
Lawrence County PA	45	100.00	2.17	2.22	6.94	11.11	73.60	77.78	17.29	8.89	2.87	0.00	10.00	3.05	0.00

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 2011		Geography: PENNSYLVANIA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
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:															

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Lawrence County PA	380	100.00	2.17	0.00	6.94	3.42	73.60	70.00	17.29	26.58	15.60	0.00	30.43	15.86	13.82
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Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY DECEMBER 31, 2011		Geography: PENNSYLVANIA								Evaluation Period: JANUARY 1, 2008 TO					
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:															
Lawrence County PA	0	0.00	19.59	0.00	26.45	0.00	28.99	0.00	24.97	0.00	0.00	0.00	0.00	0.00	0.00

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011		Geography: PENNSYLVANIA								Evaluation Period: JANUARY 1, 2008 TO					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															

* Based on 2011 Peer Mortgage Data (USPR)

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

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

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2011).

Lawrence County PA	63	100.00	7.48	6.35	9.01	22.22	60.73	63.49	22.78	7.94	1.49	3.08	3.00	1.7 9	0.00
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Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS 31, 2011			Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ⁷				
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Lawrence County PA	0	0.00	0.77	0.00	1.92	0.00	77.78	0.00	19.54	0.00	0.00	0.00	0.00	0.00	0.00

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 31, 2011			Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ⁷				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ⁷	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans ^{**}	Overa II	Low	Mod	Mid	Upp
Full Review:															
Lawrence County PA	447	100.00	18.03	18.57	19.37	30.65	23.21	23.04	39.39	27.74	21.70	26.09	22.99	20.37	20.00

⁷ Based on 2011 Peer Small Business Data -- US and PR

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

^{***} Source Data - Dun and Bradstreet (2011).

⁷ Based on 2011 Peer Mortgage Data (USPR)

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

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

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

⁷ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT DECEMBER 31, 2011			Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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 ⁸	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans ^{***}	Overall	Low	Mod	Mid	Upp
Full Review:															
Lawrence County PA	45	100.00	18.03	6.67	19.37	31.11	23.21	22.22	39.39	40.00	2.94	0.00	3.45	1.89	4.35

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2011			Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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 ⁹	% BANK Loans ^{**}	% Families ^{**}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															

^{*} Based on 2011 Peer Mortgage Data (USPR)

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

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

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

⁸ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^{*} Based on 2011 Peer Mortgage Data (USPR)

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by bank.

⁹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Lawrence County PA	380	100.00	18.03	6.68	19.37	19.52	23.21	32.09	39.39	41.71	16.52	22.5 8	21.0 2	18.3 2	13.2 4
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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011		Geography: PENNSYLVANIA			Evaluation Period: JANUARY 1, 2008 TO				
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:									
Lawrence County PA	63	100.00	68.07	47.62	65.08	14.29	20.63	1.49	2.44

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2011		Geography: PENNSYLVANIA			Evaluation Period: JANUARY 1, 2008 TO				
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:									

^{*} Based on 2011 Peer Small Business Data -- US and PR

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

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.59% of small loans to businesses originated and purchased by the bank.

^{*} Based on 2011 Peer Small Business Data -- US and PR

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

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

^{****} 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.

Lawrence County PA	0	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00
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Table 14. Qualified Investments

QUALIFIED INVESTMENTS 2013		Geography: PENNSYLVANIA				Evaluation Period: NOVEMBER 17, 2008 TO JUNE 17,			
Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Lawrence County PA	0	0	30	50	30	50	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2008 TO JUNE 17, 2013			
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			Lo w	Mod	Mid	Up p	Lo w	Mod	Mid	Upp						
Full Review:																							
Lawrence County PA	100.00	4	100.00	0.00	25.00	50.00	25.00	0	0	0	0	0	0	4.26	9.29	68.72	17.73						

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

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