



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

KeyBank, N.A.
Charter Number: 14761

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Cleveland, Ohio 44114

Office of the Comptroller of the Currency

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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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Overall CRA Rating

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

The following table indicates the performance level of **KeyBank, N. A. (Key)** with respect to Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

Key’s lending performance is excellent.

- Borrower distribution is good in all three primary rating areas. Geographic distribution is good in two primary rating areas and adequate in one.
- Home Mortgage Disclosure Act (HMDA) loan distribution by borrower is excellent in one primary rating area and good in the two remaining areas. Distribution of small loans to businesses is adequate in all three primary rating areas. HMDA geographic distribution is good in two of the primary ratings areas and adequate in the third. Distribution of small loans to businesses is excellent in two primary rating areas and good in the third primary rating area. Lending volumes are adequate for both HMDA and small business loans.
- Community development (CD) lending is significantly positive and enhances the bank’s lending performance to excellent in two primary rating areas. Our elevated ratings are based on the significance of CD volume, innovativeness, complexity, and level of responsiveness by the bank to the community needs. Also, lending performance in two of 13 non-primary rating areas is elevated to excellent based on significant CD lending.

Key’s investment performance is good.

- Key has a good volume of qualified community development investments and grants. Investment performance is excellent in one primary rating area and good in another. Performance in the third primary rating area is adequate. The excellent performance in

limited-scope Assessment Areas (AAs) had a positive impact on overall performance in the rating area.

- Key demonstrates good responsiveness to community needs for affordable housing primarily through the purchase of Low Income Housing Tax Credits (LIHTC). These types of transactions are the foundation of Key's investment strategy. LIHTC provide affordable housing to low- and moderate-income individuals, and are offered through Key Community Development Corporation (KCDC), a Key affiliate. To a lesser degree, Key responds favorably to community needs for revitalization and stabilization of low- and moderate-income neighborhoods.
- Key makes significant use of complex investments through LIHTC that routinely involve collaborative efforts among numerous funding sources including: government entities, private equity funds, financial institutions and other private investors. These investments are responsive to affordable housing and revitalization and stabilization needs throughout Key's AAs. We did not identify any investments that are considered innovative. However, Key's community development investment opportunities, particularly LIHTC opportunities were limited in Alaska, Connecticut, Florida, Michigan, and New York.

Key's service performance is excellent.

- Delivery systems are readily accessible to all portions of the institution's AAs. Branch distribution is excellent in the three primary rating areas. Access to banking facilities and services is enhanced in primary rating areas by offices located in middle- income geographies that are in close proximity (i.e. generally located across the street) to moderate-income geographies.
- Key's record of opening and closing branch offices has improved the accessibility of delivery systems in low- and moderate-income geographies. Within the primary rating areas, branch hours do not vary in a way that inconveniences portions of the AAs, particularly low- and moderate-income geographies. Key offers similar products and services throughout its branch network. In addition, some of the products are tailored for low- and moderate-income geographies and individuals. In one of the primary rating areas, consumer advocates consider the bank's alternate payday lending product a model for other banks. We gave this positive consideration in determining the service test rating.
- Key offers a relatively high level of CD services in its primary rating areas. The bank provides excellent CD services and leadership in its largest primary rating area. In the remaining primary rating areas, the bank provides a good level of CD services.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KeyBank, National Association (Key) is the banking subsidiary of KeyCorp; both are headquartered in Cleveland, Ohio. As of June 30, 2011, Key had assets totaling \$86 billion. KeyCorp is a large, bank-based financial service company with consolidated assets of approximately \$89 billion. KeyCorp assets include a wide range of retail and commercial banking, commercial leasing, consumer financing, and investment banking products and services to individual, corporate and institutional clients. Key is an interstate bank with a retail banking footprint that includes fourteen states: Alaska, Colorado, Connecticut, Florida, Idaho, Indiana, Maine, Michigan, New York, Ohio, Oregon, Utah, Vermont, and Washington. Key's most significant presences are in Ohio, New York, and Washington. Key has 1,083 branch offices, a telephone banking call center group, and network of 1,582 automated teller machines (ATMs).

Key's strategic focus is corporate and relationship banking, with efforts shifting toward increasing retail mortgage lending. Key is structured into two primary lines of business (LOB); Key Community Bank (KCB) and Key National Banking. KCB provides consumer services, as well as business banking activities involving retail products and services. KCB is responsible for CRA related activities (e.g. small business loans, HMDA loans and community development lending). KCB also includes the Community Development Banking division whose efforts target low- and moderate-income communities. Key Community Development Corporation (KCDC), a subsidiary of Key and division of Community Development Banking, provides debt and equity financing for affordable housing, and community and economic development revitalization projects.

Key originates mortgage, home equity, and installment loans including auto, unsecured, and secured. As of June 30, 2011 total loans were \$54 billion. Tier 1 Capital was \$9.7 billion. The lending portfolio mix consists of approximately 40% real estate (primarily residential), 25% commercial, 18% consumer, 16% government and 1% agricultural. Key uses a non-affiliated third party to originate purchase money mortgages. The third party relies on underwriting criteria developed by the bank. Key did not purchase any loans during this CRA evaluation period. The bank has deemphasized indirect or non-footprint consumer activities and discontinued recreation and student loan lending since our last CRA Evaluation.

This CRA analysis includes banking activities from one bank acquisition that occurred during the review period in 2008, Union State Bank. Through this acquisition, the bank entered new markets in Stamford, Connecticut and New York County, New York. In addition, the bank expanded its presence in New York's Orange County.

The last CRA Examination is dated July 1, 2008. The bank received an "Outstanding" rating at that examination.

Description of the Evaluation

Evaluation Period/Products Evaluated

Reported HMDA loans and small business/small farm loan originations were evaluated from January 1, 2008 through June 30, 2011. Key did not purchase any loans during this period. Investments, retail and CD activities (loans and services) were evaluated from July 1, 2008 through September 30, 2011.

Key makes very few multifamily real estate loans. As a result, we did not analyze this product. With the exception of three markets, Key makes few small farm loans. The three markets that contained small farm loans received a farm loan analysis. Nevertheless, because farm loan volumes are limited when compared to aggregate lending activity, these results did not impact the Lending Test rating.

We utilized 2010 Mortgage and Small Business Peer Data to evaluate the bank's lending market share. For deposit information, we utilized the most recent Federal Deposit Insurance Corporation Deposit Market Share Reports as of June 30, 2011.

Selection of Areas for Full-Scope Review

We completed a full-scope review for one AA in each state where Key maintains an office. The selected AA was typically the metropolitan statistical area (MSA) or metropolitan division (MD) that contained the largest percentage of Key deposits within the state. Refer to the "Description of Institution's Operations" section under each State Rating for details regarding how the areas were selected. In addition, we completed a full-scope review in every multistate metropolitan statistical area where the bank has branches in more than one state.

Ratings

Key's overall rating is a blend of state and multistate metropolitan area ratings. Three primary rating areas carried the greatest weight in our conclusions. These areas represent the bank's most significant markets with respect to deposit concentrations. In order of significance, the states are Ohio, New York, and Washington. On a consolidated basis, these areas account for 70% of total bank deposits.

State ratings are primarily based on conclusions reached in those areas that received full-scope reviews, but with consideration also given to bank performance in areas receiving limited-scope reviews.

During the review period, the national economy experienced extensive volatility. This was triggered by a liquidity crisis within the financial industry. The housing industry was blighted by sub-prime mortgages which involved low-quality mortgages and non-traditional underwriting. Home refinancing became more difficult as U.S. house sales prices began a steep decline after peaking in mid-2006. In addition, mortgage delinquencies soared when adjustable-rate mortgages reset to higher interest rates thereby causing higher monthly payments. Borrower financing was also jeopardized by high-debt which aided in a general tightening of the credit

market. Housing, especially affordable housing, was adversely impacted by high foreclosure, abandonment, and vacancy rates. Credit availability to low-income borrowers became further strained and limited financing. The volume of foreclosures, evictions, and prolonged vacancies spiked within a short time frame. Further, personal wealth deteriorated precipitously; the time period was comparable in devastation to the Great Depression. These conditions had global ramifications, negatively impacting financial markets in nearly all developed countries. As such, the economic environment is a substantive performance context factor for this bank.

Data Integrity

During the review period, we tested the accuracy of lending data used by the bank to evaluate its CRA performance, including HMDA and small business loans. We also reviewed the eligibility of the CD activity including investments, loans, and services. We found that lending and CD data are accurate.

Community Contacts

We reviewed information from contacts made during the evaluation period. Contacts were made with a variety of groups and organizations in order to identify financial and credit needs, as well as opportunities within Key's full-scope AAs. Of the 32 contacts made, 24 interviews were conducted specifically for this evaluation. Interviews were conducted with low-income housing specialists, community and economic development organizations, community action groups, small business development organizations, and social service groups. Comments are included as appropriate in our performance context considerations. Information from community contacts for the Primary Rating Areas is summarized in the Community Profiles found in Appendix C.

Other Information

Assessment Areas – We determined that all AAs consisted of whole geographies.

Lending Gap Analysis – We reviewed lending in low- and moderate-income geographies throughout the full-scope AAs. We did not identify any unexplained conspicuous lending gaps. We identified several AAs that contained clusters, or isolated low-or moderate-income geographies in which Key did not originate HMDA loans or small loans to businesses. However, there were plausible contributing factors including the general tightening of credit and underwriting standards that resulted from the mortgage meltdown. Additionally, available mortgage demographic data showed several lending impediments including: high percentages of low-income families living at or below poverty levels, high housing costs, and low percentages of owner-occupied housing. These issues limited lending opportunities. For small businesses, demographic data showed a significant number of small businesses located in distressed neighborhoods. This was an impediment to small business lending efforts due to limited lending opportunities. We reviewed summary reports and maps, and analyzed Key's HMDA loans and small loans to businesses over the evaluation period in order to identify any lending gaps in the geographic distribution of loans.

Inside/Outside Ratio – As part of our lending performance evaluation, we gave positive consideration to the substantive volume of loans made inside Key's AAs. We analyzed the volume

of loan originations within the bank's AAs at the bank level. Our conclusions are based solely on bank originations and did not include any affiliate data.

Key originated the majority of its loans within the AA including 92% HMDA, 94% small loans to businesses, and 77% of small loans to farms. Combined, 92% of all reported loans were made within the bank's AAs.

Flexible Lending Programs – We reviewed Key's array of flexible lending programs as part of our evaluation of lending performance. These programs demonstrate Key's commitment to meeting affordable housing needs. Nevertheless, the volume of loans generated by these programs is not substantial and the overall impact to Lending Test ratings is neutral. Key has several flexible lending programs. Key Community Mortgage provides optional mortgage financing for low- and moderate-income homebuyers and geographies. The product allows a loan to value of up to 100% for purchases, and up to 90% for rate and term refinancing. Eligible properties are one to two family units. No private mortgage insurance is required. Also, homebuyer counseling is provided as part of the home purchase process.

Key's Home Assist program targets low- and moderate-income families in low- and moderate-income geographies. It includes flexible credit and underwriting features such as no credit scoring, low down payment (3%) including gift funds, a fixed interest rate, and financing terms of up to 30 years. No private mortgage insurance is required. The program also offers homebuyer counseling.

Key participates in the Federal Home Loan Bank's "Welcome Home Program." This program is designed to assist with homeownership creation. It is funded through a designated portion of Affordable Housing Program grant monies. These monies (maximum of \$5,000 per homebuyer) are used to fund down payments and closing costs incurred in conjunction with the purchase of owner-occupied housing. Housing must be used as a primary residence for low- and moderate-income homebuyers. During the review period, there were a total of 171 grants totaling \$720,500.

In addition, Key's flexible lending is primarily provided through participation with various local and state government housing programs. The most voluminous activity is noted in the state of Ohio, within the Cleveland AA. Additional details are noted in the narrative provided for each full-scope rating area.

Description of factors considered in our analysis under each performance test

Lending Test

HMDA loans are the bank's primary lending product. These loans represent the majority of the bank's lending volume in all primary rating areas that received a full scope review. Small business loans represented half of the volume of HMDA loans and were considered secondarily in weighing lending performance. Within HMDA, we gave equal weighting to home refinance loans and home purchase loans because home refinance loans had the highest volume and the purchase of affordable housing is identified as a community credit need. We gave consideration to home improvement loans depending on the significance of volume when compared to the primary HMDA products. Small loans to farms are not a significant product line and received little consideration in the overall lending test weighting.

Our evaluation does not include an analysis or conclusion in markets where a loan product had fewer than 50 originations. We found that performing an analysis for fewer than 50 loans does not provide meaningful conclusions. In several non-primary rating areas, loan originations are low. In evaluating the bank's lending performance, we gave equal weighting to geographic and borrower distribution. In several markets with substantive CD loan volumes coupled with the positive responsiveness of those loans to community needs; we elevated the preliminary Lending Test ratings. These elevations are described in conclusions under each state or multistate as appropriate.

In our geographic distribution analysis, we gave greater consideration to the bank's performance in moderate-income geographies. These geographies contained the majority of owner-occupied housing units. In a few instances, we considered the challenges that Key encountered in attempting to lend within low-income geographies with very low percentages of owner-occupied housing units. In the Cleveland AA, we considered the high number of foreclosures and accompanying detrimental impact to home values.

In our evaluation of borrower distribution, we considered the impact that poverty levels have on low-income individuals' ability to afford a home. We also considered the high cost and overall affordability of housing in some markets; and difficulty that low- or moderate-income applicants have in qualifying for home loans in those markets.

Investment Test

During the examination period, several factors occurred that influenced the bank's investment activities, including Fannie Mae's and Freddie Mac's withdrawal from the LIHTC market in 2008 and 2009. Their exit from the market reduced the number of LIHTC projects available for investment. Additionally, during this time, the United States Congress created the Tax Credit Assistance Program which converted 40% of the LIHTC allocation for each state to a direct grant for projects. This action reduced the volume of LIHTC investment opportunities, particularly in the Albany AA. Finally, Key incurred operating losses throughout the exam period that negatively impacted its ability to fully utilize tax credits.

We gave primary consideration to the volume of investments made during the current evaluation period. We also considered the continuing impact of prior period investments; qualitative factors affected the weight given to both current and outstanding prior period qualified investments. Investment performance in the limited-scope areas are also considered that could potentially impact the state investment test rating. Additionally, consideration is given to the impact from statewide investments with potential to benefit the bank's AAs. We gave minimal consideration to qualified investments made at the broader regional areas that includes the bank's AAs.

Service Test

In evaluating service test performance, primary consideration is given to Key's performance in delivering retail products and services to individuals and geographies of different income levels throughout its AAs. Focused is placed on branches in low- and moderate-income geographies. In the primary rating areas, we also considered branches in middle-income areas that are located

near moderate-income areas. We analyzed deposit-taking ATM distribution, and gave positive consideration when access to banking services was enhanced for low- or moderate-income persons or geographies.

When Key opened or closed branches within an AA, we evaluated the overall impact of the changes. We evaluated the range of services and products offered by all of Key's branches; focusing on differences in branch hours and services in low- and moderate-income geographies compared to those in middle- or upper-income geographies.

We considered the existence of alternative delivery systems. In addition to ATMs, Key offers numerous alternate delivery options including 24-hour online banking, banking by mail, and banking by phone. Key also offers a mobile banking application for web-enabled mobile device usage. These options provide customers with increased convenience and flexibility in accessing, selecting, and using financial services. Alternative services are offered to all customers, and are available throughout Key's markets. They benefit, but do not necessarily target low- and moderate-income individuals or areas. As a result, we did not give these alternative systems significant weighting within our conclusions.

We evaluated the bank's record of providing CD services in full-scope AAs; and its responsiveness to the needs of the community. Services that reflected ongoing relationships with organizations involved in CD activities received the greatest consideration in our analysis.

Key offers a variety of CD services that are noteworthy. A few examples include:

- Key employees represented the institution and provided several thousand hours of technical assistance activities to a wide variety of community development organizations. Some of the services include: routinely serving as chairpersons for loan review and funding committees, assisting in marketing of financial services through participating and development of workshops and conferences, developing financial policies and other application documentation, and providing accounting services.
- Development of Financial Education Centers in Ohio and Albany. These centers are used, in addition to numerous offsite venues, to provide free financial education classes. The classes primarily target the financial education needs of low- and moderate-income persons with average incomes of \$25,000 per year; and focus on techniques for debt reduction, and establishing financial capacity and savings in order to qualify for affordable housing and other consumer loans, and to regain deposit account privileges. During the review period, over 13,000 individuals participated in both onsite and offsite courses, most of which were taught by Key employees.
- Expansion of its annual "Super Refund Saturday" initiative which provides free tax preparation services, primarily to low- and moderate-income communities. The program targets households who meet specified income restrictions and qualify for Earned Income Tax Credits (EITC). During the review period, 808 Key employees assisted in completing over 4,000 tax returns that resulted in EITCs greater than \$4 million. Statistics indicate that nearly 20% of households eligible for the EITC do not claim them.

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.

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

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.

Primary Rating Areas

State of Ohio

CRA Rating for Ohio: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

Major factors that support this rating are primarily based on performance in the full scope Cleveland AA, and include:

- Excellent Lending Test performance based on good geographic and borrower distributions and adequate lending activity. Consideration is given to Key’s stronger lending activity in low-income geographies (home purchase and home improvement) where high property abandonment and declining home values have occurred. CD lending is responsive to community needs, innovative, complex, and has a significantly positive impact that elevates Key’s overall lending performance to Outstanding.
- Excellent Investment Test performance based on excellent responsiveness to the identified needs in the assessment area, and excellent volume of current and prior period qualified investments.
- Excellent Service Test performance based on good branch distribution. This performance is elevated to excellent by the existence of branches in middle-income geographies that are easily accessible to individuals living in moderate-income geographies. Key’s record of opening branches also improves accessibility of delivery systems in moderate-income geographies. ATM distribution is excellent as well as the level of CD services.

Description of Institution’s Operations in Ohio

Key has 223 branches and 385 full service ATMs in the state of Ohio. The bank has delineated seventeen AAs within the state. The AAs include ten MSAs and seven non-MSAs. Statewide, the bank has \$18 billion in deposits. This represents 30.2% of aggregate bank deposits. Ohio is the largest rating area for Key. Within Ohio, 60.6% of the bank’s deposits are concentrated in the Cleveland-Elyria-Mentor MSA (Cleveland AA). As a result, the Cleveland AA received a full-scope review; and carried the greatest weight in Ohio’s state performance ratings. The remaining MSAs and the combined non-MSA were analyzed using limited-scope procedures.

In addition to these areas, Key has Ohio offices located in the Cincinnati-Middletown, OH-KY-IN multistate AA. Deposits from this area are not included in the state of Ohio deposit totals noted above. The multistate is analyzed separately.

Ohio, particularly within low-income areas, was severely impacted by foreclosures and declining home values during the review period. The state continues to be ranked among the top 10 “highest foreclosure rate” states. The Cleveland AA includes many of the state’s inner-city

neighborhoods that are particularly blighted with a large number of vacant, repossessed homes. One such neighborhood was mentioned in a national listing as being 51st among the top 100 zip codes in the United States hardest hit by foreclosures. We took these facts into consideration in assessing the bank's lending activity, and overall lending performance.

In addition, Key has placed large volumes of corporate-wide deposits in the Cleveland AA (\$3.3 billion). The deposits include those owned by broker dealer clients, as well as commercial trading accounts. The broker customers or commercial business units are located throughout the United States. Key does not track the deposits by branch location or city. As a result of these factors, only \$7.6 billion of reported Cleveland AA deposits originate from within the AA, and actually reflect core consumer deposits from this market. We considered this factor in our review of lending activity and community development loans.

Refer to the market profile in Appendix C for performance context information for the Cleveland-Elyria-Mentor MSA.¹

LENDING TEST

Key's overall Lending Test performance in Ohio is Outstanding. Based on a full-scope review, performance in the Cleveland AA is good. CD lending is responsive, complex, innovative, and has a significantly positive impact that elevates lending test performance. In addition, the volume (\$62 million) and high responsiveness (affordable housing) of statewide/regional CD loans further addresses Ohio AA lending needs; over 90% (\$56 million), have an immediate, direct impact on Key's AAs. Performance in the limited scope AAs does not impact the Lending Test rating in Ohio.

Refer to Tables 1 through 12 in the state of Ohio section and CD Additional Activity Table in appendix D for facts and data used to evaluate the bank's lending performance.

Conclusions for Area Receiving Full-Scope review

Lending Activity – Key's lending activity in the Cleveland AA is adequate given its corporate banking focus and highly competitive market. We also considered performance context issues related to mortgage foreclosures and declining home values in low-income neighborhoods; Key's strongest lending activity occurred in these areas. Key leads the market in deposit holdings with a 21.7% deposit market share among 43 depository institutions; this volume includes corporate deposits discussed as part of performance context issues. The bank ranks eighteenth in overall home mortgage lending with a 1.97% market share in an area that includes 362 lenders. In home purchase lending, Key ranks twentieth overall with a 1.2% market share. Key's home purchase lending performance in low-income tracts is significantly stronger; the bank has a market share of 6.6% and ranks third. The bank ranks twenty-third overall in home refinance lending with a 1% market share. In low-income tracts the bank ranks 15th with a .9% market share. Key ranks second in home improvement lending with a 13.0% market share. Key has a 21% market share in low-income tracts where the bank also ranks 2nd.

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

For small business loans, Key ranks sixteenth with a 1.4% market share among 87 lenders. One major credit card company dominates the market with a 24% market share.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is good based on good distribution of HMDA loans and excellent distribution of small loans to businesses.

Distribution of home purchase loans is excellent. The percentage of home purchase loans in low- and moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies. Home purchase market share in those geographies significantly exceeds overall home purchase market share.

Distribution of home refinance loans is poor. The percentage of home refinance loans in both the low- and moderate-income geographies is significantly less than the percentage of owner-occupied housing units in those geographies. However, the performance in low-income geographies is considered adequate given home refinance lending impediments in Cleveland's low-income neighborhoods. Extremely high foreclosure rates, property abandonment, and recessed home values impaired Key's ability to refinance homes. Home refinance market share in low-income geographies is near to its overall home refinance market share, and adds support to performance in those geographies. Home refinance market share in moderate-income geographies is significantly less than overall home refinance market share.

Distribution of home improvement loans is excellent. The percentages of home improvement loans in low- and moderate-income geographies significantly exceed the percentage of owner-occupied housing units in those geographies. Home improvement market share in low-income geographies significantly exceeds, and in moderate-income geographies is near to overall home improvement market share.

Distribution of small loans to businesses is excellent. The percentages of small loans to businesses made in low- and moderate-income geographies are near to, and exceed the percentage of businesses in those geographies, respectively. Small loan to business market shares in low- and moderate-income geographies exceed overall small business market share.

Distribution of Loans by Income Level of the Borrower – The overall borrower distribution of loans is good based on an excellent HMDA loan distribution and an adequate distribution of small loans to businesses. In analyzing the bank's performance to low-income borrowers we considered the high percentage of households living at or below poverty which constricts lending to low-income borrowers.

Distribution of home purchase loans is excellent. The percentages of home purchase loans made to low- and moderate-income borrowers exceed the percentage of those families living in the AA. Home purchase market shares to low- and moderate-income families exceed overall home purchase market share.

Distribution of home refinance loans is adequate. The percentage of home refinance loans made to low-income borrowers is significantly less than the percentage of those families living in the AA. However, performance is adequate considering performance context issues described above.

Also, the bank's refinance market share positively impacts its overall refinance lending performance. The percentage of home refinance loans made to moderate-income borrowers is near to the percentage of those families living in the AA. Home refinance market share to low-income families exceeds, and to moderate-income families is near to overall home refinance market share.

Distribution of home improvement loans is excellent. The percentages of home improvement loans made to low- and moderate-income borrowers exceed the percentage of those families living in the AA. Home improvement market share for low-income families is less than, and for moderate-income families, is near to overall home improvement market share. Distribution of small loans to businesses is adequate. The percentage of small loans to businesses with revenues of \$1million or less is less than the percentage of small businesses in the AA. The market share of small loans to businesses exceeds overall small business market share.

Community Development Lending (CD) – CD lending has a significantly positive impact on the lending test rating and lending performance in the AA. Key made 50 CD loans totaling \$141 million during the review period. CD lending activity is innovative, complex and responsive to the needs of the community including revitalization and stabilization (60% of loans) and affordable housing (40% of loans). When the context issue discussed above is considered (e.g. the high volume of deposits originated from outside the AA that significantly impacts AA allocated Tier 1 Capital), the volume of CD lending is excellent and has a significantly positive impact. Additionally, the Cleveland AA benefits from two statewide CD loans totaling \$59 million to an organization that supports affordable housing, and targets low and moderate income persons throughout the state of Ohio. Of the \$59 million, \$7.8 million has an immediate, direct impact on the Cleveland AA.

Key originated four complex or innovative CD loans totaling \$18.5 million. Two of the loans involve partnerships with local organizations and the use of flexible lending criteria to facilitate use of, a new funding initiative, Neighborhood Stabilization Program (NSP). The remaining loans showcase Key's involvement as a leader in home financing for low-income, chronically homeless persons.

Examples of CD lending include:

- Key originated a \$3 million construction loan to a developer to acquire and rehabilitate single family homes as part of a neighborhood stabilization project. Key was one of the first Cleveland AA banks to facilitate NSP fund usage through partnerships with local developers and use of flexible lending criteria. NSP funding was new to the Cleveland AA during the review period, and its use is considered innovative. This loan served to rehabilitate vacant and abandoned homes in six low- and moderate-income tracts. These focus neighborhoods have been targeted for redevelopment by the city of Cleveland. Complexity is noted in financing which involved four sources, all of which were either directly provided or coordinated by Key. In addition to the \$3 million construction loan, Key utilized a New Market Tax Credit (NMTC), NSP funds, and sponsored a \$140 thousand Federal Home Loan Bank of Cincinnati affordable housing grant.
- Key made two complex CD loans totaling \$10.5 million, to a county sponsored housing organization that provides permanent and supportive housing for low-income, chronically homeless persons. The organization identified Key as a leader in financing and supporting

housing for the chronically homeless. In addition to housing, the project provides mental health and chemical dependency counseling to designated low-income residents, and provides other social services as needed. Complexity is noted in financing which involved more than a half dozen sources, most of which were either directly provided or coordinated by Key. In addition to the \$10.5 million in CD loans, Key invested in LIHTC totaling \$13.7 million, sponsored Federal Home Loan Bank of Cincinnati affordable housing grants totaling \$1.8 million, and provided a \$10 thousand grant.

Product Innovation and Flexibility –Key’s flexible lending is primarily provided through loan participations involving several local and statewide community organizations and local and state governments. In the Cleveland AA, the bank originated 602 loans totaling \$25 million during the review period. Loan purpose is primarily home improvement targeted for low- and moderate-income persons in Cleveland and surrounding cities. Programs include the Housing Enhancement Loan Program, Challenge Fund, Heritage Loan Program, Cleveland Action to Support Housing, and Cleveland Restoration Society. For the entire state of Ohio, Key originated 716 loans totaling \$26 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in Akron, Canton, Columbus, Dayton, Mansfield, Sandusky, Toledo, Youngstown, and non-MSA AAs is weaker than the overall Outstanding performance noted in the state of Ohio. The weaker performance is due to lower geographic and borrower distribution. HMDA and small business loan volumes in the Springfield AA were insufficient for a meaningful analysis and conclusion.

INVESTMENT TEST

Key’s overall Investment Test performance in Ohio is Outstanding. This is primarily based on our full-scope review of performance in the Cleveland AA which is excellent. Key’s level of qualified investments represents excellent responsiveness to the identified needs of the AAs, particularly for affordable housing. Performance in the limited-scope AAs and statewide or regional investments does not impact the Investment Test rating in Ohio.

Refer to Table 14 in the state of Ohio section and Additional Qualified Investments table in Appendix D for facts and data used to evaluate the bank’s level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made 22 investments totaling \$70.5 million and 63 donations totaling \$992 thousand. Key has 71 prior period investments with an outstanding balance of \$32 million as of September 30, 2011. Investments from prior periods continue to impact the full-scope area and provide support for the assigned rating.

Key’s investments are responsive, complex and flexible, and meet the Cleveland’s AA needs for affordable housing and low- and moderate-income neighborhood revitalization and stabilization. As an example, Key held a leadership role in the construction of a 70 unit, single room occupancy building that is part of a LIHTC Permanent Supportive Housing Project. The building is located in

a low- income neighborhood that has one of the highest foreclosure rates in the city of Cleveland; and targets low- and moderate-income single adults who have been homeless and who have disabilities, including mobility or vision impairment. The neighborhood in which the building is located has been targeted for intensive reinvestment through the Strategic Investment Initiative. Funding sources for this project include various financing and leverage sources including the City of Cleveland (\$1.2 million), Cuyahoga County HOME Funds (\$300 thousand), grants (\$2.6 million), private equity (\$1.3 million), and KCDC equity LIHTC (\$6.5 million).

The bank made investments in funds that target regions throughout the State of Ohio and in the broader regional area. These investments, while not directly targeting the bank's AAs, either have the potential to benefit the AAs or the broader statewide or regional areas. Key has one statewide investment with a balance of \$461 thousand from a prior period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Investment Test performance in the Canton, Columbus, Dayton, Springfield, Toledo and Youngstown AAs is not inconsistent with the overall Outstanding performance noted in the state of Ohio. Performance in the Akron, Mansfield, and non-MSA AAs is weaker due to fewer investments. Performance in the Sandusky AA is considered poor due to a lack of investments.

SERVICE TEST

Key's overall Service Test performance in Ohio is Outstanding. Based on a full-scope review, performance in the Cleveland AA is excellent. Performance in the limited-scope AAs does not impact the Service Test rating in Ohio.

Refer to Table 15 in the state of Ohio section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services – Bank branches are readily accessible to all portions of the Cleveland AA. There are eight branches located in low-income geographies and 11 in moderate-income geographies. The percentage of branches located in low-income geographies exceeds the percentage of the population residing in those geographies. In moderate-income geographies, the percentage of branches is near to the population living in those areas. Moderate-income branch distribution is positively impacted by three branches that are located in middle-income census tracts, but are easily accessible (located across the street or within blocks) to adjacent moderate-income geographies. These branches provide an improved level of access to banking services and products for individuals living in moderate-income census tracts. Branch openings and closings have improved access to banking services within moderate-income areas. Key opened 13 offices including three in moderate-income geographies. Key closed four branches including one located in a low-income geography, and one in a moderate-income geography. Services and products offered at branches are consistent throughout the branch network, and are periodically tailored to the needs of the community. Twenty eight branches offer the KeyBank Plus product which

provides an alternative to higher cost check cashing services, and primarily targets the needs of low- and moderate-income customers. In addition, of the 28 branches that offer KeyBank Plus, 17 are located in low- and moderate-income geographies, and three in middle-income geographies that are easily accessible to moderate-income geographies. During the review period, approximately 4,000 customers utilized the product. Also, numerous branches employ staff members who are proficient in languages other than English. These bilingual staff members improve the convenience of accessing products by helping to overcome potential language and cultural barriers. Banking hours do not vary in a way that inconveniences people within the assessment area. The bank offers traditional, extended, and drive thru hours throughout its AA. Access to banking services is enhanced by an excellent distribution of ATMs throughout the AA.

Community Development Services (CD) - Key provides an excellent level of CD services to the AA. A large number of bank employees provide extensive service to the majority of AA community groups whose efforts target identified needs such as affordable housing, economic development, and social services that are directed towards low- and moderate-income people. Bank employees primarily serve in leadership positions as financial managers, financial education instructors, Board of Trustee members, and loan committee members. Key also provides free, onsite financial education services through its Cleveland Financial Education Center. The center primarily targets the financial education needs of low- and moderate-income persons who seek to reduce debts and build or develop financial capacity.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the Akron and non-MSA AAs is not inconsistent with the overall Outstanding performance noted in the state of Ohio. Performance in the Canton, Columbus, Dayton, Mansfield, Sandusky, Springfield, Toledo and Youngstown AAs is weaker due to lower branch distribution in low- and moderate-income geographies.

State of New York

CRA Rating for New York: Satisfactory

The lending test is rated: High Satisfactory
The investment test is rated: Low Satisfactory
The service test is rated: Outstanding

Major factors that support this rating are primarily based on performance in the full scope Albany AA, and include:

- Good Lending Test performance based on adequate lending activity, adequate geographic distribution, and good borrower distribution. In addition, CD lending has a positive impact on overall lending performance.
- Adequate Investment Test performance based on a poor volume of investments. However, several limited-scope AAs that represent a significant portion of the state’s deposits have excellent performance that elevates the overall investment test rating.
- Excellent Service Test performance based on good branch distribution. Performance is enhanced by the existence of branches in middle-income geographies that are easily accessible to individuals living in moderate-income geographies. Positive consideration is given for retail services that are tailored to meet the financial service needs of low- and moderate-income persons. ATM distribution is good. The bank also provides a good level of CD services.

Description of Institution’s Operations in New York

Key has 234 branches and 334 full service ATMs in the state of New York. The bank delineated twenty-five AAs within the state. The AAs include nine MSAs and sixteen non-MSAs. Statewide, the bank has \$15.9 billion in deposits. This represents 27% of aggregate bank deposits. New York is the second largest rating area for the bank. Within New York, 44% of the bank’s deposits are concentrated in the Albany-Schenectady-Troy MSA (Albany AA). As a result, the Albany AA received a full-scope review, and carried the greatest weight in determining overall performance ratings for New York. The remaining MSAs and combined non-MSA are analyzed using limited-scope procedures.

Refer to the market profile in Appendix C for performance context information for the Albany-Schenectady-Troy MSA.

LENDING TEST

Key’s overall Lending Test performance in New York is High Satisfactory. Based on a full-scope review, performance in the Albany AA is good. CD lending in the Albany AA has a positive impact on lending performance. Performance in limited scope AAs and statewide or regional CD loans do not impact the Lending Test rating in New York.

Refer to Tables 1 through 12 in the state of New York section and the CD Additional Activity Table in Appendix D for the facts and data used to evaluate the bank's lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity –Key's lending activity in the Albany AA is adequate given the bank's corporate banking focus and highly competitive market. Key leads the market in deposits with a 33.1% deposit market share among 27 depository institutions. In overall home mortgage lending, the bank ranks fifteenth with a 1.83% market share in a market which includes 237 lenders. In primary home mortgages, Key ranks twentieth with a 1.3% market share and ranks sixteenth in home refinance lending with a 1.4% market share. Key ranks seventeenth in home improvement lending with a 1.8% market share.

For small business loans, Key ranks twelfth with a 2.09% market share among 59 lenders. One major credit card company dominates the market with a 23.6% market share.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is adequate based on adequate HMDA loan distribution and good small loans to businesses distribution.

Distribution of home purchase loans is excellent. The percentages of home purchase loans in low- and moderate-income geographies are near to the percentage of owner-occupied housing units in those geographies. Home purchase market share in low- and moderate-income geographies exceeds its overall home purchase market share. The excellent market share in moderate-income geographies enhances the lending performance in those geographies.

Distribution of home refinance loans is poor. The percentage of home refinance loans in low-income geographies is less than, and in moderate-income geographies is significantly less than, the percentage of owner-occupied housing units in those geographies. Home refinance market share in low-income geographies exceeds, and in moderate-income geographies is less than overall home refinance market share.

Distribution of home improvement loans is good. The percentage of home improvement loans in low-income geographies exceeds, and in moderate-income geographies is less than the percentage of owner-occupied housing units in those geographies. Key only has home improvement loans market share in moderate-income geographies which is near to its overall home-improvement market share.

Distribution of small loans to businesses is good. The percentage of small business loans made in low- and moderate-income geographies exceeds and is near to the percentage of businesses in those geographies, respectively. Small loans to businesses market shares in low- and moderate-income geographies exceed, and is near to, overall small business market share, respectively.

Distribution of Loans by Income Level of the Borrower – Overall borrower distribution of loans is good based on a good HMDA loan distribution and adequate distribution of small loans to businesses. In analyzing Key's performance to low-income borrowers, we gave consideration to

the high percentage of families living at or below poverty and high housing costs which constricts lending to low-income borrowers.

Distributions of home purchase, home refinance, and home improvement loans are good. The percentage of each home mortgage loan product made to moderate-income borrowers is near to or exceeds the percentage of moderate-income families living in the AA. The percentages of home purchase and refinance loans made to low-income borrowers are significantly less than the percentage of those families living in the AA; however, performance is adequate considering performance context as detailed above. The percentage of home improvement loans made to low-income borrowers is less than the percentage of those families living in the AA, but is good considering performance context.

Home purchase market shares to low- and moderate-income families exceed Key's overall home purchase market share. Home refinance market shares to low- and moderate-income families are less than overall refinance market share. Key only had home improvement market share in moderate-income geographies; it exceeds overall home improvement market share.

Distribution of small loans to businesses is adequate. The percentage of small loans to businesses made to small businesses with revenues of \$1 million or less is adequate. Small loans to business market share exceeds overall small business market share.

Community Development Lending (CD) – CD lending has a positive impact on lending performance in the AA. Key made 18 CD loans totaling \$406 million. CD lending activity includes 89% community services, 9% revitalization and stabilization, and 2% affordable housing.

Examples of CD loans include:

- Key made a \$500 thousand loan to an agency that provides residential housing for developmentally-disabled low-income persons. The agency operates 13 residential housing units and six after school respite programs. Other services provided include personal, recreational, and assisted learning.
- Key made a \$5 million loan to local groups collaborating in a LIHTC project to revitalize a challenged neighborhood that house a number of vacant lots and substandard buildings. The project plan calls for construction of 52 affordable housing units targeted to low- and moderate-income families.

In addition, the bank made two CD loans totaling \$4.7 million within the state of New York, but not located within any of its AAs. While having the potential to benefit one or more of the bank's AAs, these additional CD loans do not impact the overall state rating.

Product Innovation and Flexibility – We did not identify any products offered by Key that are innovative or flexible in this AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the Buffalo, Kingston, New York, Rochester, and Syracuse AAs is not inconsistent with the overall High Satisfactory performance noted for the state of New York. Performance is stronger in the non-MSA AA due to stronger geographic distribution and CD lending. Performance in the Poughkeepsie AA is weaker due to

lower geographic or borrower distribution. HMDA and small business loan volume in the Glen Falls and Utica Rome AAs were insufficient for a meaningful analysis and conclusion.

INVESTMENT TEST

Key's overall Investment Test in New York is Low Satisfactory. Based on a full-scope review, performance in the Albany AA is poor. Excellent performance in six limited-scope AAs is significant at 46% of the state's deposits, and elevates the overall state investment test rating. The poor performance in three limited-scope AAs (2% of deposits) and statewide/regional investments do not impact the Investment Test rating.

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank has six prior period investments (LIHTC) with an outstanding balance of \$14.1 million as of September 30, 2011. While this level of investment is very low, we considered the limited volume of LIHTC investment opportunities within the Albany AA. LIHTC are Key's primary investment vehicle. We also considered the existence of AA investment opportunities with several organizations with a CD purpose. In addition, during the evaluation period, Key made 39 donations totaling \$355 thousand, in the AA.

We considered the impact of prior period investments on Key's overall investment performance in the Albany AA. Key's South End Revitalization LIHTC construction and rehabilitation project (51 units) with the Albany Housing Authority continues to positively impact the Albany AA. The bank made investments in funds that target regions throughout the state of New York and broader regional area. These investments, while not directly targeting the bank's AAs; either have the potential to benefit the AAs or the broader statewide or regional area. Key has four statewide investments with remaining balances of \$12.4 million from a prior period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Investment Test performance in the Buffalo, New York, Rochester, Syracuse, Utica and non-MSA AAs is stronger than the overall Low Satisfactory performance noted for the state of New York. Stronger performance is due to larger investment volume. Performance in Glen Falls, Kingston, and Poughkeepsie AAs is weaker and considered poor due to significantly fewer investments, and lack of current or prior period investments.

SERVICE TEST

Key's overall Service Test performance in New York is Outstanding. Based on a full-scope review, performance in the Albany AA is excellent. Performance in limited scope AAs does not impact the Service Test rating in New York.

Refer to Table 15 in the state of New York section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services - Bank branches are accessible to essentially all portions of the Albany AA, especially those in low-income areas. There are five branches located in low-income geographies and five located in moderate-income geographies. The percentage of the bank's branches located in low-income geographies exceeds the percentage of the population residing in those geographies. In moderate-income geographies, the percentage of bank branches is less than the population living in those areas. However, moderate-income branch distribution is positively impacted by three branches that are located in middle-income census tracts, but are easily accessible (located across the street or within blocks) to adjacent moderate-income geographies. These branches provide an improved level of access to banking services and products for individuals living in moderate-income census tracts.

Branch openings and closings have not adversely affected the accessibility of delivery systems. Key opened one office in an upper income geography. No branches were closed. Services and products are tailored to the needs of the community. Twenty one branches offer the KeyBank Plus product which provides an alternative to higher cost check cashing services, and primarily targets the needs of low- and moderate-income persons. In addition, of the 21 branches that offer KeyBank Plus, nine are located in low- and moderate-income geographies, and three in middle-income geographies that are easily accessible to moderate-income geographies. Key also offers the KeyBasic Credit Line, a small dollar credit product with flexible features. Consumer advocates consider the product a model for other banks. This product offers an alternative to payday lending and primarily targets low- and moderate-income persons. In addition, numerous branches employ staff members who are proficient in languages other than English. These bilingual staff members improve the convenience of accessing products by helping to overcome potential language and cultural barriers. Banking hours do not vary in a way that inconveniences people within the AA. The bank offers traditional, extended, and drive thru branch banking hours throughout its AA. Access to banking services is enhanced by a good distribution of ATMs located within the AA.

Community Development Services (CD) - Key provides a good level of CD services in the AA. Numerous bank employees routinely serve in key financial positions within many AA community groups whose efforts target affordable housing, economic development, and social services for low- and moderate-income families. These areas are identified as AA needs. Key also provides free, onsite financial education services through its Albany Financial Education Center. The center primarily targets the financial education needs of low- and moderate-income persons who seek to reduce debts and build or develop financial capacity.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the Rochester, Syracuse, and non MSA AAs is not inconsistent with the overall Outstanding performance noted in the state of New York. Performance in the Buffalo, Glen Falls, Kingston, New York, Poughkeepsie, and Utica is weaker because of lower branch distribution in low- and moderate-income geographies. The Glen Falls and Kingston AAs do not have low-income geographies.

State of Washington

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

Major factors that support this rating are primarily based on performance in the full scope Seattle AA, and include:

- Excellent Lending Test performance considering adequate lending activity, and good geographic and borrower distributions. In addition, CD lending has a significantly positive impact that elevates Key's overall lending performance rating to Outstanding.
- Good Investment Test performance based on a good volume of qualified investments that are responsive to the identified needs in the assessment area.
- Excellent Service Test performance based on excellent branch and ATM distribution. The bank also provides a good level of CD services.

Description of Institution's Operations in Washington

Key has 162 branches and 265 full service ATMs in the state of Washington. Key delineated twenty AAs within the state. The AAs include ten MSAs and ten non-MSAs. Statewide, the bank has \$8 billion in deposits. This represents 13% of the bank's total deposits. Washington is the third largest rating area for Key. Within Washington, 65% of the bank's deposits are concentrated in the Seattle-Bellevue-Everett MD (Seattle AA). As a result, the Seattle AA received a full-scope review; and it carries the greatest weight in Washington's state performance ratings. The remaining MSAs and combined non-metropolitan AAs are analyzed using limited-scope procedures.

In addition to these areas, Key has offices in the state of Washington portion of the Portland-Vancouver-Beaverton, or - WA multistate AA. Deposits from this area are not included in the state of Washington deposit totals noted above. The multistate is analyzed separately.

Refer to the market profile in Appendix C for performance context information for the Seattle-Bellevue-Everett MD.²

LENDING TEST

Key's overall Lending Test performance in Washington is Outstanding. Based on a full-scope review, performance in the Seattle AA is good. CD lending in the Seattle AA is excellent and

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

elevates overall Lending Test performance to Outstanding. Performance in the limited scope AAs and statewide/regional CD loans did not impact the Lending Test rating for Washington.

Refer to Tables 1 through 12 in the state of Washington section and CD Additional Activity Table in Appendix D for facts and data used to evaluate the bank's lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity – Lending activity in the Seattle AA is adequate given Key's corporate banking focus and the AA's highly competitive market. Key ranks fifth in deposits with an 8.4% deposit market share among 58 depository institutions. In overall home mortgage lending, the bank ranks twenty-fourth with a .73% market share in a market which includes 474 lenders. In primary home mortgages, Key ranks thirty-eighth in home purchase lending with a .46% market share and thirtieth in home refinance with a .54% market share. Key ranks sixteenth in home improvement lending with a 1.7% market share.

For small business loans, Key ranks fifteenth with a .82% market share among 100 lenders. One major credit card company dominates the market with a 21.8% market share. The volume of small farm loans is insufficient to result in a meaningful analysis or conclusion. In our review of Key's distribution of loans throughout the AA; we did not identify any lending gaps.

Distribution of Loans by Income Level of the Geography –The overall geographic distribution of loans is good based on good HMDA loan distribution and excellent distribution of small loans to businesses.

Distribution of home purchase loans is excellent. The percentage of loans made in low-income geographies is near to, and in moderate-income geographies exceed the percentages of owner-occupied housing units in those geographies. Home purchase market shares in low- and moderate-income geographies exceed overall home purchase market share.

Distribution of home refinance loans is good. The percentage of loans made in low-income geographies exceeds and in moderate-income geographies is near to the percentage of owner-occupied housing units in those geographies. Home refinance market shares in low- and moderate-income geographies are less than, and exceeds overall home refinance market share, respectively.

Distribution of home improvement loans is excellent. The percentages of loans made in low- and moderate-income geographies exceed the percentages of owner-occupied housing units in those geographies. Home improvement market share was only reported in moderate-income geographies; and it is near to the overall home improvement market share.

Distribution of small loans to businesses is excellent. The percentages of small loans to businesses in low- and moderate-income geographies exceed the percentage of businesses in those geographies. Small loans to businesses market shares in low- and moderate-income geographies exceed overall small business market share.

Distribution of Loans by Income Level of the Borrower – The borrower distribution of loans is good based on good HMDA loan distribution and adequate distribution of small loans to

businesses. In analyzing the bank's performance to low-income borrowers we gave consideration to the high percentage of households living at or below poverty and the high cost of housing which constricts lending to low-income borrowers.

Distribution of home purchase loans is excellent. The percentage of home purchase loans made to low-income borrowers is less than the percentage of those families living in the AA; however, performance is considered good considering performance context as detailed above. The percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of those families living in the AA. Home purchase market shares to low- and moderate-income families exceed overall home purchase market share.

Distribution of home refinance loans is good. The percentage of home refinance loans made to low-income borrowers is significantly less than the percentage of those families living in the AA; however, performance is adequate considering performance context. The percentage of home refinance loans made to moderate-income borrowers exceeds the percentage of those families living in the AA. Home refinance market shares to low- and moderate-income families exceed overall home refinance market share.

Distribution of home improvement loans is adequate. The percentage of home improvement loans made to low-income borrowers is less than the percentage of those families living in the AA; however, performance is good considering performance context. The percentage of home improvement loans made to moderate-income borrowers is significantly less than the percentage of those families living in the AA. Home improvement market share to low-income families exceeds, and to moderate-income families is significantly less than overall home improvement market share.

Distribution of small loans to businesses is adequate. The percentage of small loans to businesses made to small businesses with revenues of \$1 million or less is adequate. Small loans to businesses market share exceeds overall small business market share

Community Development Lending (CD) – CD lending has a significantly positive impact on the lending test rating and lending performance in the AA. Key made 44 CD loans totaling \$208 million. CD lending activity targets community needs: affordable housing (84% of loans), community services (10% of loans), and revitalization and stabilization (6% of loans). Key's CD activities include:

- A \$3.5 million construction loan to a local corporation to construct 15 townhomes in the central district of Seattle. The target population of the housing is low- and moderate-income families. These affordable housing units are needed because real estate prices are generally high in area. The project is financed using NMTC and the community land trust which makes the purchase of land for the homes affordable.
- A \$3.8 million construction and permanent financing loan to a medical facility to expand its operations. The facility provides medical and dental care, health screening, mental health, and other services primarily to low-income persons.

Product Innovation and Flexibility – Product innovation and flexibility do not have an impact on this AA. Key originated two loans totaling \$16M for a local government home improvement program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the Olympia and Yakima AAs is not inconsistent with the overall Outstanding performance noted in the state of Washington. Performance in the Bellingham, Bremerton, Kennewick-Pasco-Richland, Tacoma, and non-MSA AAs is weaker due to lower geographic distribution. HMDA and small business loan volume in the Longview, Mount Vernon, and Wanatchee AAs were insufficient for a meaningful analysis and conclusion.

INVESTMENT TEST

Key’s overall Investment Test performance in Washington is High Satisfactory. Based on a full-scope review, performance in the Seattle AA is good. Performance in the limited-scope AAs and statewide/regional investments do not impact the overall Investment Test rating in Washington.

Refer to Table 14 in the state of Washington section and Additional Qualified Investments table of Appendix D for facts and data used to evaluate the bank’s level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made three investments totaling \$13.5 million, and 61 donations totaling \$462 thousand. Key has 46 prior period investments with an outstanding balance of \$24.3 million as of September 30, 2011. Investments from prior periods continue to impact the investment performance in the AA.

Key’s investments are responsive and flexible, and meet the Seattle AA’s need for affordable housing and low- and moderate- income neighborhood revitalization and stabilization. As an example, Key’s Tulalip Homes Project consists of 66 single family rental properties, and target low- and moderate-income families that live on Native American land. This project provides social services and financial literacy education. Key partnered with the Mescalero Apache Housing Authority to provide occupants a subsidized housing contract for 15 years.

The bank made investments in funds that target regions throughout the State of Washington and in the broader regional area. These investments, while not directly targeting the bank’s AAs; either have the potential to benefit the AAs or the broader statewide or regional area. Key has one statewide investment totaling \$2.9 million in the current evaluation period, and one statewide investment with a remaining balance of \$93 thousand from a prior period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Investment Test performance in the Bellingham AAs is not inconsistent with the overall High Satisfactory performance noted in the state of Washington. Performance in the Yakima and non-MSA AAs is stronger due to higher investments. Performance in Bremerton, Kennewick, Longview, Mt. Vernon, Olympia, Tacoma, and Wenatchee AAs is

considered poor due to significantly fewer investments, no current investments and little or no prior period investments.

SERVICE TEST

Key's overall Service Test performance in Washington is Outstanding. Performance in the Seattle AA is excellent. Performance in limited-scope AAs did not impact the Service Test rating in Washington.

Refer to Table 15 in the state of Washington section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services – Bank branches are readily accessible to all portions of the Seattle AA. There are five branches located in low-income geographies and 23 branches located in moderate-income geographies. The percentage of the bank's branches located in low- and moderate-income geographies exceeds the percentage of the population residing in those geographies. Branch openings and closings have not adversely impacted the accessibility of delivery systems. Key opened 14 offices in the AA including one in a moderate-income geography. Key closed two branches, including one branch located in a moderate-income geography. Services and products offered at branches are consistent throughout the branch network. Numerous branches employ staff members who are proficient in languages other than English. These bilingual staff members improve the convenience of accessing products by helping to overcome potential language and cultural barriers. Banking hours do not vary in a way that inconveniences people within the assessment area. Access to banking services is enhanced by an excellent distribution of ATMs throughout the AA.

Community Development Services (CD) - Key provided a good level of CD services to the AA. Numerous bank employees routinely serve in key financial positions within many AA community groups whose efforts target affordable housing, economic development, and social services for low- and moderate-income people. These areas were identified as community service needs within the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the Mount Vernon, Wenatchee, and non-MSA AAs is not inconsistent with the overall Outstanding performance noted in the state of Washington. Performance in the Bellingham, Bremerton, Kennewick, Longview, Olympia, Tacoma, and Yakima AAs is weaker due to lower branch distribution in low- and moderate-income geographies.

OTHER RATING AREAS

Cincinnati-Middletown, OH-KY-IN Multistate Metropolitan Statistical Area (MMSA) Rating

CRA Rating for the MMSA³: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Good Lending Test performance based on adequate lending activity, and good geographic and borrower distributions. In addition, CD loans have a positive impact on lending performance.
- Excellent Investment Test performance that is responsive to the identified needs in the AA. Positive consideration was given to the continuing impact of prior period investments in the assessment area.
- Adequate Service Test performance based on adequate branch distribution. Performance is supplemented by a good level of CD services.

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

Key has 31 branches and 39 full service ATMs in the Cincinnati-Middletown, OH-KY-IN MMSA (Cincinnati MMSA). The MMSA includes twelve counties in Ohio and Kentucky. Key's AAs includes seven of the twelve counties. The Cincinnati AA is the thirteenth largest rating area for the bank. In this AA, the bank has \$908 million in deposits. This represents 1.5% of the bank's total deposits. Key has 30 branches and 39 deposit-taking ATMs. We conducted a full-scope review of this AA.

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

LENDING TEST

Key's overall Lending Test performance in the Cincinnati MMSA is High Satisfactory. This is the result of good lending performance. Also, CD lending in the Cincinnati MMSA has a positive impact on lending performance.

Refer to Tables 1 through 12 in the Cincinnati Multistate section of Appendix D for facts and data used to evaluate the bank's lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity – Lending activity in the Cincinnati MMSA is adequate considering the bank's corporate banking focus and highly competitive market. Key's competitors include 423 home mortgage and 92 small business lenders. Of these numerous competitors, only 62 are depository institutions. Key ranks eighth among the depository institutions with a 1.5% deposit market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage rank is 37th with a .37% market share, and its small business rank is 22nd with a .48% market share. The top home mortgage lender in the AA is a local savings bank with 11% market share. A national credit card company dominates the small business market with 21% market share.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is good. HMDA loan distribution is good based on good home purchase, and adequate home refinance. Home improvement loan distribution is good. Distribution of small loans to businesses is good.

Distribution of Loans by Income Level of the Borrower – Overall borrower distribution of loans is good. HMDA loan distribution is good based on excellent home purchase and good home refinance loan distributions. Home improvement loan distribution is adequate. Distribution of small loans to businesses is adequate. The percentages of home refinance loans and home improvement loans made to low-income borrowers are significantly less than the percentage of low-income families. However, performance is deemed adequate after considering the high percentage of families living at or below poverty. Also, HMDA performance to moderate-income borrowers meets or exceeds the percentage of those families.

Community Development Lending (CD) – CD lending has a positive impact on lending test performance. Key made four CD loans totaling \$13 million. CD lending activity centers on affordable housing.

Product Innovation and Flexibility – Product innovation and flexibility do not have an impact on this MMSA. Key originated 70 loans totaling \$1 million through a city government home improvement program.

INVESTMENT TEST

Key's overall Investment Test performance in the Cincinnati MMSA is Outstanding. Regional investments do not impact the overall Investment Test rating in the Cincinnati multistate.

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

Conclusions for Areas Receiving Full Scope Reviews

During the evaluation period, Key made three investments in the MMSA totaling \$3 million and 15 donations totaling \$171 thousand. We considered the continuing impact from 42 prior period investments with outstanding balances of \$7.8 million as of September 30, 2011. These investments were responsive to affordable housing and revitalization and stabilization needs in the AA.

Consideration is given to investments the bank made in funds in the broader regional area, but not located within any of the bank's assessment areas. While these investments are not located directly within the bank's assessment area; they either have the potential to benefit the assessment area or the broader regional area.

SERVICE TEST

Refer to Table 15 in the Multistate section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's overall Service Test performance in the Cincinnati MMSA is Low Satisfactory. Bank branches are reasonably accessible to essentially all portions of the AA. Services and products offered by bank branches are consistent across the bank network. During the evaluation period the bank did not open or close any branches. Banking hours are good and consistent regardless of the location. The overall distribution of the bank's deposit-taking ATMs is adequate. Key provides a good level of CD services.

Portland-Vancouver-Beaverton, OR-WA Multistate Metropolitan Statistical (MMSA) Rating

CRA Rating for the MMSA⁴: Outstanding

The lending test is rated: High Satisfactory
The investment test is rated: Outstanding
The service test is rated: Outstanding

The major factors that support this rating include:

- Good Lending Test performance based on adequate lending activity, adequate geographic distribution, and good borrower distribution. In addition, CD lending has a positive impact on Key's overall lending performance.
- Excellent Investment Test performance considering current period investments and the continuing impact of prior period investments in the assessment area.
- Excellent Service Test performance based on excellent branch distribution. In addition, Key's record of opening branches has improved the accessibility of delivery systems in moderate-income geographies. ATM distribution is adequate. The bank also provides an excellent level of CD services.

Description of Institution's Operations in Portland-Vancouver, OR-WA MMSA

Key has 53 branches and 67 full service ATMs in the Portland-Vancouver, OR-WA MMSA (Portland MMSA). The MMSA includes seven counties. Key's AAs includes five of the seven counties. This AA is the fifth largest rating area for the bank. In this AA, the bank has \$2.5 billion in deposits. This represents 4.2% of the bank's total deposits. We conducted a full-scope review of this AA.

Key originated a small number of small farm loans. However, the volume is sufficient to justify an analysis of this product. As discussed in the Description of Evaluation Process section of this Evaluation, this category has a limited impact on our conclusions regarding lending performance.

LENDING TEST

Key's overall lending performance in the Portland MMSA is Outstanding. This is the result of good lending performance. In addition, CD lending in the Portland MMSA has a positive impact on lending performance.

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

Refer to Tables 1 through 12 in the Portland Multistate section of Appendix D for facts and data used to evaluate the bank's lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in the Portland MMSA is adequate considering the bank's corporate banking focus and highly competitive market. Key's competitors include 453 home mortgage and 94 small business lenders. Of these numerous competitors, only 40 are depository institutions. Key ranks sixth among the depository institutions with a 6.2% deposit market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage rank is 26th with a .99% market share, and its small business rank is 12th with a .85% market share. The home mortgage and small business markets are dominated by a large banking company with at least 22% market share.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is adequate. HMDA loan distribution is adequate based on excellent home purchase and poor home refinance loan distributions. Home improvement loan distribution is good. Distribution is excellent for small loans to businesses, and poor for small farm loans.

Distribution of Loans by Income Level of the Borrower – The overall borrower distribution of loans is good. HMDA loan distribution is good based on good home purchase and home refinance loan distributions. Home improvement loan distribution is excellent. Distributions of small loans to businesses and small loans to farms are adequate. The percentages of home purchase and refinance loans made to low-income borrowers are significantly less than the percentage of low-income families. However, performance is deemed adequate after considering the high percentage of families living at or below poverty. Also, HMDA performance to moderate-income borrowers exceeds the percentage of those families.

Community Development Lending (CD) – CD lending has a positive impact on the lending test performance. Key made 13 CD loans totaling \$48 million. CD lending activity primarily targets affordable housing needs (99% of loans), and community services (1% of loans).

Product Innovation and Flexibility – No specific product is identified in this MMSA that is innovative or flexible.

INVESTMENT TEST

Based on a full-scope review, Key's overall Investment Test performance in the Portland MMSA is Outstanding. Regional investments do not impact the overall Investment Test rating in the Portland multistate.

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

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made one investment in the MMSA totaling \$7.3 million and 26 donations totaling \$404 thousand. We considered the continuing impact from 46 prior period investments with outstanding balances totaling \$38.6 million as of September 30, 2011. These investments were responsive to affordable housing and revitalization and stabilization needs in the AA.

Consideration is given for investments the bank made in funds in the broader regional area, but not located within any of the bank's assessment areas. While these investments are not located directly within the bank's assessment area; they either have the potential to benefit the assessment areas or the broader regional area.

SERVICE TEST

Refer to Table 15 in the Multistate section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's overall Service Test performance in the Portland MMSA is Outstanding. Bank branches are readily accessible to all portions of the AA. The percentage of branches in low-and moderate-income geographies exceeds the population percentages in those geographies. Services and products offered by bank branches are consistent across the bank network. Branch openings and closings have improved access to banking services within moderate-income areas. During the evaluation period, the bank opened 13 offices, including three in moderate-income geographies. No branches were closed during the review period. Banking hours are generally consistent regardless of location. The overall distribution of the bank's deposit-taking ATMs is adequate. Key employees provide an excellent level of CD services through its network of bank employees.

State of Alaska

CRA Rating for Alaska: Satisfactory

The lending test is rated: High Satisfactory
The investment test is rated: Low Satisfactory
The service test is rated: High Satisfactory

Major factors that support this rating are primarily based on performance in the full scope Anchorage AA, and include:

- Good Lending Test performance based on adequate lending activity, good geographic distribution, and adequate borrower distribution. In addition, CD lending has a positive impact on overall lending performance.
- Adequate Investment performance considering limited opportunities for qualified investments in the assessment area. Positive consideration was given to the continuing impact that prior period investments have in the assessment area.
- Good Service Test performance based on good branch distribution. The bank also provides an adequate level of CD services.

Description of Institution’s Operations in Alaska

Key has 17 branches and 19 full service ATMs in the state of Alaska. Key has delineated seven AAs within the state. The AAs include two MSAs and five non-metropolitan areas. Statewide, the bank has \$913 million in deposits. This represents 1.5% of the bank’s total deposits. Alaska is the twelfth largest rating area for the bank. Within Alaska, 68.2% of the bank’s deposits in the state are concentrated in the Anchorage MSA (Anchorage AA) where Key has six branches and seven deposit-taking ATMs. As a result of the significant loan volume, the Anchorage AA was selected to receive a full-scope review; it also carried the greatest weight in Alaska’s state performance ratings. The remaining MSAs and the combined non-MSAs are analyzed using limited-scope procedures.

LENDING TEST

Key’s overall Lending Test performance in Alaska is High Satisfactory. Based on a full scope review, performance in the Anchorage AA is good. CD lending in the Anchorage AA has a positive impact on lending performance. Performance in the limited-scope AAs do not impact the Lending Test rating in Alaska.

Refer to Tables 1 through 12 in the state of Alaska section of Appendix D for the facts and data used to evaluate the bank’s lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity – Lending activity in the Anchorage AA is adequate considering the bank’s corporate banking focus and highly competitive market. Key’s competitors include 112 home mortgage and 39 small business lenders. Of these numerous competitors, only four are depository institutions. Key ranks fourth among the depository institutions with a 12.42% deposit market share. We noted lower volumes in lending market rankings and market shares. Key is ranked 12th in both home mortgage and small loans to businesses, with market shares of .65% and .90%, respectively. For both lending products, there are at least three dominant financial institutions (a mortgage company, large financial institution, and a credit card company) that hold more than 65% of the market share. An analysis of home improvement lending was not considered meaningful due to an insufficient number of loans originated during the review period.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is good. HMDA loan distribution is adequate based on good home purchase and adequate home refinance loan distributions. Distribution of small loans to businesses is excellent. The bank did not make any home purchase loans in low-income geographies. However, performance in low-income geographies was given minimal consideration given the very small percentage of owner-occupied housing units in the geographies.

Distribution of Loans by Income Level of the Borrower – The overall borrower distribution of loans is adequate. HMDA loan distribution is adequate based on good home purchase and adequate home refinance loan distributions. Distribution of small loans to businesses is poor. Percentage of home purchase loans made to low-income borrowers is significantly less than the percentage of those families living in the AA; however, performance is considered adequate when considering the high housing costs in the AA. The percentage of home refinance loans made to low-income borrowers is considerably less than the percentage of those families living in the AA. In this case, performance is considered poor. Also, HMDA performance to moderate-income borrowers exceeds the percentage of those families.

Community Development Lending (CD) – CD lending has a positive impact on lending performance in the AA. Key made 13 CD loans totaling \$331 million. CD lending activity targets revitalization and stabilization (86% of loans) and community services (14% of loans) needs of the AA.

Product Innovation and Flexibility – No specific product is identified in this AA that is viewed as innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the Fairbanks and non-MSA are weaker than the overall High Satisfactory performance noted in the state of Alaska. The weaker performance is due to lower geographic distribution. HMDA loan volume in the Fairbanks AA was insufficient for a meaningful analysis and conclusion.

INVESTMENT TEST

Key's overall Investment Test performance in Alaska is Low Satisfactory. Based on a full-scope review, performance in the Anchorage AA is adequate. Performance in the limited-scope and statewide or regional investments does not impact the Investment Test rating in Alaska.

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

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made no investments in the AA. We considered the continuing impact from one prior period investment with an outstanding balance of \$2.6 million as of September 30, 2011. Opportunities to invest in qualified investments were limited.

The bank also made investments in funds throughout the state of Alaska and in the broader regional area, but not located within any of the bank's AAs. These investments, while not located directly within the bank's AAs; either have the potential to benefit the AAs or the broader statewide or regional area. Key has two statewide investments with a remaining balance of \$1.6 million from a prior period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited scope reviews, the Investment Test performance in the Fairbanks AA is stronger than the overall Low Satisfactory performance noted in the state of Alaska due to more investments. Performance in the non-MSA AA is weaker due to fewer investments.

SERVICE TEST

Key's overall Service Test performance in Alaska is High Satisfactory. Performance in the Anchorage AA is good. Performance in limited-scope AAs does not impact the Service Test rating in Alaska.

Refer to Table 15 in the state of Alaska section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

Bank branches are accessible to essentially all portions of the Anchorage AA. The bank has no branches in low-income geographies where the population percentage is very low. As a result, greater consideration was given to performance in moderate-income geographies where the population percentage is significant, and the percentage of bank branches exceeds the percentage of people living there. Services and products offered by bank branches are consistent across the bank network. During the evaluation period the bank did not open or close any branches. Banking hours are good and consistent regardless of the location. The overall distribution of the bank's deposit-taking ATMs is adequate. Key provides an adequate level of CD services.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, Service Test performance in the Fairbanks and non-MSA AAs is weaker than the overall High Satisfactory performance noted in the state of Alaska. The weaker performance is due to lower branch distribution in moderate-income geographies. These AAs do not contain low-income geographies.

State of Colorado

CRA Rating for Colorado: Outstanding

The lending test is rated: Outstanding
The investment test is rated: High Satisfactory
The service test is rated: High Satisfactory

Major factors that support this rating are primarily based on performance in the full scope Denver AA, and include:

- Excellent Lending Test performance based on adequate lending activity, and good geographic and borrower distributions. In addition, CD lending has a significantly positive impact that elevates Key’s overall lending performance rating to Outstanding.
- Good Investment Test performance that is responsive to the needs in the AA. We also gave consideration to the significant continuing impact of prior period investments in the assessment area.
- Good Service Test performance based on good branch distribution. In addition, Key’s record of opening branches has improved the accessibility of delivery systems in .moderate-income geographies. The bank also provides a good level of CD services.

Description of Institution’s Operations in Colorado

Key has 72 branches and 96 full service ATMs in the state of Colorado. Key has delineated seven AAs within the state. The AAs include five MSAs and two non-metropolitan areas. Statewide, the bank has \$2.1 billion in deposits. This represents 3.5% of the bank’s total deposits. Colorado is the seventh largest rating area for the bank. Within Colorado, 85.4% of the bank’s deposits are concentrated in the Denver-Aurora MSA (Denver AA) where Key has 56 branches and 67 deposit-taking ATMs. As a result, this AA received a full-scope review; it also carried the greatest weight in Colorado’s state performance ratings. The remaining MSAs and the combined non-metropolitan AAs were analyzed using limited-scope procedures.

LENDING TEST

Key’s overall Lending Test performance in Colorado is Outstanding. Based on a full scope review, performance in the Denver AA is good. CD lending in the Denver AA is excellent and elevates overall lending performance. Performance in the limited-scope AAs does not impact the Lending Test rating in Colorado.

Refer to Tables 1 through 12 in the state of Colorado section of Appendix D for the facts and data used to evaluate the bank’s lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in the Denver AA is adequate considering the bank's corporate banking focus and highly competitive market. Key's competitors include 620 home mortgage and 135 small business lenders. Of these numerous competitors, only 71 are depository institutions. Key ranks sixth among the depository institutions with a 3.05% deposit market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage rank is 38th with a .51% market share, and its small business rank is 18th with a .56% market share. There is one dominant lender for home mortgages, and a large national financial institution and a credit card company that combined, account for 49% of the small business market share.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is good. HMDA loan distribution is good based on excellent home purchase and good home refinance loan distributions. Home improvement loan distribution is excellent. Distribution of small loans to businesses is excellent.

Distribution of Loans by Income Level of the Borrower – Overall borrower distribution of loans is good. HMDA loan distribution is good based on excellent home purchase and adequate home refinance loan distributions. Home improvement loan distribution is good. The percentages of home refinance and home improvement loans made to low-income borrowers is significantly less than the percentage of those families. However, performance is deemed adequate considering high housing costs. Distribution of small loans to businesses is adequate. Also, HMDA performance to moderate-income borrowers is less than or exceeds the percentage of those families.

Community Development Lending (CD) – CD lending has a significantly positive impact on the lending test rating in the AA. Key made 16 CD loans totaling \$90 million. CD lending activity targets affordable housing (96% of loans) and revitalization and stabilization (4% of loans) needs of the AA.

Product Innovation and Flexibility – No specific product was identified in this AA that is viewed as innovate or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the Boulder AA is not inconsistent with the overall Outstanding performance noted in the state of Colorado. Performance in the Colorado Springs and Fort Collins AAs is weaker due to lower geographic or borrower distribution. HMDA and small business loan volume in the Greeley and non-MSA AAs was insufficient for a meaningful analysis or conclusion.

INVESTMENT TEST

Key's overall Investment Test performance in Colorado is High Satisfactory. Based on a full-scope review, performance in the Denver AA is good. Performance in the limited-scope AAs and statewide/regional investments did not impact the overall Investment Test rating in Colorado.

Refer to Table 14 in the state of Colorado section and Additional Qualified Investments table of Appendix D for facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made one investment in the AA totaling \$4.6 million and 33 donations totaling \$258 thousand. In addition, we considered the continuing impact of 27 prior period investments with outstanding balances of \$11.3 million as of September 30, 2011. These investments are responsive to affordable housing needs in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, Investment Test performance in the Colorado Springs AA is not inconsistent with the overall High Satisfactory performance in the state of Colorado. Performance in the Boulder AA is stronger due to higher investments. Performance in the Ft. Collins AA is weaker due to fewer investments. Performance in the Greeley and non-MSA AAs is considered poor due to significantly fewer investments, and no current or prior period investments.

Consideration is given to investments the bank made in funds in the broader regional area, but not located within any of the bank's assessment areas. These investments, while not located directly within the bank's assessment areas; either have the potential to benefit the assessment areas or broader regional area.

SERVICE TEST

Key's overall Service Test performance in Colorado is High Satisfactory. Based on a full-scope review, performance in the Denver AA is good. Performance in limited-scope AAs does not impact the Service Test rating in Colorado.

Refer to Table 15 in the state of Colorado section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

Bank branches are accessible to essentially all portions of the Denver AA. More weight was given to branches located in moderate-income geographies because the population in those geographies is greater than the population in low-income geographies. The bank has no branches in low-income geographies. In moderate-income geographies the percentage of branches exceeds the percentage of people living there. Services and products offered by branches are consistent across the bank network. Branch openings and closings have improved access to banking services within moderate-income areas. During the evaluation period, Key opened 21 offices in the AA including eight in moderate-income geographies. In addition, one branch was closed in upper-income geography. Banking hours are good and consistent regardless of the location. The overall distribution of deposit-taking ATMs is adequate. Key provided a good level of CD services.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited scope reviews, Service Test performance in the Colorado Springs and Fort Collins AAs is not inconsistent with the overall High Satisfactory performance noted in the state of Colorado. Performance in the Boulder and Greeley AAs is weaker due to lower branch distribution in low-and moderate- income geographies. Performance in the non-MSA AA is also weaker. The AA does not contain either low-or moderate-income census tracts.

State of Connecticut

CRA Rating for Connecticut: Need to Improve

The lending test is rated: Needs to Improve

The investment test is rated: Low Satisfactory

The service test is rated: Low Satisfactory

Major factors that support this rating are primarily based on performance in the full scope Bridgeport AA, and include:

- Poor Lending Test performance based on poor lending activity. An analysis of geographic and borrower distributions was not performed due to insufficient lending volume during the review period.
- Adequate Investment Test performance based on lack of qualified investment opportunities. We gave positive consideration to a significant prior period statewide investment.
- Adequate Service Test performance based on adequate branch distribution.

Description of Institution’s Operations in Connecticut

Key has one branch and one full service ATM in the state of Connecticut. Key delineated one AA within the state, the Bridgeport-Stamford-Norwalk MSA (Bridgeport AA). In the state and AA, the bank has \$63 million in deposits. This represents 0.1% of the bank’s total deposits. Connecticut is the sixteenth largest rating area for the bank. The Bridgeport AA received a full-scope review.

LENDING TEST

Key’s overall Lending Test performance in Connecticut is Needs to Improve. Based on a full scope review, performance in the Bridgeport AA is poor. No CD loans were made in the AA during the review period.

Refer to Tables 1 through 12 in the state of Connecticut of Appendix D for the facts and data used to evaluate the bank’s lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in Bridgeport AA is poor considering the low volume of loans originated during the review period. Key originated less than ten loans for either HMDA or small business loans. Key’s competitors include 216 home mortgage and 85 small business lenders. Of these numerous competitors, only 32 are depository institutions. Key ranks 26th among the depository institutions with a .20% deposit market share. We noted lower volumes in lending market rankings and market shares. Key’s home mortgage rank is 136th with a .04% market share, and small business rank is 39th with a .03% market share. The top home mortgage lender

in the market made less than 1,000 loans. There are three large banks and a national credit company with 77% of market share that dominate the small business loan market. Key's originations in this AA were minute.

Distribution of Loans by Income Level of the Geography – The volume of HMDA and small loans to businesses was insufficient to result in a meaningful analysis or conclusion.

Distribution of Loans by Income Level of the Borrower – The volume of HMDA and small loans to businesses was insufficient to result in a meaningful analysis or conclusion.

Product Innovation and Flexibility – No specific product is identified in this AA that is viewed as innovative or flexible.

INVESTMENT TEST

Key's overall Investment Test performance in Connecticut is Low Satisfactory. Based on a full-scope review, performance in the Bridgeport AA is adequate. Statewide investments positively impact the Investment Test rating in Connecticut.

Refer to Table 14 in the state of Connecticut section and Additional Qualified Investments table of Appendix D for facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, limited opportunities existed for qualified investments. Key had no current period investments, and there were no prior period investments in the AA outstanding as of September 30, 2011. The bank made investments in funds throughout the state of Connecticut and in the broader regional area. These investments, while not located directly within the bank's AAs; either have the potential to benefit the AAs or the broader statewide or regional area. Key had one statewide investment with a remaining balance of \$999 thousand from a prior period.

SERVICE TEST

Key's overall Service Test performance in Connecticut is Low Satisfactory. Based on a full-scope review, performance in the Bridgeport AA is adequate.

Refer to Table 15 in the state of Connecticut section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

The bank branch is reasonably accessible to essentially all portions of the Bridgeport AA. Key has limited presence in the AA. There is only one branch that is located in a middle-income geography, and as noted in the Description of Institution Operations in the Connecticut section of this document, it was obtained through an acquisition. There are no branches in low- or

moderate-income geographies. The bank did not open or close any branches during the review period. The overall distribution of the bank's deposit-taking ATMs is adequate. The bank's only ATM is located at the branch.

State of Florida

CRA Rating for Florida: Needs to Improve

The lending test is rated: Needs to Improve
The investment test is rated: Needs to Improve
The service test is rated: Low Satisfactory

Major factors that support this rating are primarily based on performance in the full scope Naples AA, and include:

- Poor Lending Test performance based on poor lending activity. An analysis of geographic and borrower distributions was not performed due to insufficient lending volume during the review period.
- Poor Investment Test performance based on poor current and no prior period investments volumes.
- Adequate Service Test performance based on adequate branch distribution.

Description of Institution’s Operations in Florida

Key has three branches and no ATMs in the state of Florida. Key delineated three AAs within the state. The AAs include three MSAs. Statewide, the bank has \$773 million in deposits. This represents 1.3% of the bank’s total deposits. Florida is the fourteenth largest rating area for the bank. Within Florida, 76.7% of deposits are concentrated in the Naples-Marco island MSA (Naples AA) where Key has one branch and no ATMs. As a result of these factors, this AA received a full-scope review. It also carries the greatest weight in Florida’s state performance ratings. The remaining MSAs are analyzed using limited-scope procedures.

Florida branches do not provide traditional retail banking services. The branches are chartered as full-service facilities; but are utilized to provide private banking services.

LENDING TEST

Key’s overall Lending Test performance in Florida is Needs to Improve. Based on a full scope review, performance in the Naples AA is poor. No CD loans were made in the Naples AA during the review period. Performance in the limited-scope AAs does not impact the Lending Test rating.

Refer to Tables 1 through 12 in the state of Florida section of Appendix D for facts and data used to evaluate the bank’s lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in the Naples AA is poor considering the low volume of loans originated during the review period. HMDA products and small loans to businesses each had less than 50 loans to analyze.

Key's competitors include 423 home mortgage and 84 small business lenders. Of these numerous competitors, only 41 are depository institutions. Key ranks sixth among the depository institutions with a 5.94% market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage rank is 55th with a .22% market share, and small business rank is 33rd with a .23% market share.

Distribution of Loans by Income Level of the Geography – The volume of HMDA and small loans to businesses was insufficient to result in a meaningful analysis or conclusion.

Distribution of Loans by Income Level of the Borrower – The volume of HMDA and small loans to businesses was insufficient to result in a meaningful analysis or conclusion.

Product Innovation and Flexibility – No specific product is identified in the AA that is viewed as innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, performance in the Cape Coral AA was stronger than the overall Needs to Improve performance noted for the state of Florida. The stronger performance was due to small business performance. HMDA loan volume in the Cape Coral AA, and HMDA and small business loan volume in the West Palm AA were insufficient for a meaningful analysis and conclusion.

INVESTMENT TEST

Key's overall Investment Test performance in Florida is Needs to Improve. Based on a full-scope review, performance in the Naples AA is poor. Performance in the limited-scope AAs and statewide/regional investments does not impact the Investment Test rating in Florida

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

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, limited opportunities existed for qualified investments in the AA. Key made two donations totaling \$10 thousand in the AA. There were no prior period investments outstanding as of September 30, 2011.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the Investment Test performance in the West Palm AA is not inconsistent with the overall Needs to Improve performance noted for the state of Florida. Performance in the Cape Coral AA is stronger due to more investments.

SERVICE TEST

Key's overall Service Test performance in Florida is Low Satisfactory. Based on a full-scope review, performance in the Naples AA is adequate. Performance in the limited-scope AAs does not impact the Service Test rating in Florida.

Refer to Table 15 in the state of Florida section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

The bank branch is reasonably accessible to essentially all portions of the Naples AA. As noted in the Description of Institution Operations in Florida section of this document, the single branch in this AA is established to primarily service private banking customers. The branch is located in upper-income geography. No branches are located in low- or moderate-income geographies. The bank did not open or close any branches during the review period. No CD services were noted for this AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the Cape Coral and West Palm Beach AAs is not inconsistent with the overall Low Satisfactory performance in the state of Florida.

State of Idaho

CRA Rating for Idaho: Satisfactory

The lending test is rated: High Satisfactory
The investment test is rated: High Satisfactory
The service test is rated: Outstanding

Major factors that support this rating are primarily based on performance in the full scope Boise AA, and include:

- Good Lending Test performance based on adequate lending activity, and good geographic and borrower distributions.
- Good Investment Test performance based on adequate current and prior period investments volumes. Performance in the limited-scope AAs received positive consideration and elevated overall performance in the state.
- Excellent Service Test performance based on good branch distribution. Performance is enhanced to excellent because of excellent performance in limited scope AAs that represent nearly 40% of the state’s deposits.

Description of Institution’s Operations in Idaho

Key has 33 branches and 38 full service ATMs in the state of Idaho. Key delineated eleven AAs within the state. The AAs include three MSAs and eight non-metropolitan areas. Statewide, the bank has \$1 billion in deposits. This represents 1.7% of the bank’s total deposits. Idaho is the tenth largest rating area for the bank. Within Idaho, 61.6% of the bank’s deposits in the state are concentrated in the Boise City-Nampa MSA (Boise AA) where Key has 16 branches and 20 deposit-taking ATMs. As a result, this AA received a full-scope review and it carries the greatest weight in arriving at Idaho’s state performance ratings. The remaining MSAs and combined non-MSA are analyzed using limited-scope procedures.

Key originated a small number of small farm loans. However, the volume is sufficient to justify an analysis of this product. As discussed in the Description of Evaluation Process section of this Evaluation, this category has limited impact on our conclusions regarding lending performance.

LENDING TEST

Key’s overall Lending Test performance in Idaho is High Satisfactory. Based on a full scope review, performance in the Boise AA is good. CD lending in the Boise AA has a neutral impact on lending performance. Performance in the limited-scope AAs did not impact the Lending Test rating in Idaho.

Refer to Tables 1 through 12 in the state of Idaho section of Appendix D for facts and data used to evaluate the bank’s lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in Boise AA is adequate considering the bank's corporate banking focus and highly competitive market. Key's competitors include 231 home mortgage and 55 small business lenders. Of these competitors, only 22 are depository institutions. Key ranks fourth among the depository institutions with a 7.94% deposit market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage rank is 19th with a 1.49% market share, and small business rank is 15th with a .97% market share. For both lending products, there are at least three dominant financial institutions (a mortgage company, a large financial institution, and a credit card company) that dominate the market with 57% of the home mortgage market share and 31% of the small business market share. An analysis of home improvement lending was not considered meaningful due to an insufficient number of loans originated during the review period

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is good. HMDA loan distribution is adequate for all loan products. The bank did not make any HMDA loans in low-income geographies. However, performance in low-income geographies was given minimal consideration as they comprise a very small percentage of owner-occupied housing units. Distribution of small loans to businesses is excellent. Distribution of small loans to farms is adequate.

Distribution of Loans by Income Level of the Borrower – The overall borrower distribution of loans is good. HMDA loan distribution is good based on adequate home purchase and good home refinance loan distributions. The percentage of home purchase loans made to low-income borrowers is considerably less than the percentage of those families; therefore, performance is considered poor. The percentage of home refinance loans made to low-income borrowers is significantly less than the percentage of those families and performance is considered adequate. Performance for both loan products is elevated after considering the high percentage of families living at or below poverty. Also, HMDA performance to moderate-income borrowers exceeds the percentage of those families. Distribution of small loans to businesses is adequate and for small loans to farms is excellent.

Community Development Lending (CD) – CD lending has a neutral impact on lending performance in the AA. Key made one CD loan totaling \$3 million. CD lending activity is affordable housing.

Product Innovation and Flexibility - Product innovation and flexibility did not have an impact in this AA. Key originated 59 loans totaling \$234M to a state loan program to finance medical equipment for low- and moderate-income persons.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in all limited-scope AAs is not inconsistent with the overall High Satisfactory performance noted for the state of Idaho.

INVESTMENT TEST

Key's overall Investment Test performance in Idaho is High Satisfactory. Based on a full-scope review, performance in the Boise AA is adequate. Performance in the limited-scope AAs that account for 38% of deposits positively impacted the overall state rating. The statewide/or regional areas did not impact the overall Investment Test rating for Idaho.

Refer to Table 14 in the state of Idaho section and the Additional Qualified Investments table of Appendix D for facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made one investment for \$2.6 million and 14 donations totaling \$70 thousand in the AA. We considered the continuing impact from one prior period investment with an outstanding balance of \$175 thousand as of September 30, 2011. These investments were responsive to affordable housing needs in the AA.

The bank made investments in funds throughout the state of Idaho and in the broader regional area, but not located within any of the bank's AAs. These investments, while not located directly within the bank's AAs; either have the potential to benefit the AAs or broader statewide or regional area. Key made one statewide investment totaling \$1.0 million in the current evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, Investment Test performance in Pocatello is not inconsistent with the overall High Satisfactory performance noted for the state of Idaho. Performance in the Idaho Falls and non-MSA AAs is stronger due to more investments.

SERVICE TEST

Key's overall Service Test performance in Idaho is Outstanding. Based on a full-scope review, performance in the Boise AA is good. Performance in limited-scope AAs further enhances the good Service Test rating in Idaho to excellent. We noted excellent performance in all limited-scope AAs.

Refer to Table 15 in the state of Idaho section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

Bank branches are accessible to essentially all portions of the Boise AA. The bank has no branches in low-income geographies where the population percentage is very small. As a result, greater consideration is given to performance in moderate-income geographies where the population percentage is significant. The percentage of bank branches exceeds the percentage of people living there. Services and products offered by branches are consistent across the bank network.

During the evaluation period, two branches were opened in upper-income geographies; and no branches were closed. Banking hours are generally consistent regardless of location. The overall distribution of the bank's deposit-taking ATMs is adequate. Key provides an adequate level of CD Services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the Idaho Falls, Pocatello, and non-MSA AAs is not inconsistent with the overall Outstanding performance noted for the state of Idaho. The performance is due to substantially higher branch distribution in moderate-income geographies. These AAs do not contain low-income geographies.

State of Indiana

CRA Rating for Indiana: Satisfactory

The lending test is rated: Low Satisfactory
The investment test is rated: High Satisfactory
The service test is rated: High Satisfactory

Major factors that support this rating are primarily based on performance in the full scope Indianapolis AA, and include:

- Adequate Lending Test performance based adequate lending activity, adequate geographic distribution and good borrower distribution. In addition, CD lending has a positive impact on overall lending performance.
- Good Investment Test performance based on excellent current and prior period investments volumes in the full-scope AA. Consideration is given to weaker performance in limited-scope AAs which accounted for 54% of deposits and diminished overall performance.
- Good Service Test performance based on adequate branch distribution in the Indianapolis AA. Stronger performance in the limited scope AAs enhances performance to High Satisfactory. In addition, Key’s record of opening branches has improved the accessibility of delivery systems in moderate-income geographies. The bank also provides a good level of CD services.⁵

Description of Institution’s Operations in Indiana

Key has 76 branches and 98 full service ATMs in the state of Indiana. Key has delineated eleven AAs within the state. They include six MSAs and five non-metropolitan areas. Statewide, Key has \$2.6 billion in deposits. This represents 4.4% of the bank’s total deposits. Indiana is the fourth largest rating area for the bank. Within Indiana, 46.5% of the bank’s deposits in the state are concentrated in the Indianapolis MSA (Indianapolis AA) where Key also has 36 branches and 40 deposit-taking ATMs. As a result, this AA received a full-scope review. It also carried the greatest weight in Indiana state performance ratings. The remaining MSAs and combined non-metropolitan AAs are analyzed using limited-scope procedures.

LENDING TEST

Key’s overall Lending Test performance in Indiana is High Satisfactory. Based on a full-scope review, performance in the Indianapolis AA is good. CD lending in the Indianapolis AA has a

⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

positive impact on lending performance. Performance in the limited-scope AAs and statewide or regional CD loans does not impact the Lending Test rating in Indiana.

Refer to Tables 1 through 12 in the state of Indiana section and the CD Additional Activity Table in appendix D for facts and data used to evaluate the bank's lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in the Indianapolis AA is adequate considering the bank's corporate banking focus and highly competitive market. Key's competitors include 468 home mortgage and 95 small business lenders. Of these numerous competitors, only 45 are depository institutions. Key ranks eighth among the depository institutions with a 3.99% deposit market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage rank is 33rd with a .58% market share, and small business rank is 21st with a .80% market share. A large bank and a national credit card company with 39% market share dominate the small business market. The volume of small loans to farms is insufficient to result in a meaningful analysis or conclusion.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is adequate. HMDA loan distribution is adequate based on adequate home purchase and very poor home refinance loan distributions. Home improvement loan distribution is poor. In addition, market share strengthened overall lending performance. Overall market share in the AA shows that the bank is not a major lender. However, the bank's market share performance in low-income and moderate-income geographies outperforms the overall market performance at levels that exceed or substantially meet the bank's overall market share.

Distribution of Loans by Income Level of the Borrower – The overall borrower distribution of loans is good. HMDA loan distribution is excellent based on excellent home purchase and good home refinance loan distributions. Home improvement loan distribution is excellent. The percentage of home refinance loans made to low-income borrowers is significantly less than the percentage of those families; however, performance is adequate considering the high percentage of families living at or below poverty. Also, HMDA performance to moderate-income borrowers exceeds the percentage of those families. Distribution of small loans to businesses is adequate.

Community Development Lending (CD) – CD lending has a positive impact on lending performance in the AA. Key made 19 CD loans totaling \$78 million. CD lending activity targets the needs of the community for affordable housing (77% of loans) and revitalization and stabilization (23%).

Product Innovation and Flexibility – No specific product is identified in this AA that is viewed innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the Elkhart and South-Bend AAs is not inconsistent with the overall High Satisfactory performance noted in the state of Indiana. Performance in the Kokomo and non-MSA AAs is stronger because of better geographic and borrower distribution. Performance in the Anderson AA is weaker due to geographic distribution.

HMDA and small business loan volume in the Bloomington AA, and small business loan volume in the Anderson and Kokomo AAs were insufficient for a meaningful analysis and conclusion.

INVESTMENT TEST

Key's overall Investment Test performance in Indiana is High Satisfactory. Based on a full-scope review, performance in the Indianapolis AA which accounts for 46% of deposits is excellent. Performance in the limited-scope AAs diminished the overall Investment Test rating in Indiana. Statewide/regional investments did not impact the overall rating.

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

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made nine investments in the AA totaling \$45.2 million and 17 donations totaling \$170 thousand. We considered the continuing impact from 25 prior period investments with an outstanding balance of \$2.6 million as of September 30, 2011. These investments are responsive to affordable housing and revitalization and stabilization needs in the AA.

Consideration is given to investments the bank made in funds in the broader regional area; but the funds are not located within any of the bank's assessment areas. These investments, while not located directly within the bank's assessment areas; either have the potential to benefit the assessment areas or the broader regional area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the Investment Test performance in the South Bend AA is not inconsistent with the overall High Satisfactory performance noted in the state of Indiana. Performance in the Anderson, Bloomington, Elkhart, Kokomo, and non-MSA AAs is weaker due to fewer investments.

SERVICE TEST

Key's overall Service Test performance in Indiana is High Satisfactory. Based on a full-scope review, performance in the Indianapolis AA is adequate performance was enhanced to good based on stronger performance in limited-scope AAs which account for 53% of state deposits.

Refer to Table 15 in the state of Indiana section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full Scope Reviews

Bank branches are reasonably accessible to essentially all portions of the Indianapolis AA. Services and products offered by bank branches are consistent across the bank network. Branch opening have improved access to banking services within moderate-income areas. Key opened 13 offices, including five in moderate-income geographies. Banking hours are generally consistent regardless of location. The overall distribution of the bank's deposit taking ATMs is adequate. Key provides a good level of CD services.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, Service Test performance in the Anderson and South Bend AAs is not inconsistent with the overall High Satisfactory performance noted in the state of Idaho. Performance in the Elkhart AA is stronger due to higher branch distribution in low- and moderate-income geographies. Performance in the Kokomo and non-MSA AAs is stronger due to higher distribution in moderate-income geographies. These AAs do not have low-income geographies. Performance in the Bloomington AA is weaker due to limited branch presence in the AA. The bank has only one branch located in an upper-income geography.

State of Maine

CRA Rating for Maine: Satisfactory

The lending test is rated: High Satisfactory
The investment test is rated: High Satisfactory
The service test is rated: High Satisfactory

Major factors that support this rating are primarily based on performance in the full scope Portland AA, and include:

- Good Lending Test performance based on adequate lending activity, and good geographic distribution and adequate borrower distribution. In addition, CD loans had a positive impact on overall lending performance.
- Good Investment Test performance based on excellent current and prior period investments volumes in the full-scope AA. Consideration is given to weaker performance in limited-scope AAs which accounted for 39% of deposits and diminished overall performance.
- Good Service Test performance based on good branch distribution. The bank also provided a good level of CD services.

Description of Institution's Operations in Maine

Key has 62 branches and 86 full service ATMs in the state of Maine. Key delineated 13 AAs within the state. The AAs include three MSAs and ten non-metropolitan areas. Statewide, the bank has \$2.5 billion in deposits. This represents 4.1% of the bank's total deposits. Maine is the sixth largest rating area for the bank. Within Maine, 60.5% of the bank's deposits in the state are concentrated in the Portland-South Portland MSA (Portland AA) where Key has 26 branches and 36 deposit-taking ATMs. As a result, this AA received a full-scope review and it carried the greatest weight in Maine's state performance ratings. The remaining MSAs and the combined non-MSA are analyzed using limited-scope procedures.

LENDING TEST

Key's overall Lending Test performance in Maine is High Satisfactory. Based on a full-scope review, performance in the Portland AA is good. CD lending in the Portland AA has a positive impact on lending performance. Performance in the limited-scope AAs does not impact the Lending Test rating in Maine.

Refer to Tables 1 through 12 in the state of Maine section of Appendix D for facts and data used to evaluate the bank's lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in Portland AA is adequate considering the bank's corporate banking focus and highly competitive market. Key's competitors include 302 home mortgage and 57 small business lenders. Of these competitors, only 20 are depository institutions. Key ranks third among the depository institutions with an 8.21% deposit market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage rank is 27th with a 1.32% market share, and small business rank is 16th with a 1.56% market share. A national credit card company with 19% of the market share dominates the small business market.

Distribution of Loans by Income Level of the Geography - The overall geographic distribution of loans is good. HMDA distribution is good based on excellent home purchase and good home refinance loan distributions. Home improvement loan distribution is good. In our analysis, we gave minimal consideration to performance in low-income geographies given that they comprise a very small percentage of owner-occupied housing units. Distribution of small loans to businesses is good.

Distribution of Loans by Income Level of the Borrower - Overall borrower distribution of loans is adequate. HMDA distribution is adequate based on good home purchase and adequate home refinance loan distributions. Home improvement loan distribution is adequate. The percentage of home purchase loans made to low-income borrowers is significantly less than the percentage of those families living in the AA; but performance is considered adequate. The percentage of home refinance and home improvement loans made to low-income borrowers is considerably less than the percentage of those families; therefore, performance is considered poor. In developing our conclusions, we considered the high percentage of families living at or below poverty. Also, HMDA performance to moderate-income borrowers is less than, meets or exceeds the percentage of those families. For the primary HMDA products, market share for low- and moderate-income borrowers was near to or exceeded the overall market share. Distribution of small loans to businesses is adequate.

Community Development Lending (CD) - CD lending has a positive impact on lending performance in the AA. Key made 15 CD loans totaling \$42 million. CD lending activity targets community needs: community services (64% of loans), revitalization and stabilization (29% of loans), and affordable housing (7% of loans).

Product Innovation and Flexibility - Product innovation and flexibility do not have an impact in this AA. Key originated 190 loans totaling \$680M through a statewide auto loan program for low- and moderate-income individuals leaving public assistance and entering the workforce.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the non-MSA AA is not inconsistent with the overall High Satisfactory performance noted in the state of Maine. Performance in the Bangor and Lewiston AAs is weaker due to lower geographic distribution. Small business loan volume in the Lewiston AA was insufficient for a meaningful analysis and conclusion.

INVESTMENT TEST

Key's overall Investment Test performance in Maine is High Satisfactory. Based on a full-scope review, performance in the Portland AA which accounts for 61% of deposits is excellent. Performance in the limited-scope areas diminished the overall Investment Test rating. Statewide/regional investments did not impact the overall Investment Test rating in Maine.

Refer to Table 14 in the state of Maine section and the Additional Qualified Investments table of Appendix D for facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made seven investments in the AA totaling \$6.1 million and 13 donations totaling \$77.5 thousand. We considered the continuing impact from 43 prior period investments with outstanding balances of \$10.2 million as of September 30, 2011. These investments were responsive to affordable housing and revitalization and stabilization needs in the AA.

Conclusions for Areas Receiving Limited Scope Reviews

Based on the limited-scope reviews, the Investment Test performance in the Lewiston AA is not inconsistent with the overall High Satisfactory rating noted in the state of Maine. Performance in Bangor and the non-MSA AAs is weaker due to lower investments.

SERVICE TEST

Key's overall Service Test performance in Maine is High Satisfactory. Based on a full-scope review, performance in the Portland AA is good. Performance in limited-scope AAs did not impact the Service Test rating in Maine.

Refer to Table 15 in the state of Maine section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full Scope Reviews

Bank branches are accessible to essentially all portions of the Portland AA. While the bank has no branches in low-income geographies, the population percentage in these areas is very small. As a result, greater consideration is given to performance in moderate-income geographies where population is significant; and the percentage of bank branches exceeds the percentage of people living there. Services and products offered by bank branches are consistent across the bank network. During the evaluation period the bank did not open or close any branches. Banking hours are good and consistent regardless of location. The overall distribution of the bank's deposit-taking ATMs is adequate. Key provides a good level of CD services.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, Service Test performance in the Bangor AA is not inconsistent with the overall High Satisfactory performance noted in the state of Maine. Performance in the non-MSA AA is higher due to better branch distribution in moderate-income geographies. This AA does not contain low-income geographies. Performance in the Lewiston AA is weaker due to lower branch distribution.

State of Michigan

CRA Rating for Michigan: Satisfactory

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

Major factors that support this rating are primarily based on performance in the full scope Ann Arbor AA, and include:

- Good Lending Test performance based on adequate lending activity, and good geographic and borrower distribution.
- Poor Investment Test performance based on the availability of limited qualified investment opportunities and poor current and prior period investments volumes.
- Adequate Service Test performance based on adequate branch distribution. The bank provided a poor level of CD services.

Description of Institution's Operations in Michigan

Key has 32 branches and 36 full service ATMs in the state of Michigan. Key delineated six AAs within the state. The AAs include four MSAs and two non-metropolitan areas. Statewide, the bank has \$1 billion in deposits. This represents 1.8% of the bank's total deposits. Michigan is the ninth largest rating area for the bank. Within Michigan, 56.6% of the bank's deposits are concentrated in the Ann Arbor MSA (Ann Arbor AA) where Key also has ten branches and 12 deposit-taking ATMs. As a result, this AA received a full-scope review. It carries the greatest weight in Michigan's state performance ratings. The remaining MSAs and combined non-MSA are analyzed using limited-scope procedures.

LENDING TEST

Key's overall Lending Test performance in Michigan is High Satisfactory. Based on a full-scope review, performance in the Ann Arbor AA is good. CD lending in the Ann Arbor AA has a neutral impact on lending performance. Performance in the limited-scope AAs does not impact the Lending Test rating in Michigan.

Refer to Tables 1 through 12 in the state of Michigan section of Appendix D for facts and data used to evaluate the bank's lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in the Ann Arbor AA is adequate considering the bank's corporate banking focus and highly competitive market. Key's competitors include 246 home mortgage and 53 small business lenders. Of these numerous competitors, only 19 are depository

institutions. Key ranks third among depository institutions with an 8.21% deposit market share. We noted lower volumes in lending market rankings and market shares. When compared to the bank's deposit rank of fourth and market share (9.53%), we noted lower volumes in lending market rankings and market shares. Home mortgage rank is 29 with a .59% market share, and small business rank is 20 with a .58% market share. In our analysis, we considered the 19 depository institutions versus a competitive market of financial institutions, 246 for home mortgage loans and 53 for small business loans. A national credit card company with 27% market share dominates the small business market.

An analysis of home improvement lending was not considered meaningful due to an insufficient number of loans originated during the review period.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is good. HMDA distribution is good based on excellent home purchase and adequate home refinance loan distributions. Distribution of small loans to businesses is good.

Distribution of Loans by Income Level of the Borrower – The overall borrower distribution of loans is good. HMDA distribution is excellent for all loan products. Distribution of small loans to businesses is adequate.

Community Development Lending (CD) – CD lending has a neutral impact on lending performance in the AA. Key made one CD loan totaling \$4 million which targets the affordable housing needs of the community.

Product Innovation and Flexibility - No specific product that was innovative or flexible was identified in this AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, Lending Test performance in the Detroit, Monroe, and Warren AAs is not inconsistent with the overall High Satisfactory performance noted for the state of Michigan. Performance in the non-MSA AA is weaker due to lower geographic distribution. HMDA loan volume in the Detroit AA and small business loan volume in the non-MSA AA were insufficient for a meaningful analysis and conclusion.

INVESTMENT TEST

Key's overall Investment Test performance in Michigan is Needs to Improve. Based on a full-scope review, performance in the Ann Arbor AA is poor. Performance in the limited-scope AAs and statewide/regional investments does not impact the overall Investment Test rating in Michigan.

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

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, limited qualified investment opportunities existed. However, Key made only four donations totaling \$25 thousand in the AA. We also considered the continuing impact from six prior period investments with outstanding balances of \$884 thousand as of September 30, 2011.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the Investment Test performance in the Detroit, Warren, and non-MSA AAs is stronger than the overall Needs to Improve performance noted in the state of Michigan due to higher investments. Performance in the Monroe AA is weaker due to fewer investments.

SERVICE TEST

Key's overall Service Test performance in Michigan is Low Satisfactory based on a full-scope review, performance in the Ann Arbor AA is adequate. Performance in limited-scope AAs did not impact the state rating.

Refer to Table 15 in the state of Michigan section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

Bank branches are reasonably accessible to essentially all portions of the Ann Arbor AA. Services and products offered by bank branches are consistent across the bank network. During the evaluation period the bank did not open or close any branches. Banking hours are generally consistent regardless of location. The overall distribution of the bank's deposit-taking ATMs is adequate. No CD services are noted for this AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the Detroit, Monroe, and the non-MSA AAs is not inconsistent with the overall Low Satisfactory performance noted in the state of Michigan. Performance in the Warren AA is stronger because of better branch distribution in low- and moderate-income geographies.

State of Oregon

CRA Rating for Oregon: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: High Satisfactory

Major factors that support this rating are primarily based on performance in the full scope Salem AA, and include:

- Good Lending Test performance based on adequate lending activity, adequate geographic distribution and good borrower distribution.
- Adequate investment performance based on poor current and prior period investments volumes in the full-scope AA. However, significantly stronger performance in three limited-scope AAs which account for 72% of deposits elevates the overall investment test rating for the state.
- Good Service Test performance based on adequate branch distribution that is enhanced by stronger performance in the limited scope AAs that account for 48% of state deposits. The bank also provides an adequate level of CD services.⁶

Description of Institution's Operations in Oregon

Key has 31 branches and 49 full service ATMs in the state of Oregon. Key delineated seven AAs within the state. The AAs include four MSAs and three non-metropolitan areas. Statewide, the bank has \$952 million in deposits. This represents 1.6% of the bank's total deposits. Oregon is the eleventh largest rating area for the bank. Within Oregon, 26.4% of the bank's deposits in the state are concentrated in the Salem MSA (Salem AA). Key also has nine branches and ten deposit-taking ATMs there. As a result, this AA received a full-scope review; and it carries the greatest weight in Oregon's state performance ratings. Notably the Eugene-Springfield MSA has significant deposits in the state, 25.6%. The Eugene-Springfield MSA, remaining MSAs, and the combined non-metropolitan AAs are analyzed using limited-scope procedures.

Key originated a small number of small farm loans. However, the volume is sufficient to justify an analysis of this product. As discussed in the Description of Evaluation Process section of this Evaluation, this category has a limited impact on our conclusions regarding lending performance.

⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

LENDING TEST

Key's overall Lending Test performance in Oregon is High Satisfactory. Based on a full scope review, performance in the Salem AA is good. No CD loans were made in the AA during the review period. Performance in the limited-scope AAs does not impact the Lending Test rating in Oregon.

Refer to Tables 1 through 12 in the state of Oregon section of Appendix D for facts and data used to evaluate the bank's lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in Salem AA is adequate considering the bank's corporate banking focus and highly competitive market. Key's competitors include 252 home mortgage and 40 small business lenders. Of these numerous competitors, only 17 are depository institutions. Key ranks seventh among the depository institutions with a 6.26% deposit market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage and small business lending rank are both 13th with market shares of 1.60% and 1.07%, respectively. Three lenders (two large banks and a national credit card company) with 60% market share, dominate the small business market.

An analysis of home improvement was not considered meaningful due to an insufficient number of loans originated during the review period. Although Key originated enough small farm loans in the AA to result in a meaningful analysis, we applied minimal weighting to this loan category. As detailed in the Description of Evaluation Process section of this Evaluation, this category has limited impact on our conclusions regarding lending performance.

Distribution of Loans by Income Level of the Geography - The overall geographic distribution of loans is adequate. HMDA loan distribution is adequate based on good home purchase and adequate home refinance loan distributions. HMDA market shares in moderate-income geographies exceeded the overall market shares. The bank did not make any HMDA loans in low-income geographies. However, performance in low-income geographies is given minimal consideration being that they comprise a negligible percentage of owner-occupied housing units. Distribution of small loans to businesses is good and for small loans to farms is very poor.

Distribution of Loans by Income Level of the Borrower - The overall borrower distribution of loans is good. HMDA loan distribution is good based on good home purchase and home refinance loan distributions. The percentages of home purchase and home refinance loans made to low-income borrowers is significantly less than the percentage of those families; and performance is considered adequate. The percentage of home improvement loans made to low-income borrowers is less than the percentage of those families; and performance is considered good. We gave consideration to the high percentage of families in the AA living at or below poverty. Also, HMDA performance to moderate-income borrowers exceeds the percentage of those families. Distributions of small loans to businesses and small loans to farms are adequate.

Community Development Lending - The bank did not originate any CD loans in this AA during the review period.

Product Innovation and Flexibility – No specific product is identified in this AA that is innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Eugene Springfield and Medford AAs is not inconsistent with the overall High Satisfactory performance noted for the state of Oregon. Performance in the non-MSA AAs is weaker due to lower geographic and borrower distributions. HMDA and small business loan volume in the Corvallis AA were insufficient for a meaningful analysis and conclusion.

INVESTMENT TEST

Key's overall Investment Test performance in Oregon is Low Satisfactory. Based on a full-scope review, performance in the Salem AA is poor. Performance in the limited-scope AAs impacted the Investment Test rating in Oregon. Three limited-scope AAs comprising 72% of the state's deposits had excellent performance. This elevated the overall investment rating in Oregon. Statewide/regional investments do not impact the overall Investment Test rating in Oregon.

Refer to Table 14 in the state of Oregon section and the Additional Qualified Investments table of Appendix D for facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made one donation totaling \$5 thousand. We considered the continuing impact from four prior period investments with outstanding balances of \$122 thousand as of September 30, 2011.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the Investment Test performance in the Eugene, Medford and non-MSA AAs is stronger than the overall Low Satisfactory performance for the state of Oregon due to higher investments. Performance in the Corvallis AA is weaker due to fewer investments.

SERVICE TEST

Key's overall Service Test performance in Oregon is High Satisfactory. Performance in the Salem AA is adequate. Stronger performance in limited-scope AA enhances performance in the state of Oregon to good.

Refer to Table 15 in the state of Oregon section of Appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Conclusions for Areas Receiving Full-Scope Reviews

Bank branches are reasonably accessible to essentially all portions of the Salem AA. While the bank has no branches in low-income geographies, the population percentage in these areas is very small. As a result, greater consideration is given to performance in moderate-income geographies where the population percentage is significant; and the percentage of bank branches is less than the percentage of people living in the area. Services and products offered by bank branches are consistent across the bank network. During the evaluation period, the bank opened one branch in upper income geography. No branches were closed. Banking hours are generally consistent regardless of location. The overall distribution of the bank's deposit-taking ATMs is adequate. Key provides an adequate level of CD services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the Eugene and Medford AAs is not inconsistent with the overall High Satisfactory performance noted for the state of Oregon. Performance in the Corvallis AA is stronger due to higher branch distribution in moderate-income geographies. There are no low-income geographies in this AA. Performance in the non-MSA AA is weaker due to lower branch distribution in moderate-income geographies. There are no low-income geographies in this AA.

State of Utah

CRA Rating for Utah: Satisfactory

The lending test is rated: High Satisfactory
The investment test is rated: Outstanding
The service test is rated: High Satisfactory

Major factors that support this rating are primarily based on performance in the full scope Salt Lake City AA, and include:

- Good Lending Test performance based on adequate lending activity, good geographic distribution and adequate borrower distribution. In addition, CD loans had a positive impact on lending performance.
- Excellent investment performance based on excellent current and prior period investments volumes.
- Good Service Test performance based on good branch distribution. In addition, Key’s record of opening branches has improved the accessibility of delivery systems in low-income geographies. ATM distribution is good. The bank also provides an adequate level of CD services.

Description of Institution’s Operations in Utah

Key has 40 branches and 47 full service ATMs in the state of Utah. Key delineated seven AAs within the state. The AAs include four MSAs and three non-metropolitan areas. Statewide, the bank has \$1.8 billion in deposits. This represents 3% of the bank’s total deposits. Utah is the eighth largest rating area for the bank. Within Utah, 82.7% of the bank’s deposits are concentrated in the Salt Lake City MSA (Salt Lake City AA) where Key also has 23 branches and 25 deposit-taking ATMs. As a result, this AA received a full-scope review. It also carries the greatest weight in Utah’s state performance ratings. The remaining MSAs and the combined non-MSA were analyzed using limited-scope procedures.

LENDING TEST

Key’s overall Lending Test performance in Utah is High Satisfactory. Based on a full scope review, performance in the Salt Lake City AA is adequate. CD lending in the Utah AA has a positive impact on lending performance. Performance in the limited-scope AAs and statewide or regional CD loans does not impact the Lending Test rating in Utah.

Refer to Tables 1 through 12 in the state of Utah section and CD Additional Activity Table in Appendix D for facts and data used to evaluate the bank’s lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in the Salt Lake City AA is good considering the bank's corporate banking focus and highly competitive market. Key's competitors include 312 home mortgage and 70 small business lenders. Of these numerous competitors, only 50 are depository institutions. Key ranks 16th among the depository institutions with a .55% deposit market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage lending rank is 30th with a .59% market share, and small business rank is 13th with a .54% market share. Three lenders (two large banks and a national credit card company) with 73% market share dominate the small business market. The volume of small loans to farms is insufficient to result in a meaningful analysis or conclusion.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is good. HMDA loan distribution is adequate based on good home purchase and poor home refinance loan distributions. Home improvement loan distribution is poor. The bank did not make any HMDA loans in low-income geographies. However, performance in low-income geographies is given minimal consideration being that they comprise a very small percentage of owner-occupied housing units. Distribution of small loans to businesses is excellent.

Distribution of Loans by Income Level of the Borrower – The overall borrower distribution of loans is adequate. HMDA loan distribution is adequate based on good home purchase and adequate home refinance loan distributions. Home improvement loan distribution is poor. The percentage of home purchase loans made to low-income borrowers is significantly less than the percentage of those families. Therefore, performance is adequate. The percentage of home refinance loans is considerably less. This results in performance that is considered poor. We gave consideration to the high percentage of families in the AA living at or below poverty and a lack of affordable housing. The percentage of home improvement loans is poor. Also, HMDA performance to moderate-income borrowers exceeds the percentage of those families. Distribution of small loans to businesses is adequate.

Community Development Lending (CD) – CD lending has a positive impact on overall lending performance in the AA. Key made five CD loans totaling \$18 million. CD lending targets the community's affordable housing needs.

Product Innovation and Flexibility – No specific product is identified in this AA that is viewed as innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the Ogden AA is not inconsistent with the overall High Satisfactory performance noted for the state of Utah. Performance in the Provo Orem AA is weaker due to lower borrower distributions and CD loans. HMDA and small business loan volume in the Logan and non-MSA AAs were insufficient for a meaningful analysis or conclusion.

INVESTMENT TEST

Key's overall Investment Test performance in Utah is Outstanding. Based on a full-scope review, performance in the Salt Lake City AA is excellent. Performance in the limited-scope AA and statewide/regional investments does not impact the overall Investment Test rating in Utah.

Refer to Table 14 in the state of Utah section and Additional Qualified Investments table of Appendix D for facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made two investments in the Salt Lake City AA totaling \$13.7 million and 31 donations totaling \$280 thousand. We considered the continuing impact from 12 prior period investments with outstanding balances of \$18.1 million as of September 30, 2011. These investments are responsive to affordable housing and revitalization and stabilization needs in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, Investment Test performance in the Logan, Ogden, and non-MSA AAs is not inconsistent with the overall Outstanding performance noted for the state of Utah. Performance is weaker in the Provo AA due to fewer investments.

The bank made investments in funds throughout the State of Utah and in the broader regional area. These investments, while not located directly within the bank's AAs; either have the potential to benefit the AAs or the broader statewide or regional area. Key had one statewide investment with a remaining balance of \$393 thousand in a prior period.

SERVICE TEST

Key's overall Service Test performance in Utah is High Satisfactory. Based on a full-scope review, performance in the Salt Lake City AA is good. Performance in limited-scope AAs did not impact the state rating in Utah.

Refer to Table 15 in the state of Utah 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.

Conclusions for Areas Receiving Full-Scope Reviews

Bank branches are accessible to essentially all portions of the Salt Lake City AA. Services and products offered by bank branches are consistent across the bank network. Branch openings and closings have improved access to banking services within low-income areas. During the evaluation, the bank opened two offices in the AA including one in a low-income geography. In addition, the bank closed one branch in a moderate-income geography. Banking hours are generally consistent regardless of location. Key provides an adequate level of CD services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the Ogden and non-MSA AAs is stronger than the overall High Satisfactory performance noted for the state of Utah due to higher branch distribution in low- and moderate-income geographies. Performance in the Logan and Provo AAs is weaker due to lower branch distribution in low-and moderate-income geographies.

State of Vermont

CRA Rating for Vermont: **Satisfactory**

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

The investment test is rated: **Outstanding**

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

Major factors that support this rating are primarily based on performance in the full scope Burlington AA, and include:

- Good Lending Test performance based on adequate lending activity, adequate geographic distribution and good borrower distribution. In addition, CD loans had a positive impact on lending performance.
- Excellent Investment Test performance is based on excellent current and prior period investments volumes.
- Good Service Test performance is based on good branch distribution. The bank also provides an adequate level of CD services.

Description of Institution's Operations in Vermont

Key has 13 branches and 22 full service ATMs in the state of Vermont. Key delineated five AAs within the state. The AAs include one MSA and four non-metropolitan areas. Statewide, the bank has \$707 million in deposits that represents 1.2% of the bank's total deposits. Vermont is the fifteenth largest rating area for the bank. Within Vermont, 79.6% of the bank's deposits are concentrated in the Burlington-South Burlington MSA (Burlington AA) where Key has nine branches and 15 deposit-taking ATMs. As a result, this AA received a full-scope review. It also carries the greatest weight in arriving at Vermont's state performance ratings. The remaining combined non-metropolitan AAs is analyzed using limited-scope procedures.

LENDING TEST

Key's overall Lending Test performance in Vermont is High Satisfactory. Based on a full-scope review, performance in the Burlington AA is good. CD lending in the Burlington AA has a positive impact on lending performance. Performance in the limited-scope AA does not impact the state rating in Vermont.

Refer to Tables 1 through 12 in the state of Vermont section of Appendix D for facts and data used to evaluate the bank's lending.

Conclusions for Area Receiving Full-Scope review

Lending Activity - Lending activity in Burlington AA is adequate considering the bank's corporate banking focus and highly competitive market. Key's competitors include 133 home mortgage and

37 small business lenders. Of these numerous competitors, only 11 are depository institutions. Key ranks third among the depository institutions with a 14.3% deposit market share. We noted lower volumes in lending market rankings and market shares. Key's home mortgage lending rank is 20th with a 1.09% market share, and small business rank is 13th with a 1.20% market share. A national credit card company and a local bank dominate the small business market with 46% market share.

An analysis of home improvement was not considered meaningful due to an insufficient number of loans originated during the review period.

Distribution of Loans by Income Level of the Geography – The overall distribution of loans is adequate. HMDA loan distribution is good based on good home purchase and adequate home refinance distributions. Distribution of small loans to businesses is adequate. In our analysis, we gave minimal consideration to performance in low-income geographies being that they comprise a very small percentage of owner-occupied housing units.

Distribution of Loans by Income Level of the Borrower – The overall borrower distribution of loans is good. HMDA loan distribution is excellent based on good home purchase and excellent home refinance loan distributions. The percentage of home purchase loans made to low-income borrowers is significantly less than the percentage of those families; and performance is considered adequate. The percentage of home refinance loans made to low-income borrowers is less than the percentage of those families; and performance is considered good. We gave consideration to the high percentage of families in the AA living at or below poverty. Also, HMDA performance to moderate-income borrowers exceeds the percentage of those families. Distribution of small loans to businesses is adequate.

Community Development Lending (CD) – CD lending has a positive impact on lending performance in the AA. Key made 17 CD loans totaling \$186 million. CD lending targets the needs of the community including: affordable housing (98% of loans), revitalization and stabilization (2% of loans), and community services (less than 1% of loans).

Product Innovation and Flexibility – No specific product is identified in this AA that is innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, Lending Test performance in the non-MSA AA is not inconsistent with the overall High Satisfactory performance noted in the state of Vermont.

INVESTMENT TEST

Key's overall Investment Test performance in Vermont is Outstanding. Based on a full-scope review, performance in the Burlington AA is excellent. Performance in the limited-scope AA and statewide/regional investments does not impact the Investment Test rating in Vermont.

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

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Key made two investments in the AA totaling \$9.9 million and donations to six organizations totaling \$30 thousand. We considered the continuing impact from eight prior period investments with outstanding balances of \$3.9 million as of September 30, 2011. These investments are responsive and addressed affordable housing and revitalization and stabilization needs in the AA.

The bank made investments in funds throughout the State of Vermont and in the broader regional area. These investments, while not located directly within the bank's AAs; either have the potential to benefit the AAs or the broader statewide or regional area. Key had two statewide investments with a remaining balance of \$200 thousand in a prior period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited scope-review, the Investment Test performance in the non-MSA AA is weaker than the overall Outstanding performance noted in the state of Vermont due to fewer investments.

SERVICE TEST

Key's overall Service Test performance in Vermont is High Satisfactory. Based on a full-scope review, performance in the Burlington AA is good. Performance in the limited-scope AA does not impact the Service Test rating in Vermont.

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

Conclusions for Areas Receiving Full-Scope Reviews

Bank branches are accessible to essentially all portions of the Burlington AA. While the bank has no branches in low-income geographies, the population percentage in these areas is very small. As a result, greater consideration is given to performance in moderate-income geographies where the population percentage is significant. The percentage of bank branches exceeds the percentage of people living in these geographies. Services and products offered by bank branches are consistent across the bank network. During the evaluation period the bank did not open or close any branches in the Burlington MSA. Banking hours are consistent regardless of location. The overall distribution of the bank's deposit-taking ATMs is adequate. Key provides an adequate level of CD services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Service Test performance in the non-MSA AA is stronger than the overall High Satisfactory performance noted for the state of Vermont. The stronger performance

is due to higher branch distribution in moderate-income geographies. The non-MSA AA does not contain low-income geographies.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/08 to 06/30/11 Investment and Service Tests and CD Loans: (07/01/08 to 09/30/11)		
Financial Institution			Products Reviewed
KeyBank, National Association (“Key”) Cleveland, Ohio			Home Purchase, Home Improvement, Refinance, Small Loans to Businesses, and Small Loans to Farms
Affiliate(s)	Affiliate Relationship	Products Reviewed	
Key Community Development Corporation	Subsidiary of KeyBank, National Association	Community Development Loans Community Development Investments Community Development Services	
List of Assessment Areas and Type of Examination			
Assessment Area	MSA/MD	Type of Exam	Other Information
Primary Rating Areas			
Ohio			
Cleveland-Elyria-Mentor MSA	17460	Full scope	
Akron MSA	10420	Limited scope	
Canton-Massillon MSA	15940	Limited scope	
Columbus MSA (partial)	18140	Limited scope	
Dayton MSA	19380	Limited scope	
Mansfield MSA	31900	Limited scope	
Sandusky MSA	41780	Limited scope	
Springfield MSA	44220	Limited scope	
Toledo MSA	45780	Limited scope	
Youngstown-Warren-Boardman MSA	49660	Limited scope	
OH Non-MSA	NA	Limited scope	
New York			
Albany-Schenectady-Troy NY MSA	10580	Full-scope	
Buffalo-Niagara Falls NY MSA	15380	Limited-scope	
Glen Falls NY MSA (partial)	24020	Limited scope	
Kingston NY MSA	28740	Limited scope	
New York-White Plains NY MSA (partial)	35644	Limited scope	
Poughkeepsie-Newburgh-Middletown NY MSA	39100	Limited scope	
Rochester NY MSA (partial)	40380	Limited scope	
Syracuse NY MSA	45060	Limited scope	
Utica-Rome NY MSA (partial)	46540	Limited scope	
NY Non-MSA	NA	Limited scope	

<u>Washington</u>		
Seattle-Bellevue MSA	42644	Full scope
Bellingham MSA	13380	Limited scope
Bremerton MSA	14740	Limited scope
Kennewick-Pasco-Richland MSA (partial)	28420	Limited scope
Longview MSA	31020	Limited scope
Mt Vernon MSA	34580	Limited scope
Olympia MSA	36500	Limited scope
Tacoma MD	45104	Limited scope
Wenatchee-East Wenatchee MSA (partial)	48300	Limited scope
Yakima MSA		
WA Non-MSA	49420	Limited scope
	NA	Limited-scope
<u>Non-Primary Rating Areas</u>		
Cincinnati-Middletown OH-KY-IN MMSA		
Portland-Vancouver-Hillsboro OR-WA MMSA	17140	Full-scope
	38900	Full scope
<u>Alaska</u>		
Anchorage MSA		
Fairbanks MSA	11260	Full scope
AK Non-MSA	21820	Limited scope
	NA	Limited scope
<u>Colorado</u>		
Denver MSA (partial)		
Boulder MSA	19740	Full scope
Colorado Springs (partial)	14500	Limited scope
Ft Collins MSA	17820	Limited scope
Greeley MSA	22660	Limited scope
CO Non-MSA	24540	Limited scope
	NA	Limited-scope
<u>Connecticut</u>		
Bridgeport-Stamford MSA (partial)		
	14860	Full-scope
<u>Florida</u>		
Naples-Marco Island MSA		
Cape Coral – Fort Meyers MSA	34940	Full scope
West Palm Beach MD	15980	Limited scope
	48424	Limited scope
<u>Idaho</u>		
Boise-Nampa MSA (partial)		
Idaho Falls MSA	14260	Full scope
Pocatello MSA	26820	Limited scope
ID Non-MSA	38540	Limited scope
	NA	Limited scope
<u>Indiana</u>		
Indianapolis- Carmel MSA		
Anderson MSA	26900	Full scope
Bloomington MSA	11300	Limited scope
Elkhart-Goshen MSA	14020	Limited scope
Kokomo MSA	21140	Limited scope
South Bend-Mishawaka MSA	29020	Limited scope
IN Non-MSA	43780	Limited scope
	NA	Limited scope
<u>Maine</u>		

Portland-South Portland-Biddeford MSA			
Bangor MSA	38860	Full scope	
Lewiston-Auburn MSA	12620	Limited scope	
MA Non-MSA	30340	Limited scope	
	NA	Limited scope	
<u>Michigan</u>			
Ann Arbor MSA			
Detroit-Livonia-Dearborn MD	11460	Full scope	
Monroe MSA	19804	Limited scope	
Warren-Troy-Farmington Hills MD	33780	Limited scope	
(partial)	47644	Limited scope	
MI Non-MSA			
	NA	Limited scope	
<u>Oregon</u>			
Salem MSA			
Corvallis MSA	41420	Full scope	
Eugene-Springfield MSA	18700	Limited scope	
Medford MSA	21660	Limited scope	
OR Non-MSA	32780	Limited scope	
	NA	Limited scope	
<u>Utah</u>			
Salt Lake City MSA			
Logan MSA	41620	Full scope	
Ogden-Clearfield MSA	30860	Limited scope	
Provo-Orem MSA	36260	Limited scope	
Utah Non-MSA	39340	Limited scope	
	NA	Limited scope	
<u>Vermont</u>			
Burlington-South Burlington MSA			
VT Non-MSA	15540	Full scope	
	NA	Limited scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS KeyBank, N. A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
KeyBank, N.A.	Outstanding	High Satisfactory	Outstanding	Outstanding
Multistate Metropolitan Area or State:				
Primary Rating Areas:				
Ohio	Outstanding	Outstanding	Outstanding	Outstanding
New York	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Washington	Outstanding	High Satisfactory	Outstanding	Outstanding
Non-Primary Rating Areas:				
Cincinnati Multistate	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Portland Multistate	High Satisfactory	Outstanding	Outstanding	Outstanding
Alaska	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Colorado	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Connecticut	Needs to Improve	Low Satisfactory	Low Satisfactory	Needs to Improve
Florida	Needs to Improve	Needs to Improve	Low Satisfactory	Needs to Improve
Idaho	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Indiana	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Maine	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Michigan	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
Oregon	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Utah	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Vermont	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

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

Appendix C: Market Profiles for Full-Scope Areas

17460 Cleveland OH

Demographic Information for Full-Scope Area: 17460 Cleveland-Elyria-Mentor MSA										
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Geographies (Census Tracts/BNAs)	693	16.02	20.06	38.82	23.81	1.30				
Population by Geography	2,148,143	9.74	16.77	43.79	29.67	0.03				
Owner-Occupied Housing by Geography	580,878	4.83	12.41	48.22	34.54	0.00				
Businesses by Geography	131,024	8.01	14.96	40.66	35.66	0.71				
Farms by Geography	3,154	2.19	6.59	50.63	40.49	0.10				
Family Distribution by Income Level	562,913	20.34	18.08	22.21	39.37	0.00				
Distribution of Low- and Moderate-Income Families throughout AA Geographies	216,274	17.82	24.67	41.67	15.84	0.00				
Median Family Income	52,660	Median Housing Value		121,274						
HUD Adjusted Median Family Income for 2011	62,800						Unemployment Rate		8.2%	
Households Below the Poverty Level	11%									

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

Source: 2000 U.S. Census and 2011 HUD updated MFI.

The Cleveland AA is comprised of the entire Cleveland MSA. The MSA encompasses five contiguous counties including Cuyahoga, Geauga, Lake, Lorain and Medina. The MSA contains 693 census tracts of which approximately 16% are low-income, 20% moderate-income, 39% middle-income, and 24% upper-income. Additionally, approximately 1% of the census tracts in the MSA does not have income information and characterized as NA. The MSA's 2011 HUD adjusted median family income is \$62,800. Eleven percent of MSA households fall below the poverty level.

As of June 30, 2011, Key had \$11 billion in deposits in the MSA and it is the area's leading deposit taker with a 21.67% market share. Banking competition is strong with 43 FDIC-insured institutions that operate 722 branches. Key's main deposit competitors are PNC, N.A. and Third Federal Savings and Loan with an 11.30% and 11.23% market share, respectively. Key operates 78 branches and 170 ATMs (136 are deposit-taking) in the MSA.

The city of Cleveland is the major metropolitan city within the MSA. Its economy is undergoing slow recovery from the recession of 2007-08. Although the unemployment rate of the MSA is 8.2%, the rate of the city of Cleveland is higher at approximately 9 percent. This higher rate is consistent with the state unemployment rate. Foreclosure rates in Cleveland continue to be high as abandoned homes are prevalent in several neighborhoods; and housing values have not yet stabilized. The Cuyahoga County Land Bank was established in 2009 as a non-profit entity tasked to strategically acquire blighted properties and return them to productive use through rehabilitation, sale, or demolition.

Cleveland's economy is moving from manufacturing to predominantly healthcare and service-oriented businesses. The city has a strong healthcare infrastructure; and its top employers are the Cleveland Clinic and University Hospitals. Education and health services comprise 18.4% of total employment, with manufacturing jobs at 11.8% and government jobs at 14.1%. After several years without construction activity in the Cleveland core, several projects are currently underway including a new convention center, medical mart, and downtown casino.

Contacts with community-based organization indicated there are significant credit and community development needs in the MSA, including the following:

Affordable housing credit for first-time homebuyers
Home rehabilitation financing
Re-financing of home mortgages
Financial education
Community development loans
Investments/donations
Individual Development Accounts; matching savings accounts.

Financial institutions have ample community development opportunities for lending, services and investments. These exist through partnerships with various affordable housing agencies and developers, community service organizations, LIHTC and NMTC projects, and other investment opportunities.

10580 Albany NY

Demographic Information for Full-Scope Area: 10580 Albany-Schenectady-Troy MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	214	9.35	20.09	48.13	21.50	0.93
Population by Geography	825,875	7.34	16.25	50.39	25.85	0.17
Owner-Occupied Housing by Geography	212,783	2.78	13.35	53.66	30.21	0.00
Businesses by Geography	58,791	11.82	13.66	48.76	25.75	0.02
Farms by Geography	1,486	1.68	13.80	57.60	26.92	0.00
Family Distribution by Income Level	211,016	19.23	18.71	23.17	38.88	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	80,070	11.40	23.88	49.02	15.70	0.00
Median Family Income	54,944	Median Housing Value		103,896		
HUD Adjusted Median Family Income for 2011	77,000	Unemployment Rate		7.2%		
Households Below the Poverty Level	9%					

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

Source: 2000 U.S. Census and 2011 HUD updated MFI.

The Albany AA is comprised of the entire Albany MSA. The MSA includes five contiguous counties including Albany, Rensselaer, Saratoga, Schenectady, and Schoharie. The MSA contains 214 census tracts of which approximately 9% are low-income, 20% moderate-income, 48% middle-income, and 22% upper-income. Additionally, 0.9% of the census tracts in the MSA does not have income information and characterized as NA. The MSA’s 2011 HUD adjusted median family income is \$77,000. Nine percent of MSA households fall below the poverty level.

As of June 30, 2011, Key had \$7 billion of deposits in the MSA and it is the area’s leading deposit taker with a 33.13% market share. Banking competition is strong with 27 FDIC-insured institutions that operate 327 branches in the MSA. Key’s main deposit competitors are RBS Citizens, N.A., and Trustco. They have 12.57% and 11.41% of the market share, respectively. Key operates 41 branches and 66 ATMs (58 deposit-taking) in the MSA.

As the capital of New York, Albany’s economy is tied to state government with 24.5% of employment centered in the government sector. State and local governments have pared their workforces in response to the state’s ongoing fiscal problems. However, the area’s unemployment rate of 7.2% remains below the state unemployment rate of 8.2%. Education and health services jobs make up 18.9% of total employment with professional and business services jobs at 12%. Albany is a leader in nanotechnology and the city has attracted high-tech firms to the area including a semiconductor chip fabrication plant which lends considerable upside potential to the economic forecast for the area. The housing market is rebounding. This is evidenced by rising sales and prices. Homes in the MSA remain affordable.

Contacts with community-based organizations indicate there are significant credit and community development needs in the MSA, including the following:

First-time homebuyer programs
Home equity lending
Individual Development accounts
Micro-loans for small businesses
Credit for women- and minority-owned businesses.

Financial institutions have some community development opportunities, for lending and investments. Key's LIHTC opportunities were limited; however, other investments in the form of donations to organizations that support affordable housing, first time-home buyer down-payment assistance, transitional housing and financial education did exist. These opportunities exist through partnerships with various affordable housing agencies and developers, community service organizations, and other investment vehicles, including donations.

42644 Seattle WA

Demographic Information for Full-Scope Area: 42644 Seattle-Bellevue-Everett MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	506	2.17	20.75	52.96	24.11	0.00
Population by Geography	2,343,058	1.93	21.89	52.39	23.79	0.00
Owner-Occupied Housing by Geography	577,775	0.49	15.58	55.45	28.48	0.00
Businesses by Geography	196,840	2.55	23.79	47.30	26.35	0.00
Farms by Geography	4,377	1.07	16.43	58.03	24.47	0.00
Family Distribution by Income Level	582,505	18.50	18.70	24.54	38.26	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	216,658	2.61	31.49	51.85	14.06	0.00
Median Family Income	63,951	Median Housing Value		228,785		
HUD Adjusted Median Family Income for 2011.	86,800	Unemployment Rate		9.1%		
Households Below the Poverty Level	8%					

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

Source: 2000 U.S. Census and 2011 HUD updated MFI.

The Seattle AA is comprised of the entire Seattle-Bellevue-Everett metropolitan division. It includes King and Snohomish counties. The Metropolitan Division contains 506 census tracts of which approximately 2% are low-income, 21% moderate-income, 53% middle-income, and 24% percent upper-income. The MSA's 2011~ HUD adjusted median family income is \$86,800. Eight percent of MSA households fall below the poverty level.

As of June 30, 2011, Key had \$5 billion in deposits in the AA and it is the area's fifth largest deposit taker with an 8.41% market share. Banking competition is very strong with 58 FDIC-insured institutions that operate 729 branches. The market is fairly concentrated with three large banks holding 53% of the area's deposits. The leading deposit-taker is Bank of America with a 29.12% market share followed by Wells Fargo Bank, N.A. and U.S. Bank, N.A. with a market share of 12.59% and 11.29%, respectively. Key operates 84 branches and 124 ATMs (118 are deposit-taking) in the AA.

The city of Seattle is the major metropolitan area within the AA. Its economy continues to perform favorably when compared to other areas of the country. Seattle's median family income is above the national average, but housing costs are substantially above the national average, making housing less affordable. The area's unemployment rate is 9.1%. This is in line with the state and Seattle-Tacoma-Bellevue MSA rates of 9.3%. The area boasts a highly trained, well educated work force and a global center for the software industry. Top employers include the Boeing Company and Microsoft. Professional and business services account for 14.1% of Seattle jobs, government jobs provide 14.7%, while manufacturing, and educational and health services provide 11.1% and 11.7%, respectively. The area's two primary drivers are aircraft manufacturing and high-tech. Both of these industry sectors are on the upswing. Aircraft orders have increased, and high-tech industries have recovered the jobs lost during the recession.

Contacts with community-based organizations indicate the primary credit need is for financing and investments in affordable housing projects.

Financial institutions have a moderate level of community development opportunities, particularly for lending and investments through partnerships with various affordable housing agencies and developers, community service organizations, LIHTC projects, and other investment opportunities.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the

percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Tables of Performance Data

Primary Rating Areas

State of Ohio..... D-5

State of New York..... D-19

State of Washington..... D-33

Non-Primary Rating Areas

Cincinnati-Middleton, OH-KY Multistate Metropolitan Area..... D-47

Portland-Vancouver-Beaverton, OR-WA Multistate Metropolitan Area..... D-47

State of Alaska..... D-61

State of Colorado..... D-72

State of Connecticut..... D-86

State of Florida..... D-97

State of Idaho..... D-109

State of Indiana..... D-123

State of Maine..... D-137

State of Michigan..... D-151

State of Oregon..... D-165

State of Utah..... D-178

State of Vermont..... D-192

Table 1. Lending Volume

LENDING VOLUME												
Geography: OHIO												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Cleveland-Elyria-Mentor MSA 17460	40.73	3,059	561,571	1,674	312,795	0	0	50	141,164	4,783	1,015,530	60.62
Limited Review:												
Akron MSA 10420	9.53	675	124,524	438	94,649	1	150	4	7,833	1,118	227,156	6.62
Canton-Massillon MSA 15940	6.94	460	55,476	353	66,532	0	0	1	5,245	814	127,253	3.64
Columbus AA 18140	12.13	780	165,831	620	102,156	0	0	21	34,577	1,421	304,564	8.97
Dayton MSA 19380	7.37	391	53,233	467	109,689	3	645	4	9,052	865	172,619	5.85
Mansfield MSA 31900	1.59	114	11,138	72	13,702	0	0	0	0	186	24,840	1.13
Sandusky MSA 41780	1.58	125	15,403	60	7,010	0	0	0	0	185	22,413	1.25
Springfield MSA 44220	0.73	58	4,061	24	5,248	3	386	1	11,758	86	21,453	0.73
Toledo MSA 45780	11.63	997	104,916	365	51,344	0	0	3	7,889	1,365	164,149	7.63
Youngstown-Warren-Boardman MSA 49660	2.46	157	15,701	128	22,964	1	32	3	5,264	289	43,961	0.68
Non-MSA OH	5.32	434	39,244	178	27,334	10	1,330	2	2,141	624	70,049	2.87
CD loans with potential to benefit one or more AAs								3	62,370			

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OHIO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Cleveland-Elyria-Mentor MSA 17460	1,048	39.22	4.83	7.25	12.41	13.55	48.22	39.03	34.54	40.17	1.19	6.59	2.32	1.02	1.02	
Limited Review:																
Akron MSA 10420	224	8.38	2.76	0.89	18.38	11.61	51.56	50.89	27.30	36.61	0.73	1.06	0.94	0.81	0.55	
Canton-Massillon MSA 15940	189	7.07	0.92	0.00	14.69	13.76	65.16	59.26	19.23	26.98	1.06	0.00	1.94	0.96	1.08	
Columbus AA 18140	346	12.95	3.62	5.20	17.85	20.81	40.69	40.17	37.85	33.82	0.40	2.25	0.80	0.43	0.22	
Dayton MSA 19380	158	5.91	2.33	1.27	18.71	8.23	45.53	39.24	33.44	51.27	0.43	0.00	0.39	0.47	0.41	
Mansfield MSA 31900	36	1.35	0.16	0.00	14.17	11.11	58.08	33.33	27.58	55.56	1.07	0.00	2.38	0.94	1.11	
Sandusky MSA 41780	35	1.31	0.00	0.00	18.57	17.14	65.56	62.86	15.87	20.00	1.96	0.00	2.56	1.78	2.21	
Springfield MSA 44220	23	0.86	1.73	8.70	9.72	4.35	59.32	56.52	29.23	30.43	0.50	0.00	0.00	0.52	0.57	
Toledo MSA 45780	441	16.50	2.74	0.45	13.99	11.56	56.25	51.25	27.01	36.73	1.90	7.14	3.75	1.73	1.78	
Youngstown-Warren-Boardman MSA 49660	42	1.57	2.74	0.00	12.34	4.76	60.78	54.76	24.14	40.48	0.26	0.00	0.00	0.25	0.30	
Non-MSA OH	130	4.87	0.00	0.00	6.94	5.38	73.60	83.08	19.46	11.54	1.03	0.00	1.83	1.04	0.86	

* Based on 2010 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												Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																				
Cleveland-Elyria-Mentor MSA 17460	853	67.91	4.83	10.20	12.41	15.36	48.22	38.57	34.54	35.87	12.99	21.43	12.61	10.68	14.98					
Limited Review:																				
Akron MSA 10420	62	4.94	2.76	1.61	18.38	16.13	51.56	54.84	27.30	27.42	5.54	0.00	5.00	5.83	5.79					
Canton-Massillon MSA 15940	32	2.55	0.92	0.00	14.69	21.88	65.16	59.38	19.23	18.75	3.84	0.00	2.99	4.49	2.74					
Columbus AA 18140	58	4.62	3.62	6.90	17.85	13.79	40.69	34.48	37.85	44.83	2.94	6.67	2.00	2.53	3.40					
Dayton MSA 19380	49	3.90	2.33	4.08	18.71	18.37	45.53	42.86	33.44	34.69	2.89	6.67	6.41	1.79	2.76					
Mansfield MSA 31900	17	1.35	0.16	0.00	14.17	11.76	58.08	52.94	27.58	35.29	6.92	0.00	0.00	6.02	12.90					
Sandusky MSA 41780	11	0.88	0.00	0.00	18.57	9.09	65.56	54.55	15.87	36.36	3.01	0.00	4.55	1.12	9.09					
Springfield MSA 44220	19	1.51	1.73	0.00	9.72	15.79	59.32	36.84	29.23	47.37	4.37	0.00	11.76	2.94	4.84					
Toledo MSA 45780	71	5.65	2.74	7.04	13.99	18.31	56.25	46.48	27.01	28.17	4.18	15.38	3.66	3.83	4.10					
Youngstown-Warren-Boardman MSA 49660	28	2.23	2.74	14.29	12.34	21.43	60.78	46.43	24.14	17.86	1.28	22.22	2.44	0.58	1.28					
Non-MSA OH	56	4.46	0.00	0.00	6.94	8.93	73.60	83.93	19.46	7.14	5.11	0.00	3.13	6.33	0.00					

* Based on 2010 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												Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																				
Cleveland-Elyria-Mentor MSA 17460	1,144	34.71	4.83	1.92	12.41	4.28	48.22	32.95	34.54	60.84	1.02	0.86	0.57	0.86	1.17					
Limited Review:																				
Akron MSA 10420	386	11.71	2.76	0.52	18.38	7.51	51.56	47.15	27.30	44.82	0.96	0.00	1.24	0.89	1.01					
Canton-Massillon MSA 15940	239	7.25	0.92	0.42	14.69	2.09	65.16	67.36	19.23	30.13	1.65	12.50	0.00	1.73	1.66					
Columbus AA 18140	368	11.17	3.62	1.90	17.85	8.15	40.69	36.96	37.85	52.99	0.29	0.39	0.26	0.32	0.27					
Dayton MSA 19380	183	5.55	2.33	1.09	18.71	7.65	45.53	31.15	33.44	60.11	0.58	0.00	0.61	0.49	0.65					
Mansfield MSA 31900	61	1.85	0.16	0.00	14.17	3.28	58.08	57.38	27.58	39.34	0.91	0.00	2.17	1.17	0.47					
Sandusky MSA 41780	79	2.40	0.00	0.00	18.57	7.59	65.56	67.09	15.87	25.32	2.12	0.00	2.17	2.27	1.69					
Springfield MSA 44220	16	0.49	1.73	0.00	9.72	18.75	59.32	68.75	29.23	12.50	0.17	0.00	0.00	0.24	0.10					
Toledo MSA 45780	485	14.71	2.74	0.21	13.99	4.54	56.25	45.15	27.01	50.10	1.51	4.17	0.74	1.28	1.77					
Youngstown-Warren-Boardman MSA 49660	87	2.64	2.74	0.00	12.34	3.45	60.78	51.72	24.14	44.83	0.58	0.00	0.00	0.57	0.63					
Non-MSA OH	248	7.52	0.00	0.00	6.94	2.42	73.60	80.65	19.46	16.94	1.39	0.00	1.06	1.67	0.89					

* Based on 2010 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 JUNE 30, 2011					Market Share (%) by Geography*					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies								
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:																	
Cleveland-Elyria-Mentor MSA 17460	14	53.85	12.81	14.29	25.25	14.29	44.29	57.14	17.66	14.29	6.67	33.33	11.11	4.35	3.45		
Limited Review:																	
Akron MSA 10420	3	11.54	12.03	0.00	24.76	0.00	44.88	33.33	18.33	66.67	9.52	0.00	0.00	6.67	33.33		
Canton-Massillon MSA 15940	0	0.00	6.01	0.00	15.88	0.00	49.84	0.00	28.27	0.00	0.00	0.00	0.00	0.00	0.00		
Columbus AA 18140	8	30.77	12.78	25.00	32.00	0.00	33.78	37.50	21.45	37.50	2.13	0.00	0.00	2.38	4.26		
Dayton MSA 19380	1	3.85	9.11	0.00	22.31	0.00	46.47	100.00	22.11	0.00	0.00	0.00	0.00	0.00	0.00		
Mansfield MSA 31900	0	0.00	1.06	0.00	25.75	0.00	53.27	0.00	19.92	0.00	0.00	0.00	0.00	0.00	0.00		
Sandusky MSA 41780	0	0.00	0.00	0.00	31.32	0.00	48.15	0.00	20.53	0.00	0.00	0.00	0.00	0.00	0.00		
Springfield MSA 44220	0	0.00	4.16	0.00	21.72	0.00	70.62	0.00	3.49	0.00	0.00	0.00	0.00	0.00	0.00		
Toledo MSA 45780	0	0.00	7.15	0.00	21.51	0.00	54.06	0.00	17.28	0.00	0.00	0.00	0.00	0.00	0.00		
Youngstown-Warren-Boardman MSA 49660	0	0.00	7.90	0.00	14.86	0.00	59.75	0.00	17.50	0.00	0.00	0.00	0.00	0.00	0.00		
Non-MSA OH	0	0.00	0.00	0.00	13.50	0.00	72.17	0.00	14.34	0.00	0.00	0.00	0.00	0.00	0.00		

* Based on 2010 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			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Cleveland -Elyria-Mentor MSA 17460	1,649	37.88	6.40	6.00	13.31	13.52	40.66	33.11	38.74	47.36	1.41	1.51	1.81	1.28	1.42	
Limited Review:																
Akron MSA 10420	438	10.06	7.24	7.31	12.95	13.24	44.58	36.99	35.22	42.47	1.40	1.09	2.32	1.16	1.56	
Canton-Massillon MSA 15940	353	8.11	2.83	4.25	13.00	13.31	59.12	47.03	25.05	35.41	2.27	8.33	3.14	1.77	2.62	
Columbus AA 18140	620	14.24	6.55	5.81	17.11	12.90	36.19	35.81	40.15	45.48	0.55	0.68	0.35	0.65	0.56	
Dayton MSA 19380	467	10.73	5.96	12.21	17.75	15.42	39.10	30.84	37.19	41.54	1.40	2.23	1.78	1.06	1.47	
Mansfield MSA 31900	72	1.65	2.54	12.50	15.93	34.72	53.51	27.78	28.02	25.00	0.84	1.15	2.13	0.62	0.49	
Sandusky MSA 41780	60	1.38	0.00	0.00	20.53	16.67	62.78	58.33	16.69	25.00	1.64	0.00	0.75	1.66	2.55	
Springfield MSA 44220	24	0.55	2.31	0.00	14.89	8.33	55.20	66.67	27.60	25.00	0.29	0.00	0.00	0.29	0.47	
Toledo MSA 45780	365	8.39	3.58	0.55	10.54	10.96	52.72	46.85	33.16	41.64	1.18	0.00	1.96	1.01	1.35	
Youngstown-Warren-Boardman MSA 49660	127	2.92	3.74	0.00	11.94	14.17	52.95	40.94	31.19	44.88	0.81	0.00	1.98	0.42	1.17	
Non-MSA OH	178	4.09	0.00	0.00	7.09	10.11	74.52	81.46	18.38	8.43	0.92	0.00	1.23	1.15	0.23	

* Based on 2010 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: OHIO															
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011															
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland-Elyria-Mentor MSA 17460	0	0.00	1.81	0.00	6.21	0.00	52.22	0.00	39.69	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Akron MSA 10420	1	5.56	2.38	0.00	8.96	0.00	60.00	100.00	28.66	0.00	0.00	0.00	0.00	0.00	0.00
Canton-Massillon MSA 15940	0	0.00	0.43	0.00	7.41	0.00	75.55	0.00	16.61	0.00	0.00	0.00	0.00	0.00	0.00
Columbus AA 18140	0	0.00	2.02	0.00	11.52	0.00	49.36	0.00	37.10	0.00	0.00	0.00	0.00	0.00	0.00
Dayton MSA 19380	3	16.67	0.84	0.00	11.33	0.00	58.49	100.00	29.34	0.00	0.00	0.00	0.00	0.00	0.00
Mansfield MSA 31900	0	0.00	0.60	0.00	3.02	0.00	69.56	0.00	26.81	0.00	0.00	0.00	0.00	0.00	0.00
Sandusky MSA 41780	0	0.00	0.00	0.00	6.61	0.00	79.88	0.00	13.51	0.00	0.00	0.00	0.00	0.00	0.00
Springfield MSA 44220	3	16.67	0.95	0.00	3.80	0.00	48.96	66.67	46.30	33.33	1.20	0.00	0.00	2.67	0.00
Toledo MSA 45780	0	0.00	0.55	0.00	4.52	0.00	71.64	0.00	23.29	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren-Boardman MSA 49660	1	5.56	0.97	0.00	4.69	0.00	69.77	100.00	24.57	0.00	4.00	0.00	0.00	4.76	0.00
Non-MSA OH	10	55.56	0.00	0.00	1.01	0.00	71.77	100.00	27.21	0.00	0.82	0.00	0.00	1.35	0.00

* Based on 2010 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		Geography: OHIO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families ***	% BANK Loans ****	% Families **	% BANK Loans ***	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Elyria-Mentor MSA 17460	1,048	39.22	20.34	14.90	18.08	28.27	22.21	19.01	39.37	37.82	1.35	1.58	1.40	0.92	1.52	
Limited Review:																
Akron MSA 10420	224	8.38	19.24	19.73	18.62	25.56	23.21	20.18	38.93	34.53	0.82	1.10	0.86	0.80	0.67	
Canton-Massillon MSA 15940	189	7.07	17.81	12.17	19.41	37.57	24.06	19.58	38.73	30.69	1.22	0.52	1.45	0.84	1.71	
Columbus AA 18140	346	12.95	19.48	18.79	17.88	40.17	22.50	17.92	40.14	23.12	0.48	0.68	0.67	0.35	0.34	
Dayton MSA 19380	158	5.91	19.59	15.19	18.50	19.62	22.25	21.52	39.66	43.67	0.50	0.57	0.49	0.72	0.32	
Mansfield MSA 31900	36	1.35	17.95	16.67	19.32	25.00	23.37	33.33	39.36	25.00	1.14	1.52	1.14	1.31	0.80	
Sandusky MSA 41780	35	1.31	19.00	17.14	18.59	31.43	23.34	22.86	39.07	28.57	2.16	3.61	2.82	0.65	2.14	
Springfield MSA 44220	23	0.86	18.75	8.70	18.55	43.48	24.25	26.09	38.44	21.74	0.56	0.00	1.16	0.78	0.00	
Toledo MSA 45780	441	16.50	20.18	20.00	18.07	31.59	22.67	22.05	39.08	26.36	2.09	2.83	2.14	2.48	1.46	
Youngstown-Warren-Boardman MSA 49660	42	1.57	18.59	4.76	18.34	33.33	22.23	30.95	40.83	30.95	0.29	0.47	0.23	0.24	0.30	
Non-MSA OH	130	4.87	16.43	12.31	18.92	28.46	24.13	17.69	40.52	41.54	1.15	1.15	1.49	0.61	1.31	

* Based on 2010 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 0.1% of loans originated and purchased by bank. 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			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families**	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Elyria-Mentor MSA 17460	853	67.91	20.34	14.70	18.08	22.60	22.21	21.39	39.37	41.31	12.85	8.79	12.05	11.95	15.92	
Limited Review:																
Akron MSA 10420	62	4.94	19.24	13.33	18.62	15.00	23.21	33.33	38.93	38.33	5.49	6.67	3.45	5.61	6.62	
Canton-Massillon MSA 15940	32	2.55	17.81	10.34	19.41	24.14	24.06	27.59	38.73	37.93	3.45	2.86	2.29	3.23	6.02	
Columbus AA 18140	58	4.62	19.48	1.75	17.88	24.56	22.50	24.56	40.14	49.12	2.97	0.00	3.33	3.06	3.68	
Dayton MSA 19380	49	3.90	19.59	10.20	18.50	16.33	22.25	20.41	39.66	53.06	2.97	3.57	3.36	4.10	1.88	
Mansfield MSA 31900	17	1.35	17.95	0.00	19.32	23.53	23.37	23.53	39.36	52.94	7.32	0.00	5.56	10.71	9.09	
Sandusky MSA 41780	11	0.88	19.00	0.00	18.59	54.55	23.34	18.18	39.07	27.27	3.03	0.00	4.00	0.00	6.45	
Springfield MSA 44220	19	1.51	18.75	0.00	18.55	21.05	24.25	21.05	38.44	57.89	4.52	0.00	1.69	4.76	9.43	
Toledo MSA 45780	71	5.65	20.18	20.00	18.07	25.71	22.67	18.57	39.08	35.71	4.12	4.71	4.14	2.83	4.80	
Youngstown-Warren-Boardman MSA 49660	28	2.23	18.59	25.00	18.34	17.86	22.23	17.86	40.83	39.29	1.31	1.28	0.76	0.67	2.26	
Non-MSA OH	56	4.46	16.43	14.29	18.92	26.79	24.13	21.43	40.52	37.50	5.37	5.56	4.94	4.03	6.82	

* Based on 2010 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 2.9% of loans originated and purchased by bank. 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			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Elyria-Mentor MSA 17460	1,144	34.71	20.34	7.81	18.08	15.80	22.21	20.26	39.37	56.13	1.09	1.17	0.99	0.93	1.20	
Limited Review:																
Akron MSA 10420	386	11.71	19.24	9.45	18.62	22.83	23.21	21.00	38.93	46.72	1.09	1.47	1.24	0.91	1.07	
Canton-Massillon MSA 15940	239	7.25	17.81	6.70	19.41	20.54	24.06	25.45	38.73	47.32	1.81	0.92	1.72	1.80	1.99	
Columbus AA 18140	368	11.17	19.48	8.77	17.88	21.10	22.50	27.12	40.14	43.01	0.34	0.39	0.56	0.32	0.29	
Dayton MSA 19380	183	5.55	19.59	5.71	18.50	17.71	22.25	16.00	39.66	60.57	0.63	0.43	0.83	0.43	0.69	
Mansfield MSA 31900	61	1.85	17.95	6.56	19.32	16.39	23.37	34.43	39.36	42.62	1.01	0.00	0.66	1.02	1.37	
Sandusky MSA 41780	79	2.40	19.00	7.59	18.59	17.72	23.34	26.58	39.07	48.10	2.38	2.47	0.37	2.59	3.21	
Springfield MSA 44220	16	0.49	18.75	0.00	18.55	25.00	24.25	31.25	38.44	43.75	0.21	0.00	0.00	0.00	0.44	
Toledo MSA 45780	485	14.71	20.18	11.37	18.07	21.03	22.67	26.82	39.08	40.77	1.54	2.81	1.76	1.41	1.37	
Youngstown-Warren-Boardman MSA 49660	87	2.64	18.59	9.41	18.34	18.82	22.23	25.88	40.83	45.88	0.66	0.59	0.88	0.88	0.45	
Non-MSA OH	248	7.52	16.43	7.20	18.92	22.03	24.13	28.39	40.52	42.37	1.49	1.75	1.75	1.46	1.37	

* Based on 2010 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 4.0% of loans originated and purchased by bank. 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		Geography: OHIO			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Cleveland-Elyria-Mentor MSA 17460	1,674	38.23	64.75	46.30	56.99	18.70	24.31	1.41	2.00
Limited Review:									
Akron MSA 10420	438	10.00	65.28	41.78	51.14	20.78	28.08	1.40	1.78
Canton-Massillon MSA 15940	353	8.06	67.56	53.82	54.67	22.10	23.23	2.27	2.90
Columbus AA 18140	620	14.16	62.49	53.55	63.55	16.61	19.84	0.55	0.70
Dayton MSA 19380	467	10.66	67.84	47.97	46.90	22.70	30.41	1.40	2.14
Mansfield MSA 31900	72	1.64	65.68	51.39	55.56	16.67	27.78	0.84	1.13
Sandusky MSA 41780	60	1.37	64.01	70.00	76.67	5.00	18.33	1.64	2.01
Springfield MSA 44220	24	0.55	69.58	45.83	54.17	12.50	33.33	0.29	0.47
Toledo MSA 45780	365	8.34	64.70	62.19	70.96	11.51	17.53	1.18	1.55
Youngstown-Warren-Boardman MSA 49660	128	2.92	66.45	53.13	53.91	24.22	21.88	0.81	1.24
Non-MSA OH	178	4.06	67.98	51.69	64.04	15.73	20.22	0.92	0.98

* Based on 2010 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 8.34% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OHIO			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Cleveland-Elyria-Mentor MSA 17460	0	0.00	97.38	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Akron MSA 10420	1	5.56	97.68	100.00	0.00	100.00	0.00	0.00	0.00
Canton-Massillon MSA 15940	0	0.00	98.65	0.00	0.00	0.00	0.00	0.00	0.00
Columbus AA 18140	0	0.00	96.66	0.00	0.00	0.00	0.00	0.00	0.00
Dayton MSA 19380	3	16.67	97.81	100.00	33.33	33.33	33.33	0.00	0.00
Mansfield MSA 31900	0	0.00	98.99	0.00	0.00	0.00	0.00	0.00	0.00
Sandusky MSA 41780	0	0.00	98.20	0.00	0.00	0.00	0.00	0.00	0.00
Springfield MSA 44220	3	16.67	98.67	33.33	33.33	66.67	0.00	1.20	0.00
Toledo MSA 45780	0	0.00	97.44	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren-Boardman MSA 49660	1	5.56	98.69	100.00	100.00	0.00	0.00	4.00	6.25
Non-MSA OH	10	55.56	98.79	80.00	40.00	60.00	0.00	0.82	0.63

* Based on 2010 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: OHIO									
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cleveland-Elyria-Mentor MSA 17460	71	32,098	85	71,546	156	103,644	48.41	3	1,476
Limited Review:									
Akron MSA 10420	37	4,530	14	1,482	51	6,013	2.81	0	0
Canton-Massillon MSA 15940	13	2,075	3	7,686	16	9,761	4.56	0	0
Columbus AA 18140	65	18,466	31	21,956	96	40,424	18.88	0	0
Dayton MSA 19380	28	6,668	14	11,599	42	18,266	8.53	0	0
Mansfield MSA 31900	13	1,313	3	16	16	1,329	0.62	0	0
Sandusky MSA 41780	0	0	0	0	0	0	0.00	00	0
Springfield MSA 44220	7	1,514	1	2,060	8	3,574	1.67	60	0
Toledo MSA 45780	29	9,973	13	12,075	42	22,049	10.30	260	0
Youngstown-Warren-Boardman 49660	26	2,134	6	3,376	32	5,530	2.58	0	0
Non-MSA OH	25	3,057	0	0	25	3,056	1.43	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	1	461	0	0	1	461	0.21	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: OHIO Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cleveland-Elyria-Mentor MSA 17460	60.63	78	34.98	10.26	14.10	34.62	41.03	13	4	- 1	2	2	6	9.74	16.77	43.79	29.67
Limited Review:																	
Akron MSA 10420	6.63	20	8.97	10.00	20.00	30.00	40.00	2	2	- 1	0	1	0	6.29	21.45	48.11	24.15
Canton-Massillon MSA 15940	3.64	14	6.28	0.00	7.14	64.29	28.57	0	0	0	0	0	0	1.88	17.09	62.40	18.63
Columbus AA 18140	8.97	27	12.11	7.41	22.22	40.74	29.63	2	1	1	0	0	0	7.94	23.50	37.31	31.25
Dayton MSA 19380	5.85	20	8.97	5.00	20.00	45.00	30.00	0	0	0	0	0	0	3.98	23.85	43.48	28.70
Mansfield MSA 31900	1.13	6	2.69	0.00	50.00	16.67	33.33	0	0	0	0	0	0	2.08	17.95	56.06	23.91
Sandusky MSA 41780	1.25	5	2.24	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	24.16	61.49	14.35
Springfield MSA 44220	0.73	3	1.35	0.00	33.33	66.67	0.00	0	0	0	0	0	0	3.37	15.18	57.07	24.38
Toledo MSA 45780	7.63	28	12.56	3.57	14.29	53.57	28.57	1	0	0	0	1	0	6.14	17.69	52.10	24.07
Youngstown-Warren-Boardman MSA 49660	0.68	6	2.69	0.00	0.00	33.33	66.67	0	0	0	0	0	0	4.61	15.87	58.03	21.49
Non-MSA OH	2.87	16	7.17	0.00	12.50	87.50	0.00	0	0	0	0	0	0	0.00	8.34	73.42	18.23

Table 1. Lending Volume

LENDING VOLUME												
Geography: NEW YORK												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Albany-Schenectady-Troy MSA 10580	18.89	1,247	220,798	900	169,490	0	0	18	405,960	2,165	796,248	43.98
Limited Review:												
Buffalo-Niagara Falls MSA 15380	24.83	2,220	254,705	588	85,867	5	171	32	123,503	2,845	464,246	15.71
Glen Falls AA 24020	0.64	55	9,386	18	2,114	0	0	0	0	73	11,500	0.35
Kingston MSA 28740	2.91	197	36,623	129	14,572	7	542	1	2,069	334	53,806	1.64
New York-White Plains-Wayne AA 35644	10.80	442	144,504	792	127,580	0	0	4	26,347	1,238	298,431	6.17
Poughkeepsie-Newburgh-Middletown MSA 39100	5.31	334	75,305	258	34,038	11	1,386	6	9,533	609	120,262	6.96
Rochester AA 40380	6.09	399	83,217	269	48,384	11	1,598	19	50,897	698	184,096	3.58
Syracuse MSA 45060	12.03	834	91,265	529	102,831	3	340	13	62,710	1,379	257,146	10.73
Utica-Rome AA 46540	1.20	100	7,764	35	3,760	1	50	2	12,320	138	23,894	0.40
Non-MSA NY	17.29	1,410	155,565	539	68,906	20	1,620	12	34,892	1,981	260,983	10.48
CD loans with potential to benefit one or more AAs								2	4,693			

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Albany-Schenectady-Troy MSA 10580	429	16.34	2.78	2.33	13.35	12.59	53.66	51.98	30.21	33.10	1.26	2.11	1.76	1.13	1.23	
Limited Review:																
Buffalo-Niagara Falls MSA 15380	918	34.97	4.34	1.09	13.17	12.42	51.87	54.25	30.61	32.24	2.57	2.63	4.06	2.51	2.30	
Glen Falls AA 24020	20	0.76	0.00	0.00	10.09	5.00	59.90	60.00	30.01	35.00	0.86	0.00	0.00	0.99	0.90	
Kingston MSA 28740	44	1.68	0.00	0.00	8.34	11.36	76.90	79.55	14.76	9.09	0.80	0.00	0.00	0.98	0.50	
New York-White Plains-Wayne AA 35644	104	3.82	.45	.96	1.91	0.00	8.97	13.46	88.66	85.58	.21	0.00	0.00	.27	.21	
Poughkeepsie-Newburgh-Middletown MSA 39100	95	3.62	2.07	1.05	8.38	11.58	66.59	66.32	22.96	21.05	0.54	0.71	0.93	0.50	0.47	
Rochester AA 40380	194	7.39	3.69	3.09	10.69	13.92	51.40	52.58	34.21	30.41	0.48	0.42	0.64	0.51	0.41	
Syracuse MSA 45060	307	11.70	2.33	4.23	11.70	8.79	55.10	52.12	30.87	34.85	1.22	1.63	1.78	1.11	1.23	
Utica-Rome AA 46540	36	1.37	3.44	5.56	10.51	13.89	56.56	52.78	29.49	27.78	0.62	0.00	0.48	0.74	0.48	
Non-MSA NY	578	22.02	0.10	0.00	6.34	6.40	80.23	77.51	13.33	16.09	2.36	0.00	1.79	2.38	2.55	

* Based on 2010 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			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Albany-Schenectady-Troy MSA 10580	95	10.76	2.78	8.42	13.35	9.47	53.66	41.05	30.21	41.05	1.80	0.00	1.60	2.08	1.51	
Limited Review:																
Buffalo-Niagara Falls MSA 15380	191	21.63	4.34	1.57	13.17	15.71	51.87	48.17	30.61	34.55	4.75	2.86	3.50	3.50	8.47	
Glen Falls AA 24020	2	0.23	0.00	0.00	10.09	0.00	59.90	50.00	30.01	50.00	0.00	0.00	0.00	0.00	0.00	
Kingston MSA 28740	32	3.62	0.00	0.00	8.34	9.38	76.90	84.38	14.76	6.25	2.93	0.00	0.00	3.80	0.00	
New York-White Plains-Wayne AA 35644	33	3.60	.45	0.00	1.91	0.00	8.97	6.06	88.66	93.94	2.69	0.00	0.00	1.64	2.86	
Poughkeepsie-Newburgh-Middletown MSA 39100	37	4.19	2.07	2.70	8.38	0.00	66.59	64.86	22.96	32.43	2.46	12.50	0.00	2.07	4.03	
Rochester AA 40380	39	4.42	3.69	0.00	10.69	15.38	51.40	53.85	34.21	30.77	0.49	0.00	0.57	0.50	0.46	
Syracuse MSA 45060	202	22.88	2.33	0.50	11.70	5.94	55.10	61.88	30.87	31.68	4.42	0.00	1.55	4.52	5.59	
Utica-Rome AA 46540	41	4.64	3.44	0.00	10.51	2.44	56.56	51.22	29.49	46.34	2.54	0.00	0.00	1.90	5.17	
Non-MSA NY	244	27.63	0.10	0.41	6.34	6.97	80.23	83.61	13.33	9.02	2.67	0.00	2.72	2.81	1.58	

* Based on 2010 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			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Albany-Schenectady-Troy MSA 10580	722	21.99	2.78	1.94	13.35	5.54	53.66	47.92	30.21	44.60	1.44	2.13	1.06	1.29	1.67	
Limited Review:																
Buffalo-Niagara Falls MSA 15380	1,111	33.84	4.34	0.63	13.17	3.87	51.87	45.45	30.61	50.05	3.86	2.13	2.92	3.41	4.38	
Glen Falls AA 24020	33	1.01	0.00	0.00	10.09	0.00	59.90	48.48	30.01	51.52	1.23	0.00	0.00	0.75	2.30	
Kingston MSA 28740	119	3.62	0.00	0.00	8.34	9.24	76.90	79.83	14.76	10.92	1.87	0.00	2.00	2.11	0.98	
New York-White Plains-Wayne AA 35644	300	8.38	.45	0.00	1.91	1.67	8.97	3.33	88.66	95.00	.69	0.00	.39	.19	.73	
Poughkeepsie-Newburgh-Middletown MSA 39100	198	6.03	2.07	0.51	8.38	2.53	66.59	65.66	22.96	31.31	0.90	0.00	0.00	0.82	1.29	
Rochester AA 40380	162	4.93	3.69	0.62	10.69	8.64	51.40	40.74	34.21	50.00	0.50	0.00	0.49	0.45	0.55	
Syracuse MSA 45060	324	9.87	2.33	0.62	11.70	5.25	55.10	45.37	30.87	48.77	1.71	1.64	1.11	1.61	1.90	
Utica-Rome AA 46540	23	0.70	3.44	0.00	10.51	0.00	56.56	26.09	29.49	73.91	0.36	0.00	0.00	0.15	0.74	
Non-MSA NY	587	17.88	0.10	0.00	6.34	3.92	80.23	81.60	13.33	14.48	2.50	0.00	3.07	2.74	1.40	

* Based on 2010 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: NEW YORK					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
Full Review:																
Albany-Schenectady-Troy MSA 10580	1	7.69	18.98	0.00	14.82	0.00	46.89	0.00	19.32	100.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Buffalo-Niagara Falls MSA 15380	0	0.00	18.07	0.00	14.71	0.00	43.80	0.00	23.42	0.00	0.00	0.00	0.00	0.00	0.00	
Glen Falls AA 24020	0	0.00	0.00	0.00	29.78	0.00	27.73	0.00	42.49	0.00	0.00	0.00	0.00	0.00	0.00	
Kingston MSA 28740	2	15.38	0.00	0.00	30.39	0.00	63.99	0.00	5.62	100.00	11.76	0.00	0.00	0.00	40.00	
New York-White Plains-Wayne AA 35644	5	27.78	3.00	0.00	10.01	20.00	19.37	0.00	67.63	80.00	1.48	0.00	2.50	0.00	1.83	
Poughkeepsie-Newburgh-Middletown MSA 39100	4	30.77	15.63	0.00	20.85	0.00	59.37	100.00	4.16	0.00	14.81	0.00	0.00	26.67	0.00	
Rochester AA 40380	4	30.77	16.21	0.00	18.65	0.00	43.15	50.00	21.99	50.00	3.51	0.00	0.00	7.41	0.00	
Syracuse MSA 45060	1	7.69	26.31	0.00	23.07	0.00	34.40	100.00	16.22	0.00	0.00	0.00	0.00	0.00	0.00	
Utica-Rome AA 46540	0	0.00	26.85	0.00	27.54	0.00	30.15	0.00	15.45	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA NY	1	7.69	2.41	0.00	19.27	0.00	70.46	0.00	7.86	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 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												Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
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	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Albany-Schenectady-Troy MSA 10580	900	22.23	9.96	11.89	12.72	12.44	49.23	44.22	28.08	31.44	2.09	2.86	1.95	2.09	2.10					
Limited Review:																				
Buffalo-Niagara Falls MSA 15380	583	14.40	8.26	7.89	12.42	14.24	46.20	53.34	31.51	24.53	0.94	1.59	1.23	1.06	0.75					
Glen Falls AA 24020	18	0.44	0.00	0.00	15.81	11.11	51.09	33.33	33.10	55.56	0.27	0.00	0.00	0.19	0.56					
Kingston MSA 28740	129	3.19	0.00	0.00	10.70	17.83	74.98	74.42	14.32	7.75	1.20	0.00	3.80	1.17	0.68					
New York-White Plains-Wayne AA 34644	792	19.56	1.03	0.63	5.26	8.21	12.81	11.62	80.88	79.55	0.08	0.04	0.10	0.17	0.07					
Poughkeepsie-Newburgh-Middletown MSA 39100	258	6.37	7.60	5.04	10.86	6.98	61.92	63.95	19.61	24.03	0.55	0.69	0.41	0.56	0.64					
Rochester AA 40380	268	6.62	8.02	13.06	12.62	18.66	46.65	36.19	32.62	32.09	0.50	1.28	1.08	0.27	0.50					
Syracuse MSA 45060	529	13.06	11.18	13.04	11.88	6.99	49.67	47.83	27.28	32.14	1.42	2.12	1.00	1.34	1.58					
Utica-Rome AA 46540	35	0.86	10.53	11.43	13.10	11.43	50.87	14.29	25.49	62.86	0.29	0.00	0.27	0.09	0.71					
Non-MSA NY	537	13.26	0.83	1.49	9.07	11.92	77.26	76.72	12.77	9.87	0.98	1.96	1.54	1.04	0.62					

* Based on 2010 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: NEW YORK		Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
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:																					
Albany-Schenectady-Troy MSA 10580	0	0.00	1.34	0.00	13.68	0.00	59.16	0.00	25.82	0.00	0.00	0.00	0.00	0.00	0.00						
Limited Review:																					
Buffalo-Niagara Falls MSA 15380	5	8.62	1.96	0.00	4.82	20.00	59.80	0.00	32.91	80.00	2.67	0.00	0.00	0.00	8.33						
Glen Falls AA 24020	0	0.00	0.00	0.00	10.14	0.00	56.52	0.00	33.33	0.00	0.00	0.00	0.00	0.00	0.00						
Kingston MSA 28740	7	12.07	0.00	0.00	5.45	0.00	73.39	100.00	21.16	0.00	0.00	0.00	0.00	0.00	0.00						
New York-White Plains-Wayne AA 34644	0	0.00	0.77	0.00	3.31	0.00	12.77	0.00	83.15	0.00	0.00	0.00	0.00	0.00	0.00						
Poughkeepsie-Newburgh-Middletown MSA 39100	11	18.97	0.82	0.00	7.34	0.00	65.42	45.45	26.43	54.55	4.35	0.00	0.00	0.00	11.11						
Rochester AA 40380	11	18.97	1.40	0.00	6.08	0.00	64.84	54.55	27.68	45.45	1.09	0.00	0.00	0.90	2.50						
Syracuse MSA 45060	3	5.17	1.48	0.00	12.09	0.00	53.76	100.00	32.66	0.00	1.49	0.00	0.00	2.38	0.00						
Utica-Rome AA 46540	1	1.72	1.57	0.00	4.55	0.00	72.41	100.00	21.47	0.00	0.00	0.00	0.00	0.00	0.00						
Non-MSA NY	20	34.48	0.04	0.00	2.66	0.00	84.34	100.00	12.96	0.00	0.62	0.00	0.00	0.70	0.00						

* Based on 2010 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		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 **	% BANK Loans***	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****						
Full Review:																
Albany-Schenectady-Troy MSA 10580	429	16.34	19.23	9.56	18.71	31.00	23.17	22.61	38.88	36.83	1.33	1.46	1.62	1.05	1.28	
Limited Review:																
Buffalo-Niagara Falls MSA 15380	918	34.97	20.37	15.80	18.07	32.24	22.08	23.97	39.48	28.00	2.95	3.87	3.41	2.57	2.51	
Glen Falls AA 24020	20	0.76	17.32	0.00	18.14	25.00	23.62	20.00	40.93	55.00	0.92	0.00	1.37	0.59	0.97	
Kingston MSA 28740	44	1.68	19.23	4.55	18.20	20.45	23.74	36.36	38.83	38.64	0.84	1.14	1.02	0.52	0.93	
New York-White Plains-Wayne AA 34644	104	3.82	12.58	0.00	10.00	5.77	13.97	31.73	63.45	62.50	0.22	0.00	0.17	0.46	0.18	
Poughkeepsie-Newburgh-Middletown MSA 39100	95	3.62	19.14	3.16	18.04	31.58	24.40	42.11	38.41	23.16	0.58	0.38	0.71	0.76	0.34	
Rochester AA 40380	194	7.39	19.57	16.49	17.94	33.51	22.77	20.10	39.71	29.90	0.57	0.81	0.47	0.45	0.65	
Syracuse MSA 45060	307	11.70	20.27	16.01	18.30	23.53	21.84	24.51	39.58	35.95	1.33	2.21	1.06	1.25	1.28	
Utica-Rome AA 46540	36	1.37	19.49	11.11	17.60	38.89	22.45	22.22	40.46	27.78	0.67	0.57	1.29	0.41	0.35	
Non-MSA NY	578	22.02	18.77	7.79	18.89	27.68	22.93	23.53	39.42	41.00	2.58	3.96	3.27	2.04	2.38	

* Based on 2010 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. 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			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Albany-Schenectady-Troy MSA 10580	95	10.76	19.23	11.83	18.71	23.66	23.17	26.88	38.88	37.63	1.86	0.00	2.81	2.11	1.73	
Limited Review:																
Buffalo-Niagara Falls MSA 15380	191	21.63	20.37	13.04	18.07	22.83	22.08	21.20	39.48	42.93	4.84	1.55	2.47	6.48	7.87	
Glen Falls AA 24020	2	0.23	17.32	0.00	18.14	0.00	23.62	100.00	40.93	0.00	0.00	0.00	0.00	0.00	0.00	
Kingston MSA 28740	32	3.62	19.23	18.75	18.20	28.13	23.74	18.75	38.83	34.38	3.01	3.85	1.45	3.49	3.39	
New York-White Plains-Wayne AA 34644	33	3.60	12.58	6.06	10.00	6.06	13.97	21.21	63.45	66.67	2.89	8.33	6.67	3.61	2.38	
Poughkeepsie-Newburgh-Middletown MSA 39100	37	4.19	19.14	18.92	18.04	16.22	24.40	32.43	38.41	32.43	2.54	1.69	1.63	4.70	1.81	
Rochester AA 40380	39	4.42	19.57	8.11	17.94	21.62	22.77	13.51	39.71	56.76	0.45	0.26	0.38	0.14	0.92	
Syracuse MSA 45060	202	22.88	20.27	7.00	18.30	12.50	21.84	20.50	39.58	60.00	4.52	2.31	2.17	2.91	8.09	
Utica-Rome AA 46540	41	4.64	19.49	2.44	17.60	7.32	22.45	17.07	40.46	73.17	2.55	1.25	0.67	1.26	5.04	
Non-MSA NY	244	27.63	18.77	13.22	18.89	25.62	22.93	23.14	39.42	38.02	2.71	3.52	2.88	2.12	2.77	

* Based on 2010 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 1.7% of loans originated and purchased by bank. 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			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Albany-Schenectady-Troy MSA 10580	722	21.99	19.23	7.53	18.71	18.04	23.17	26.14	38.88	48.30	1.53	1.28	1.21	1.33	1.84	
Limited Review:																
Buffalo-Niagara Falls MSA 15380	1,111	33.84	20.37	7.99	18.07	19.19	22.08	29.38	39.48	43.43	4.28	8.41	3.96	3.93	4.21	
Glen Falls AA 24020	33	1.01	17.32	0.00	18.14	12.12	23.62	24.24	40.93	63.64	1.33	0.00	0.00	0.50	2.08	
Kingston MSA 28740	119	3.62	19.23	12.71	18.20	22.88	23.74	29.66	38.83	34.75	2.06	6.00	3.15	2.05	1.26	
New York-White Plains-Wayne AA 34644	300	8.38	12.58	0.34	10.00	7.05	13.97	16.11	63.45	76.51	0.77	0.00	0.65	1.08	0.74	
Poughkeepsie-Newburgh-Middletown MSA 39100	198	6.03	19.14	4.04	18.04	17.68	24.40	33.84	38.41	44.44	0.98	0.94	0.82	0.92	1.09	
Rochester AA 40380	162	4.93	19.57	4.46	17.94	24.84	22.77	22.93	39.71	47.77	0.52	0.31	0.82	0.25	0.57	
Syracuse MSA 45060	324	9.87	20.27	7.72	18.30	13.50	21.84	28.94	39.58	49.84	1.73	1.81	1.21	2.11	1.71	
Utica-Rome AA 46540	23	0.70	19.49	4.55	17.60	13.64	22.45	27.27	40.46	54.55	0.34	0.00	0.00	0.51	0.40	
Non-MSA NY	587	17.88	18.77	3.99	18.89	14.93	22.93	26.74	39.42	54.34	2.77	1.73	3.31	3.04	2.59	

* Based on 2010 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 2.2% of loans originated by bank. 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		Geography: NEW YORK			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Albany-Schenectady-Troy MSA 10580	900	22.18	66.79	47.11	59.67	16.33	24.00	2.09	3.32
Limited Review:									
Buffalo-Niagara Falls MSA 15380	588	14.49	64.68	56.63	67.35	15.99	16.67	0.94	1.40
Glen Falls AA 24020	18	0.44	69.37	61.11	72.22	16.67	11.11	0.27	0.27
Kingston MSA 28740	129	3.18	70.04	63.57	76.74	9.30	13.95	1.20	1.59
New York-White Plains-Wayne AA 34644	792	19.52	65.45	74.37	64.14	18.81	17.05	0.08	0.24
Poughkeepsie-Newburgh-Middletown MSA 39100	258	6.36	68.85	66.67	66.67	17.83	15.50	0.55	0.91
Rochester AA 40380	269	6.63	67.54	53.16	59.85	16.36	23.79	0.50	0.82
Syracuse MSA 45060	529	13.04	68.20	46.88	57.09	17.39	25.52	1.42	2.00
Utica-Rome AA 46540	35	0.86	68.73	48.57	71.43	14.29	14.29	0.29	0.26
Non-MSA NY	539	13.29	66.91	64.75	73.28	12.24	14.47	0.98	1.93

* Based on 2010 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 5.25% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NEW YORK			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Albany-Schenectady-Troy MSA 10580	0	0.00	97.79	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Buffalo-Niagara Falls MSA 15380	5	8.62	95.83	100.00	100.00	0.00	0.00	2.67	4.35
Glen Falls AA 24020	0	0.00	99.28	0.00	0.00	0.00	0.00	0.00	0.00
Kingston MSA 28740	7	12.07	97.19	0.00	71.43	28.57	0.00	0.00	0.00
New York-White Plains-Wayne AA 34644		0.00	95.89	0.00	0.00	0.00	0.00	0.00	0.00
Poughkeepsie-Newburgh-Middletown MSA 39100	11	18.97	96.52	18.18	72.73	9.09	18.18	4.35	0.00
Rochester AA 40380	11	18.97	96.49	90.91	54.55	36.36	9.09	1.09	1.55
Syracuse MSA 45060	3	5.17	96.50	100.00	66.67	33.33	0.00	1.49	2.00
Utica-Rome AA 46540	1	1.72	98.12	100.00	100.00	0.00	0.00	0.00	0.00
Non-MSA NY	20	34.48	97.58	90.00	70.00	30.00	0.00	0.62	0.78

* Based on 2010 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: NEW YORK									
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Albany-Schenectady-Troy MSA 10580	6	14,185	39	355	45	14,540	7.62	0	0
Limited Review:									
Buffalo-Niagara Falls MSA 15380	10	7,776	17	27,530	27	35,306	18.50	1	88
Glen Falls AA 24020	0	0	0	0	0	0	0.00	0	0
Kingston MSA 28740	1	200	2	10	3	210	0.11	0	0
New York-White Plains-Wayne AA 34644	13	12,215	6	65	19	12,280	6.43	0	0
Poughkeepsie-Newburgh-Middletown MSA 39100	13	1,883	0	0	13	1,883	0.99	0	0
Rochester AA 40380	36	7,462	2	5,628	38	13,090	6.86	0	0
Syracuse MSA 45060	11	23,838	13	34,578	24	58,417	30.60	0	0
Utica-Rome AA 46540	10	11,260	1	5,136	11	16,396	8.59	0	0
Non-MSA NY	15	13,921	8	11,882	23	25,803	13.52	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	4	12,448	1	507	5	12,955	6.78	1	1,992

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: NEW YORK Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closin gs	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:																	
Albany-Schenectady-Troy MSA 10580	43.98	41	17.52	12.20	12.20	53.66	21.95	1	0	0	0	0	1	7.34	16.25	50.39	25.85
Limited Review:																	
Buffalo-Niagara Falls MSA 15380	15.71	42	17.95	9.52	14.29	50.00	26.19	7	2	0	1	2	2	8.78	16.45	47.62	26.35
Glen Falls AA 24020	0.35	1	0.43	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	13.38	57.47	29.15
Kingston MSA 28740	1.64	10	4.27	0.00	10.00	80.00	10.00	0	0	0	0	0	0	0.00	11.46	75.10	13.44
New York-White Plains- Wayne AA 35644	6.17	30	12.82	0.00	13.33	13.33	73.33	2	4	0	1	- 2	- 1	2.49	7.15	15.77	74.59
Poughkeepsie-Newburgh- Middletown MSA 39100	6.96	17	7.26	11.76	5.88	76.47	5.88	0	1	0	0	- 1	0	7.18	11.97	62.07	18.75
Rochester AA 40380	3.57	14	5.98	14.29	28.57	35.71	21.43	0	1	0	0	- 1	0	9.01	13.17	48.18	29.00
Syracuse MSA 45060	10.73	28	11.97	10.71	28.57	39.29	21.43	0	1	0	0	- 1	0	8.20	15.32	49.06	27.42
Utica-Rome AA 46540	0.40	2	0.85	50.00	0.00	0.00	50.00	0	0	0	0	0	0	7.58	14.97	51.87	25.56
Non-MSA NY	10.48	49	20.94	4.08	14.29	73.47	8.16	0	0	0	0	0	0	0.52	9.72	76.72	12.23

Table 1. Lending Volume

LENDING VOLUME		Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Seattle-Bellevue MD 42644	47.83	2,511	780,534	1,665	419,208	10	1,888	44	207,845	4,230	1,409,475	64.52
Limited Review:												
Bellingham MSA 13380	3.42	182	45,176	114	23,298	6	800	0	0	302	69,274	2.58
Bremerton MSA 14740	2.51	151	31,854	67	12,175	3	180	1	6	222	44,215	1.32
Kennewick-Pasco-Richland AA 28420	1.76	99	24,844	42	13,766	15	4,451	0	0	156	43,061	0.95
Longview MSA 31020	0.83	50	7,580	23	5,997	0	0	0	0	73	13,577	0.70
Mount Vernon MSA 34580	1.07	64	12,977	30	9,770	1	150	0	0	95	22,897	0.64
Olympia MSA 36500	5.30	345	58,241	124	10,752	0	0	0	0	469	68,993	3.58
Tacoma MD 45104	16.07	947	195,784	469	89,013	0	0	5	54,262	1,421	339,059	16.14
Wenatchee-East Wenatchee AA 48300	1.05	51	11,511	23	3,814	19	3,766	0	0	93	19,091	0.61
Yakima MSA 49420	4.93	165	21,309	123	34,638	145	29,576	3	5,778	436	91,301	1.72
Non-MSA WA	15.22	819	155,541	251	31,352	275	54,380	1	1,500	1,346	242,773	7.24

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															
Geography: WASHINGTON															
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue MD 42644	713	51.74	0.49	0.42	15.58	21.74	55.45	48.95	28.48	28.89	0.46	0.54	0.62	0.48	0.33
Limited Review:															
Bellingham MSA 13380	49	3.56	0.00	0.00	8.83	6.12	71.28	67.35	19.90	26.53	0.29	0.00	0.00	0.33	0.31
Bremerton MSA 14740	37	2.69	1.75	0.00	9.31	27.03	69.62	48.65	19.32	24.32	0.25	0.00	0.23	0.25	0.32
Kennewick-Pasco-Richland AA 28420	34	2.47	2.07	0.00	5.39	2.94	58.38	64.71	34.16	32.35	0.28	0.00	0.00	0.43	0.17
Longview MSA 31020	14	1.02	2.18	0.00	10.31	0.00	66.32	64.29	21.20	35.71	0.42	0.00	0.00	0.47	0.47
Mount Vernon MSA 34580	11	0.80	0.00	0.00	9.11	18.18	71.16	72.73	19.73	9.09	0.06	0.00	0.00	0.08	0.00
Olympia MSA 36500	65	4.72	0.00	0.00	12.34	20.00	68.09	53.85	19.57	26.15	0.38	0.00	1.08	0.33	0.26
Tacoma MD 45104	233	16.91	0.50	0.86	10.96	18.45	63.09	57.94	25.46	22.75	0.49	1.52	0.64	0.43	0.56
Wenatchee-East Wenatchee AA 48300	21	1.52	0.00	0.00	15.78	14.29	58.76	66.67	25.47	19.05	0.43	0.00	0.00	0.72	0.00
Yakima MSA 49420	27	1.96	1.43	0.00	22.04	11.11	38.95	66.67	37.58	22.22	0.25	0.00	0.00	0.55	0.09
Non-MSA WA	174	12.63	0.00	0.00	8.38	12.64	73.97	70.69	17.65	16.67	0.80	0.00	1.33	0.93	0.26

* Based on 2010 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		Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Seattle-Bellevue MD 42644	97	37.31	0.49	1.03	15.58	16.49	55.45	57.73	28.48	24.74	1.76	0.00	1.58	1.73	1.93	
Limited Review:																
Bellingham MSA 13380	7	2.69	0.00	0.00	8.83	14.29	71.28	57.14	19.90	28.57	1.12	0.00	0.00	1.10	1.61	
Bremerton MSA 14740	6	2.31	1.75	0.00	9.31	16.67	69.62	83.33	19.32	0.00	0.87	0.00	2.38	0.88	0.00	
Kennewick-Pasco-Richland AA 28420	7	2.69	2.07	28.57	5.39	0.00	58.38	28.57	34.16	42.86	0.24	0.00	0.00	0.47	0.00	
Longview MSA 31020	2	0.77	2.18	0.00	10.31	50.00	66.32	50.00	21.20	0.00	0.00	0.00	0.00	0.00	0.00	
Mount Vernon MSA 34580	4	1.54	0.00	0.00	9.11	0.00	71.16	100.00	19.73	0.00	0.00	0.00	0.00	0.00	0.00	
Olympia MSA 36500	23	8.85	0.00	0.00	12.34	17.39	68.09	56.52	19.57	26.09	2.53	0.00	3.70	1.20	6.82	
Tacoma MD 45104	46	17.69	0.50	0.00	10.96	8.70	63.09	67.39	25.46	23.91	2.21	0.00	0.00	2.31	2.67	
Wenatchee-East Wenatchee AA 48300	1	0.38	0.00	0.00	15.78	0.00	58.76	0.00	25.47	100.00	0.60	0.00	0.00	0.00	1.82	
Yakima MSA 49420	15	5.77	1.43	0.00	22.04	26.67	38.95	40.00	37.58	33.33	3.45	0.00	5.88	3.85	2.26	
Non-MSA WA	52	20.00	0.00	0.00	8.38	7.69	73.97	82.69	17.65	9.62	2.27	0.00	0.00	2.76	1.25	

* Based on 2010 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												Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																				
Seattle-Bellevue MD 42644	1,679	45.17	0.49	0.77	15.58	14.23	55.45	54.68	28.48	30.32	0.53	0.36	0.65	0.51	0.53					
Limited Review:																				
Bellingham MSA 13380	125	3.36	0.00	0.00	8.83	8.80	71.28	60.00	19.90	31.20	0.49	0.00	0.45	0.46	0.60					
Bremerton MSA 14740	108	2.91	1.75	0.93	9.31	5.56	69.62	70.37	19.32	23.15	0.42	0.00	0.30	0.40	0.55					
Kennewick-Pasco-Richland AA 28420	57	1.53	2.07	0.00	5.39	7.02	58.38	59.65	34.16	33.33	0.46	0.00	0.00	0.75	0.25					
Longview MSA 31020	34	0.91	2.18	2.94	10.31	5.88	66.32	61.76	21.20	29.41	0.41	0.00	0.52	0.33	0.62					
Mount Vernon MSA 34580	49	1.32	0.00	0.00	9.11	4.08	71.16	67.35	19.73	28.57	0.38	0.00	0.85	0.36	0.34					
Olympia MSA 36500	257	6.91	0.00	0.00	12.34	16.34	68.09	62.26	19.57	21.40	0.88	0.00	1.20	0.80	0.99					
Tacoma MD 45104	667	17.94	0.50	0.30	10.96	5.40	63.09	63.42	25.46	30.88	0.92	0.00	0.74	0.89	1.05					
Wenatchee-East Wenatchee AA 48300	29	0.78	0.00	0.00	15.78	6.90	58.76	62.07	25.47	31.03	0.09	0.00	0.00	0.07	0.16					
Yakima MSA 49420	123	3.31	1.43	1.63	22.04	15.45	38.95	55.28	37.58	27.64	1.23	8.00	2.17	1.74	0.64					
Non-MSA WA	589	15.85	0.00	0.00	8.38	6.96	73.97	76.06	17.65	16.98	1.34	0.00	1.23	1.63	0.69					

* Based on 2010 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: WASHINGTON					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Seattle-Bellevue MD 42644	22	75.86	3.72	0.00	36.96	31.82	43.29	45.45	16.04	22.73	1.86	0.00	2.02	0.64	5.66	
Limited Review:																
Bellingham MSA 13380	1	3.45	0.00	0.00	27.18	100.00	62.25	0.00	10.58	0.00	0.00	0.00	0.00	0.00	0.00	
Bremerton MSA 14740	0	0.00	9.25	0.00	28.01	0.00	54.98	0.00	7.76	0.00	0.00	0.00	0.00	0.00	0.00	
Kennewick-Pasco-Richland AA 28420	1	3.45	16.56	100.00	11.23	0.00	55.59	0.00	16.62	0.00	0.00	0.00	0.00	0.00	0.00	
Longview MSA 31020	0	0.00	0.64	0.00	42.57	0.00	55.16	0.00	1.62	0.00	0.00	0.00	0.00	0.00	0.00	
Mount Vernon MSA 34580	0	0.00	0.00	0.00	13.16	0.00	84.67	0.00	2.16	0.00	0.00	0.00	0.00	0.00	0.00	
Olympia MSA 36500	0	0.00	0.00	0.00	31.69	0.00	66.41	0.00	1.90	0.00	0.00	0.00	0.00	0.00	0.00	
Tacoma MD 45104	1	3.45	8.47	0.00	29.99	100.00	52.41	0.00	9.13	0.00	1.47	0.00	6.67	0.00	0.00	
Wenatchee-East Wenatchee AA 48300	0	0.00	0.00	0.00	33.87	0.00	55.28	0.00	10.85	0.00	0.00	0.00	0.00	0.00	0.00	
Yakima MSA 49420	0	0.00	15.70	0.00	38.09	0.00	29.23	0.00	16.99	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA WA	4	13.79	0.00	0.00	18.94	0.00	75.34	100.00	5.72	0.00	5.88	0.00	0.00	11.11	0.00	

* Based on 2010 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.

...: Key (Included)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: WASHINGTON															
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011															
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue MD 42644	1,665	56.81	2.15	3.06	21.37	22.64	48.65	41.86	27.84	32.43	0.82	0.97	0.88	0.78	0.90
Limited Review:															
Bellingham MSA 13380	114	3.89	0.00	0.00	11.60	21.93	73.15	62.28	15.25	15.79	0.66	0.00	1.34	0.62	0.45
Bremerton MSA 14740	67	2.29	3.88	8.96	9.73	8.96	62.08	53.73	24.31	28.36	0.47	3.90	0.79	0.37	0.44
Kennewick-Pasco-Richland AA 28420	42	1.43	2.43	2.38	11.62	33.33	48.98	38.10	36.96	26.19	0.41	2.50	0.87	0.12	0.54
Longview MSA 31020	23	0.78	1.60	0.00	19.90	21.74	62.77	73.91	15.73	4.35	0.75	0.00	0.52	1.07	0.00
Mount Vernon MSA 34580	30	1.02	0.00	0.00	15.02	10.00	68.86	70.00	16.12	20.00	0.36	0.00	0.45	0.38	0.31
Olympia MSA 36500	124	4.23	0.00	0.00	19.87	21.77	64.73	67.74	15.40	10.48	0.55	0.00	0.42	0.69	0.40
Tacoma MD 45104	469	16.00	1.60	0.85	18.88	23.88	56.75	54.58	22.77	20.68	1.07	0.00	1.72	1.24	0.57
Wenatchee-East Wenatchee AA 48300	23	0.78	0.00	0.00	24.64	34.78	58.23	34.78	17.13	30.43	0.34	0.00	0.66	0.13	0.79
Yakima MSA 49420	123	4.20	8.36	8.94	21.82	12.20	36.97	59.35	32.86	19.51	1.37	0.94	0.97	2.40	0.78
Non-MSA WA	251	8.56	0.00	0.00	10.64	15.94	71.07	70.52	18.28	13.55	1.11	0.00	2.77	1.17	0.78

* Based on 2010 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: WASHINGTON							Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011									
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
Seattle-Bellevue MD 42644	10	2.11	0.92	0.00	16.54	0.00	59.03	100.00	23.51	0.00	1.24	0.00	0.00	1.97	0.00	
Limited Review:																
Bellingham MSA 13380	6	1.27	0.00	0.00	5.71	0.00	88.05	100.00	6.23	0.00	0.65	0.00	0.00	0.74	0.00	
Bremerton MSA 14740	3	0.63	2.22	0.00	5.00	0.00	66.94	100.00	25.83	0.00	9.09	0.00	0.00	16.67	0.00	
Kennewick-Pasco-Richland AA 28420	15	3.16	0.84	0.00	6.08	6.67	67.40	80.00	25.68	13.33	8.75	0.00	0.00	10.34	5.00	
Longview MSA 31020	0	0.00	2.33	0.00	15.18	0.00	59.53	0.00	22.96	0.00	0.00	0.00	0.00	0.00	0.00	
Mount Vernon MSA 34580	1	0.21	0.00	0.00	7.40	0.00	62.66	100.00	29.93	0.00	0.00	0.00	0.00	0.00	0.00	
Olympia MSA 36500	0	0.00	0.00	0.00	17.87	0.00	65.31	0.00	16.82	0.00	0.00	0.00	0.00	0.00	0.00	
Tacoma MD 45104	0	0.00	0.89	0.00	12.29	0.00	62.38	0.00	24.44	0.00	0.00	0.00	0.00	0.00	0.00	
Wenatchee-East Wenatchee AA 48300	19	4.01	0.00	0.00	9.35	5.26	63.82	84.21	26.83	10.53	4.76	0.00	0.00	7.02	3.45	
Yakima MSA 49420	145	30.59	1.18	0.00	10.25	8.97	67.86	73.10	20.72	17.93	17.33	0.00	26.32	17.54	14.29	
Non-MSA WA	275	58.02	0.00	0.00	10.84	22.55	76.77	73.09	12.39	4.36	14.31	0.00	24.32	14.16	6.12	

* Based on 2010 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		Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 **	% BANK Loans****	% Families ***	% BANK Loans***	% Families***	% BANK Loans****						
Full Review:																
Seattle-Bellevue MD 42644	713	51.74	18.50	10.67	18.70	27.67	24.54	18.96	38.26	42.70	0.50	0.91	0.65	0.30	0.46	
Limited Review:																
Bellingham MSA 13380	49	3.56	18.16	8.16	18.66	14.29	23.94	14.29	39.24	63.27	0.36	0.00	0.67	0.13	0.42	
Bremerton MSA 14740	37	2.69	17.45	10.81	19.02	24.32	24.52	35.14	39.02	29.73	0.28	0.54	0.28	0.26	0.26	
Kennewick-Pasco-Richland AA 28420	34	2.47	17.53	11.76	17.99	14.71	22.00	41.18	42.48	32.35	0.32	0.65	0.12	0.64	0.15	
Longview MSA 31020	14	1.02	20.36	0.00	17.47	14.29	23.64	7.14	38.53	78.57	0.45	0.00	0.59	0.00	0.74	
Mount Vernon MSA 34580	11	0.80	18.11	0.00	18.93	9.09	23.36	18.18	39.60	72.73	0.07	0.00	0.30	0.00	0.00	
Olympia MSA 36500	65	4.72	17.26	6.25	18.90	20.31	25.85	25.00	37.98	48.44	0.42	0.00	0.24	0.29	0.85	
Tacoma MD 45104	233	16.91	18.66	6.87	18.89	30.90	23.23	27.47	39.22	34.76	0.55	0.60	0.50	0.51	0.63	
Wenatchee-East Wenatchee AA 48300	21	1.52	19.23	0.00	19.25	19.05	20.52	9.52	41.01	71.43	0.50	0.00	0.00	0.00	1.02	
Yakima MSA 49420	27	1.96	20.45	3.70	18.68	25.93	20.51	33.33	40.36	37.04	0.27	0.00	0.19	0.31	0.36	
Non-MSA WA	174	12.63	18.55	4.02	18.38	17.24	23.63	25.29	39.44	53.45	0.90	0.36	0.65	0.53	1.36	

* Based on 2010 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 0.1% of loans originated and purchased by bank. 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			Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total **	% Families***	% BANK Loans****	% Families ***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall I	Low	Mod	Mid	Upp	
Full Review:																
Seattle-Bellevue MD 42644	97	37.31	18.50	12.50	18.70	9.38	24.54	25.00	38.26	53.13	1.83	3.90	0.70	1.81	2.03	
Limited Review:																
Bellingham MSA 13380	7	2.69	18.16	0.00	18.66	14.29	23.94	14.29	39.24	71.43	1.21	0.00	0.00	1.41	2.06	
Bremerton MSA 14740	6	2.31	17.45	0.00	19.02	20.00	24.52	60.00	39.02	20.00	0.90	0.00	0.00	2.86	0.00	
Kennewick-Pasco-Richland AA 28420	7	2.69	17.53	28.57	17.99	57.14	22.00	14.29	42.48	0.00	0.24	4.00	0.00	0.00	0.00	
Longview MSA 31020	2	0.77	20.36	0.00	17.47	0.00	23.64	0.00	38.53	100.00	0.00	0.00	0.00	0.00	0.00	
Mount Vernon MSA 34580	4	1.54	18.11	0.00	18.93	25.00	23.36	0.00	39.60	75.00	0.00	0.00	0.00	0.00	0.00	
Olympia MSA 36500	23	8.85	17.26	8.70	18.90	17.39	25.85	21.74	37.98	52.17	2.64	0.00	2.86	1.69	3.57	
Tacoma MD 45104	46	17.69	18.66	8.89	18.89	26.67	23.23	28.89	39.22	35.56	2.22	0.00	2.10	2.91	2.15	
Wenatchee-East Wenatchee AA 48300	1	0.38	19.23	0.00	19.25	0.00	20.52	0.00	41.01	100.00	0.63	0.00	0.00	0.00	1.25	
Yakima MSA 49420	15	5.77	20.45	20.00	18.68	20.00	20.51	26.67	40.36	33.33	3.54	14.29	5.26	1.64	2.33	
Non-MSA WA	52	20.00	18.55	5.88	18.38	15.69	23.63	29.41	39.44	49.02	2.33	0.00	1.80	4.24	1.76	

* Based on 2010 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 1.5% of loans originated and purchased by bank. 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			Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Seattle-Bellevue MD 42644	1,679	45.17	18.50	9.85	18.70	21.01	24.54	25.91	38.26	43.22	0.63	1.27	0.71	0.56	0.58	
Limited Review:																
Bellingham MSA 13380	125	3.36	18.16	4.00	18.66	12.80	23.94	22.40	39.24	60.80	0.64	0.32	0.53	0.54	0.76	
Bremerton MSA 14740	108	2.91	17.45	6.60	19.02	13.21	24.52	26.42	39.02	53.77	0.56	0.60	0.65	0.40	0.62	
Kennewick-Pasco-Richland AA 28420	57	1.53	17.53	13.73	17.99	31.37	22.00	23.53	42.48	31.37	0.42	1.62	0.69	0.28	0.33	
Longview MSA 31020	34	0.91	20.36	5.88	17.47	11.76	23.64	23.53	38.53	58.82	0.51	0.78	0.27	0.64	0.47	
Mount Vernon MSA 34580	49	1.32	18.11	2.04	18.93	16.33	23.36	22.45	39.60	59.18	0.51	0.83	0.43	0.24	0.64	
Olympia MSA 36500	257	6.91	17.26	6.32	18.90	25.30	25.85	32.02	37.98	36.36	1.19	0.79	1.33	1.56	0.95	
Tacoma MD 45104	667	17.94	18.66	8.56	18.89	19.57	23.23	28.59	39.22	43.27	1.21	1.82	1.31	1.48	0.97	
Wenatchee-East Wenatchee AA 48300	29	0.78	19.23	3.45	19.25	10.34	20.52	13.79	41.01	72.41	0.11	0.00	0.43	0.00	0.09	
Yakima MSA 49420	123	3.31	20.45	7.63	18.68	22.03	20.51	22.88	40.36	47.46	1.44	3.40	2.20	1.20	1.22	
Non-MSA WA	589	15.85	18.55	6.35	18.38	17.50	23.63	26.76	39.44	49.40	1.70	4.20	1.98	1.75	1.45	

* Based on 2010 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 1.1% of loans originated and purchased by bank. 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			Geography: WASHINGTON		Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Seattle-Bellevue MD 42644	1,665	56.81	68.13	48.23	50.45	16.76	32.79	0.82	0.85
Limited Review:									
Bellingham MSA 13380	114	3.89	71.93	48.25	53.51	22.81	23.68	0.66	0.66
Bremerton MSA 14740	67	2.29	72.40	50.75	58.21	16.42	25.37	0.47	0.30
Kennewick-Pasco-Richland AA 28420	42	1.43	69.83	54.76	40.48	19.05	40.48	0.41	0.87
Longview MSA 31020	23	0.78	70.97	39.13	39.13	30.43	30.43	0.75	0.64
Mount Vernon MSA 34580	30	1.02	71.10	53.33	50.00	10.00	40.00	0.36	0.29
Olympia MSA 36500	124	4.23	70.43	67.74	83.87	8.87	7.26	0.55	0.72
Tacoma MD 45104	469	16.00	72.08	53.73	58.85	17.27	23.88	1.07	0.99
Wenatchee-East Wenatchee AA 48300	23	0.78	71.91	52.17	60.87	17.39	21.74	0.34	0.42
Yakima MSA 49420	123	4.20	69.74	49.59	44.72	17.07	38.21	1.37	1.54
Non-MSA WA	251	8.56	72.86	64.94	72.51	15.14	12.35	1.11	1.59

* Based on 2010 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 10.88% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Seattle-Bellevue MD 42644	10	2.11	96.15	100.00	50.00	20.00	30.00	1.24	2.00
Limited Review:									
Bellingham MSA 13380	6	1.27	96.02	100.00	16.67	83.33	0.00	0.65	1.20
Bremerton MSA 14740	3	0.63	97.92	100.00	100.00	0.00	0.00	9.09	11.11
Kennewick-Pasco-Richland AA 28420	15	3.16	93.75	66.67	20.00	20.00	60.00	8.75	12.50
Longview MSA 31020	0	0.00	96.50	0.00	0.00	0.00	0.00	0.00	0.00
Mount Vernon MSA 34580	1	0.21	94.08	0.00	0.00	100.00	0.00	0.00	0.00
Olympia MSA 36500	0	0.00	96.06	0.00	0.00	0.00	0.00	0.00	0.00
Tacoma MD 45104	0	0.00	96.05	0.00	0.00	0.00	0.00	0.00	0.00
Wenatchee-East Wenatchee AA 48300	19	4.01	95.12	84.21	31.58	36.84	31.58	4.76	6.25
Yakima MSA 49420	145	30.59	91.60	84.83	33.79	37.24	28.97	17.33	21.62
Non-MSA WA	275	58.02	96.54	80.00	36.36	34.55	29.09	14.31	15.13

* Based on 2010 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 0.84% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: WASHINGTON									
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Seattle-Bellevue MSA 42644	46	24,374	64	13,981	110	38,355	47.26	0	0
Limited Review:									
Bellingham MSA 13380	3	120	1	1,000	4	1,120	1.38	0	0
Bremerton MSA 14740	10	145	0	0	10	145	.18	0	0
Kennewick-Pasco- Richland AA 28420	0	0	0	0	0	0	0.00	0	0
Longview MSA 31020	1	1,230	0	0	1	1,230	1.52	0	0
Mount Vernon MSA 34580	1	68	0	0	1	68	.08	0	0
Olympia MSA 36500	0	0	1	5	1	5	0.01	0	0
Tacoma MD 45104	5	4,985	26	293	31	5,277	6.50	0	0
Wenatchee-East Wenatchee AA 48300	0	0	0	0	0	0	0.00	0	0
Yakima MSA 49420	2	6,013	4	17,363	6	23,375	28.80	0	0
Non-MSA WA	2	74	5	8,426	7	8,500	10.47	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	1	93	1	2,983	2	3,077	3.80	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: WASHINGTON Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# 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:																	
Seattle-Bellevue MD 42644	64.52	84	51.85	5.95	27.38	45.24	21.43	14	2	0	0	6	6	1.93	21.89	52.39	23.79
Limited Review:																	
Bellingham MSA 13380	2.59	6	3.70	0.00	0.00	83.33	16.67	0	1	0	0	- 1	0	0.00	13.44	70.37	16.19
Bremerton MSA 14740	1.32	5	3.09	0.00	20.00	60.00	20.00	0	0	0	0	0	0	3.15	16.39	63.80	16.66
Kennewick-Pasco- Richland AA 28420	0.95	3	1.85	0.00	66.67	33.33	0.00	0	0	0	0	0	0	5.15	6.88	59.25	28.72
Longview MSA 31020	0.70	1	0.62	0.00	0.00	100.0 0	0.00	0	0	0	0	0	0	4.85	16.59	61.75	16.81
Mount Vernon MSA 34580	0.65	4	2.47	0.00	50.00	50.00	0.00	1	0	0	1	0	0	0.00	9.71	74.25	16.04
Olympia MSA 36500	3.58	9	5.56	0.00	11.11	77.78	11.11	0	0	0	0	0	0	0.00	15.50	68.02	16.48
Tacoma MD 45104	16.14	28	17.28	3.57	7.14	75.00	14.29	0	0	0	0	0	0	2.73	18.13	58.48	20.44
Wenatchee-East Wenatchee AA 48300	0.61	1	0.62	0.00	100.0 0	0.00	0.00	0	0	0	0	0	0	0.00	22.29	56.00	21.71
Yakima MSA 49420	1.72	5	3.09	20.00	20.00	40.00	20.00	0	0	0	0	0	0	3.68	29.57	38.98	27.77
Non-MSA WA	7.24	16	9.88	0.00	31.25	56.25	12.50	0	0	0	0	0	0	0.00	12.81	71.67	15.52

Table 1. Lending Volume

LENDING VOLUME												
Geography: MULTISTATE Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Cincinnati AA 17140	100.00	763	110,036	576	107,727	0	0	4	13,229	1,343	230,992	100.00
Portland AA 38900	100.00	2,154	513,347	1,404	309,187	52	10,546	13	48,404	3,623	881,484	100.00

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: MULTISTATE					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp									
Full Review:																								
Cincinnati AA 17140	278	100.00	2.38	2.88	14.70	12.59	51.43	55.04	31.49	29.50	0.26	0.26	0.28	0.25	0.27									
Portland AA 38900	804	100.00	0.73	1.74	15.70	27.74	54.45	43.91	29.12	26.62	0.99	2.23	2.00	0.83	0.66									

* Based on 2010 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		Geography: MULTISTATE				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:															
Cincinnati AA 17140	137	100.00	2.38	5.11	14.70	13.14	51.43	50.36	31.49	31.39	3.93	3.23	3.72	3.39	4.84
Portland AA 38900	89	100.00	0.73	0.00	15.70	16.85	54.45	51.69	29.12	31.46	2.18	0.00	3.10	2.12	1.91

* Based on 2010 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 Geography: MULTISTATE Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:															
Cincinnati AA 17140	346	100.00	2.38	1.73	14.70	8.09	51.43	45.66	31.49	44.51	0.21	0.42	0.20	0.21	0.22
Portland AA 38900	1,257	100.00	0.73	0.48	15.70	8.83	54.45	51.63	29.12	39.06	0.54	0.41	0.39	0.54	0.58

* Based on 2010 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: MULTISTATE				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:															
Cincinnati AA 17140	2	100.00	17.48	0.00	22.32	0.00	43.96	100.00	16.23	0.00	1.68	0.00	0.00	3.85	0.00
Portland AA 38900	4	100.00	3.47	0.00	35.11	25.00	43.00	25.00	18.42	50.00	0.45	0.00	1.00	0.00	0.00

* Based on 2010 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 Geography: MULTISTATE Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011															
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati AA 17140	573	100.00	4.61	6.46	14.99	11.34	47.59	41.36	32.15	40.84	0.48	0.89	0.25	0.46	0.57
Portland AA 38900	1,404	100.00	3.94	6.62	19.63	19.66	46.75	42.09	29.68	31.62	0.79	1.82	0.96	0.77	0.73

* Based on 2010 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: MULTISTATE Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011															
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati AA 17140	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Portland AA 38900	52	100.00	1.74	0.00	10.56	1.92	61.95	63.46	25.75	34.62	3.78	0.00	0.00	3.42	7.50

* Based on 2010 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															Geography: MULTISTATE					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Cincinnati AA 17140	278	100.00	18.81	20.14	18.19	35.61	22.97	16.91	40.03	27.34	0.30	0.42	0.38	0.13	0.29									
Portland AA 38900	804	100.00	18.28	7.98	19.13	36.03	23.50	20.57	39.08	35.41	1.10	1.16	1.87	0.77	0.77									

* Based on 2010 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. 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		Geography: MULTISTATE				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****					
Full Review:															
Cincinnati AA 17140	137	100.00	18.81	6.62	18.19	14.71	22.97	26.47	40.03	52.21	4.02	2.01	2.57	4.58	5.34
Portland AA 38900	89	100.00	18.28	12.36	19.13	19.10	23.50	33.71	39.08	34.83	2.32	0.82	3.08	2.63	2.03

* Based on 2010 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 0.7% of loans originated and purchased by bank. 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 Geography: MULTISTATE Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati AA 17140	346	100.00	18.81	9.71	18.19	20.59	22.97	22.35	40.03	47.35	0.24	0.34	0.32	0.19	0.24
Portland AA 38900	1,257	100.00	18.28	7.23	19.13	19.58	23.50	24.45	39.08	48.74	0.63	0.80	0.83	0.59	0.57

* Based on 2010 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 1.7% of loans originated and purchased by bank. 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		Geography: MULTISTATE		Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Cincinnati AA 17140	576	100.00	65.59	52.43	57.12	20.83	22.05	0.48	0.54
Portland AA 38900	1,404	100.00	66.71	48.43	54.49	17.17	28.35	0.79	0.67

* Based on 2010 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 9.20% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATE			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Cincinnati AA 17140	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Portland AA 38900	52	100.00	96.18	73.08	28.85	44.23	26.92	3.78	3.96

* Based on 2010 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: MULTISTATE			Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cincinnati AA 17140	42	7,830	18	3,205	60	11,035	100.00	2	170
Portland AA 38900	46	38,601	27	7,783	73	46,384	100.00	1	476

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MULTISTATE Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																		
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																		
Cincinnati AA 17140	100.00	30	100.00	3.33	16.67	56.67	23.33	0	0	0	0	0	0	0	6.80	18.14	47.69	27.27
Portland AA 38900	100.00	53	100.00	9.43	22.64	47.17	20.75	13	0	0	3	7	3	1.62	21.40	52.47	24.51	

Table 1. Lending Volume

LENDING VOLUME												
Geography: ALASKA												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Anchorage 11260 MSA	56.05	241	55,872	237	78,661	0	0	13	330,631	491	465,164	68.18
Limited Review:												
Fairbanks 21820 MSA	14.50	65	11,120	58	21,174	0	0	4	2,060	127	34,354	12.42
Non-MSA AK	29.45	176	32,096	82	15,329	0	0	0	0	258	47,425	19.40

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp	
Full Review:																
Anchorage MSA 11260	79	51.30	0.40	0.00	14.34	13.92	56.72	49.37	28.55	36.71	0.25	0.00	0.39	0.18	0.36	
Limited Review:																
Fairbanks MSA 21820	21	13.64	0.00	0.00	3.01	4.76	68.32	57.14	28.67	38.10	0.45	0.00	0.00	0.45	0.49	
Non-MSA AK	54	35.06	0.00	0.00	0.23	0.00	74.49	59.26	25.28	40.74	1.27	0.00	0.00	0.85	2.18	

* Based on 2010 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		Geography: ALASKA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Anchorage MSA11260	21	55.26	0.40	0.00	14.34	9.52	56.72	52.38	28.55	38.10	1.39	0.00	0.00	1.40	1.91	
Limited Review:																
Fairbanks MSA 21820	5	13.16	0.00	0.00	3.01	0.00	68.32	60.00	28.67	40.00	1.33	0.00	0.00	1.82	0.00	
Non-MSA AK	12	31.58	0.00	0.00	0.23	0.00	74.49	58.33	25.28	41.67	2.40	0.00	0.00	0.76	8.33	

* Based on 2010 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			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Anchorage MSA 11260	141	48.62	0.40	0.71	14.34	10.64	56.72	58.87	28.55	29.79	0.50	0.00	0.78	0.55	0.38	
Limited Review:																
Fairbanks MSA 21820	39	13.45	0.00	0.00	3.01	2.56	68.32	74.36	28.67	23.08	0.60	0.00	0.00	0.64	0.57	
Non-MSA AK	110	37.93	0.00	0.00	0.23	0.00	74.49	61.82	25.28	38.18	1.18	0.00	0.00	0.97	1.72	

* Based on 2010 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: ALASKA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
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	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Anchorage MSA 11260	237	62.86	1.62	1.69	24.94	29.96	50.22	52.32	23.23	16.03	0.90	3.30	1.10	1.01	0.62						
Limited Review:																					
Fairbanks MSA 21820	58	15.38	0.00	0.00	9.12	1.72	67.27	86.21	23.62	12.07	0.99	0.00	0.00	1.43	0.35						
Non-MSA AK	82	21.75	0.00	0.00	0.11	0.00	74.58	73.17	25.31	26.83	0.64	0.00	0.00	0.76	1.08						

* Based on 2010 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 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ALASKA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Anchorage MSA 11260	79	51.30	19.69	7.59	17.76	21.52	24.19	26.58	38.36	44.30	0.28	0.22	0.23	0.29	0.33	
Limited Review:																
Fairbanks MSA 21820	21	13.64	18.92	9.52	18.79	33.33	22.90	28.57	39.39	28.57	0.50	3.13	0.60	0.18	0.44	
Non-MSA AK	54	35.06	17.12	7.41	15.89	12.96	22.04	35.19	44.95	44.44	1.40	3.08	0.98	1.36	1.47	

* Based on 2010 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. 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		Geography: ALASKA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Anchorage MSA 11260	21	55.26	19.69	0.00	17.76	19.05	24.19	28.57	38.36	52.38	1.93	0.00	2.04	0.00	3.63	
Limited Review:																
Fairbanks MSA 21820	5	13.16	18.92	0.00	18.79	40.00	22.90	40.00	39.39	20.00	1.42	0.00	5.26	0.00	1.54	
Non-MSA AK	12	31.58	17.12	8.33	15.89	33.33	22.04	16.67	44.95	41.67	2.80	0.00	0.00	3.64	3.13	

* Based on 2010 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. 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												Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp			
Full Review:																				
Anchorage MSA 11260	141	48.62	19.69	3.60	17.76	18.71	24.19	33.09	38.36	44.60	0.65	0.23	0.68	0.72	0.63					
Limited Review:																				
Fairbanks MSA 21820	39	13.45	18.92	7.69	18.79	25.64	22.90	23.08	39.39	43.59	0.79	4.48	0.55	0.80	0.47					
Non-MSA AK	110	37.93	17.12	4.59	15.89	22.94	22.04	31.19	44.95	41.28	1.41	0.98	0.88	1.90	1.34					

* Based on 2010 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 1.0% of loans originated and purchased by bank. 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		Geography: ALASKA			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Anchorage MSA 11260	237	62.86	65.95	37.97	37.13	18.14	44.73	0.90	0.66
Limited Review:									
Fairbanks MSA 21820	58	15.38	66.31	20.69	25.86	29.31	44.83	0.99	0.00
Non-MSA AK	82	21.75	63.53	47.56	59.76	18.29	21.95	0.64	0.44

* Based on 2010 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 7.16% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: ALASKA				Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Anchorage 11260 MSA	1	2,637	0	0	1	2,637	18.87	0	0
Limited Review:									
Fairbanks 21820 MSA	0	0	1	9,693	1	9,693	69.35	0	0
Non-MSA AK	0	0	0	0	0	0	0.00	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	2	1,646	0	0	2	1,646	11.78	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
Geography: ALASKA																		
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																		
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# 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:																		
Anchorage MSA 11260	68.20	6	35.29	0.00	33.33	50.00	16.67	0	0	0	0	0	0	0	1.07	23.00	53.53	22.40
Limited Review:																		
Fairbanks MSA 21820	12.39	4	23.53	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	20.61	57.30	22.09	
Non-MSA AK	19.41	7	41.18	0.00	0.00	71.43	28.57	0	0	0	0	0	0	0.00	0.21	71.93	27.86	

Table 1. Lending Volume

LENDING VOLUME												
Geography: COLORADO												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Denver AA 19740	75.97	1,587	322,788	1,347	328,531	0	0	16	90,228	2,950	741,547	85.42
Limited Review:												
Boulder MSA 14500	3.97	108	78,590	45	9,533	0	0	1	9,581	154	97,704	3.08
Colorado Springs AA 17820	10.64	326	76,791	86	8,100	0	0	1	1,415	413	86,306	3.73
Fort Collins-Loveland MSA 22660	5.69	155	67,885	66	9,124	0	0	0	0	221	77,009	6.11
Greeley MSA 24540	2.24	49	8,513	33	7,650	3	70	2	1,600	87	17,833	0.32
Non-MSA CO	1.49	30	3,473	8	1,116	20	2,454	0	0	58	7,043	1.35

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: COLORADO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Denver AA 19740	724	72.76	1.94	5.39	22.29	25.97	42.16	35.50	33.62	33.15	0.50	0.85	0.76	0.44	0.42	
Limited Review:																
Boulder MSA 14500	45	4.52	0.27	0.00	19.36	8.89	44.99	44.44	35.39	46.67	0.22	0.00	0.20	0.31	0.11	
Colorado Springs AA 17820	155	15.58	0.12	0.00	19.55	24.52	49.48	47.74	30.85	27.74	0.40	0.00	0.61	0.39	0.32	
Fort Collins-Loveland MSA 22660	37	3.72	1.28	0.00	13.61	18.92	62.79	45.95	22.32	35.14	0.18	0.00	0.00	0.22	0.19	
Greeley MSA 24540	19	1.91	0.70	0.00	14.59	21.05	53.62	42.11	31.09	36.84	0.07	0.00	0.19	0.11	0.00	
Non-MSA CO	15	1.51	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.78	0.00	0.00	0.78	0.00	

* Based on 2010 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		Geography: COLORADO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Denver AA 19740	91	70.54	1.94	2.20	22.29	36.26	42.16	36.26	33.62	25.27	0.67	0.00	1.85	0.51	0.42	
Limited Review:																
Boulder MSA 14500	8	6.20	0.27	0.00	19.36	25.00	44.99	62.50	35.39	12.50	1.03	0.00	2.08	1.46	0.00	
Colorado Springs AA 17820	15	11.63	0.12	0.00	19.55	20.00	49.48	53.33	30.85	26.67	0.98	0.00	0.77	1.09	0.91	
Fort Collins-Loveland MSA 22660	11	8.53	1.28	0.00	13.61	0.00	62.79	90.91	22.32	9.09	1.22	0.00	0.00	2.02	0.00	
Greeley MSA 24540	3	2.33	0.70	0.00	14.59	33.33	53.62	66.67	31.09	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA CO	1	0.78	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.96	0.00	0.00	1.96	0.00	

* Based on 2010 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			Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Denver AA 19740	756	68.35	1.94	2.78	22.29	11.51	42.16	32.14	33.62	53.57	0.26	0.58	0.25	0.25	0.26	
Limited Review:																
Boulder MSA 14500	54	4.88	0.27	0.00	19.36	20.37	44.99	29.63	35.39	50.00	0.08	0.00	0.10	0.04	0.12	
Colorado Springs AA 17820	152	13.74	0.12	0.00	19.55	9.87	49.48	48.68	30.85	41.45	0.20	0.00	0.19	0.22	0.18	
Fort Collins-Loveland MSA 22660	103	9.31	1.28	0.00	13.61	15.53	62.79	51.46	22.32	33.01	0.25	0.00	0.15	0.23	0.32	
Greeley MSA 24540	27	2.44	0.70	0.00	14.59	0.00	53.62	48.15	31.09	51.85	0.11	0.00	0.00	0.09	0.13	
Non-MSA CO	14	1.27	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.67	0.00	0.00	0.67	0.00	

* Based on 2010 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: COLORADO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid
Full Review:																
Denver AA 19740	2	18.18	8.56	50.00	40.77	50.00	41.87	0.00	8.80	0.00	0.50	0.00	1.32	0.00	0.00	
Limited Review:																
Boulder MSA 14500	1	9.09	5.73	0.00	38.53	100.00	42.03	0.00	13.71	0.00	3.45	0.00	4.76	0.00	0.00	
Colorado Springs AA 17820	4	36.36	0.76	0.00	43.58	25.00	44.09	50.00	11.57	25.00	3.33	0.00	6.25	0.00	0.00	
Fort Collins-Loveland MSA 22660	4	36.36	3.99	0.00	39.68	25.00	46.38	25.00	9.95	50.00	6.67	0.00	0.00	14.29	0.00	
Greeley MSA 24540	0	0.00	9.66	0.00	49.21	0.00	27.61	0.00	13.52	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA CO	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 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		Geography: COLORADO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
Full Review:																
Denver AA 19740	1,325	84.77	3.31	5.21	20.97	30.87	36.81	28.45	37.91	35.47	0.56	1.56	0.85	0.46	0.44	
Limited Review:																
Boulder MSA 14500	45	2.88	1.04	0.00	27.10	48.89	39.93	24.44	31.92	26.67	0.11	0.00	0.31	0.06	0.03	
Colorado Springs AA 17820	86	5.50	3.72	0.00	20.30	52.33	41.82	33.72	34.16	13.95	0.18	0.00	0.50	0.18	0.07	
Fort Collins-Loveland MSA 22660	66	4.22	0.88	3.03	20.30	31.82	51.81	45.45	27.00	19.70	0.17	1.89	0.38	0.03	0.21	
Greeley MSA 24540	33	2.11	2.89	6.06	10.48	0.00	48.50	69.70	38.07	24.24	0.08	0.00	0.00	0.12	0.07	
Non-MSA CO	8	0.51	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.13	0.00	0.00	0.15	0.00	

* Based on 2010 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: COLORADO															
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011															
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:															
Denver AA 19740	0	0.00	1.71	0.00	18.31	0.00	39.44	0.00	39.97	0.00	0.00	0.00	0.00	0.00	
Limited Review:															
Boulder MSA 14500	0	0.00	0.00	0.00	21.36	0.00	47.57	0.00	30.96	0.00	0.00	0.00	0.00	0.00	
Colorado Springs AA 17820	0	0.00	2.05	0.00	15.81	0.00	51.66	0.00	30.49	0.00	0.00	0.00	0.00	0.00	
Fort Collins-Loveland MSA 22660	0	0.00	0.92	0.00	14.13	0.00	56.22	0.00	28.73	0.00	0.00	0.00	0.00	0.00	
Greeley MSA 24540	3	13.04	0.70	0.00	6.33	0.00	66.22	100.00	26.74	0.00	0.34	0.00	0.00	0.52	
Non-MSA CO	20	86.96	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.42	0.00	0.00	1.45	

* Based on 2010 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															Geography: COLORADO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Denver AA19740	729	72.90	18.26	15.36	18.82	31.41	23.74	19.34	39.18	33.88	0.56	0.74	0.64	0.49	0.47									
Limited Review:																								
Boulder MSA 14500	45	4.50	19.44	6.82	18.52	15.91	22.39	18.18	39.66	59.09	0.25	0.18	0.27	0.00	0.43									
Colorado Springs AA 17820	155	15.50	17.17	12.26	18.97	34.84	24.84	23.23	39.03	29.68	0.46	0.44	0.50	0.46	0.42									
Fort Collins-Loveland MSA 22660	37	3.70	16.76	16.22	19.36	27.03	25.32	5.41	38.56	51.35	0.21	0.13	0.14	0.07	0.37									
Greeley MSA 24540	19	1.90	19.33	15.79	17.93	26.32	24.16	10.53	38.59	47.37	0.08	0.31	0.07	0.00	0.06									
Non-MSA CO	15	1.50	21.35	13.33	23.33	40.00	23.94	26.67	31.38	20.00	0.81	0.00	1.97	0.00	0.76									

* Based on 2010 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 0.1% of loans originated and purchased by bank. 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		Geography: COLORADO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Denver AA 19740	91	70.54	18.26	8.05	18.82	26.44	23.74	22.99	39.18	42.53	0.66	1.19	0.23	0.80	0.69	
Limited Review:																
Boulder MSA 14500	8	6.20	19.44	0.00	18.52	25.00	22.39	12.50	39.66	62.50	1.12	0.00	2.13	0.00	1.53	
Colorado Springs AA 17820	15	11.63	17.17	13.33	18.97	20.00	24.84	26.67	39.03	40.00	1.06	1.03	1.11	0.94	1.10	
Fort Collins-Loveland MSA 22660	11	8.53	16.76	0.00	19.36	27.27	25.32	27.27	38.56	45.45	1.30	0.00	1.56	2.70	0.78	
Greeley MSA 24540	3	2.33	19.33	0.00	17.93	33.33	24.16	33.33	38.59	33.33	0.00	0.00	0.00	0.00	0.00	
Non-MSA CO	1	0.78	21.35	0.00	23.33	0.00	23.94	100.00	31.38	0.00	2.04	0.00	0.00	7.69	0.00	

* Based on 2010 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 3.1% of loans originated and purchased by bank. 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			Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Denver AA 19740	765	68.61	18.26	7.01	18.82	13.89	23.74	25.40	39.18	53.70	0.34	0.35	0.29	0.34	0.35	
Limited Review:																
Boulder MSA 14500	54	4.84	19.44	13.21	18.52	20.75	22.39	11.32	39.66	54.72	0.10	0.00	0.13	0.03	0.14	
Colorado Springs AA 17820	152	13.63	17.17	6.90	18.97	21.38	24.84	24.83	39.03	46.90	0.28	0.26	0.27	0.24	0.31	
Fort Collins-Loveland MSA 22660	103	9.24	16.76	15.69	19.36	20.59	25.32	28.43	38.56	35.29	0.30	0.25	0.34	0.23	0.33	
Greeley MSA 24540	27	2.42	19.33	0.00	17.93	14.81	24.16	18.52	38.59	66.67	0.14	0.00	0.00	0.13	0.19	
Non-MSA CO	14	1.26	21.35	15.38	23.33	15.38	23.94	46.15	31.38	23.08	0.82	2.94	2.86	0.80	0.00	

* Based on 2010 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 1.7% of loans originated and purchased by bank. 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		Geography: COLORADO			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Denver AA 19740	1,347	84.98	68.49	46.77	47.81	18.56	33.63	0.56	0.42
Limited Review:									
Boulder MSA 14500	45	2.84	68.45	48.89	57.78	15.56	26.67	0.11	0.06
Colorado Springs AA 17820	86	5.43	70.60	61.63	77.91	9.30	12.79	0.18	0.25
Fort Collins-Loveland MSA 22660	66	4.16	72.53	71.21	78.79	7.58	13.64	0.17	0.17
Greeley MSA 24540	33	2.08	72.84	60.61	54.55	15.15	30.30	0.08	0.00
Non-MSA CO	8	0.50	72.98	37.50	75.00	0.00	25.00	0.13	0.00

* Based on 2010 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 12.30% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: COLORADO			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Denver AA 19740	0	0.00	96.10	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Boulder MSA 14500	0	0.00	97.09	0.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs AA 17820	0	0.00	96.82	0.00	0.00	0.00	0.00	0.00	0.00
Fort Collins-Loveland MSA 22660	0	0.00	97.62	0.00	0.00	0.00	0.00	0.00	0.00
Greeley MSA 24540	3	13.04	94.96	100.00	100.00	0.00	0.00	0.34	0.47
Non-MSA CO	20	86.96	95.80	100.00	40.00	55.00	5.00	1.42	1.88

* Based on 2010 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: COLORADO									
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Denver 19740 MSA	27	11,354	34	4,900	61	4	71.10	0	08
Limited Review:									
Boulder 14500 MSA	3	75	1	5,000	4	5,075	22.20	0	0
Colorado Springs 17820 MSA	3	912	0	0	3	912	3.99	0	0
Fort Collins-Loveland 2260 MSA	4	595	0	0	4	595	2.60	0	10
Greeley 24540 MSA	2	24	0	0	2	24	0.11	0	0
Non-MSA CO	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: COLORADO																	
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# 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:																	
Denver AA 19740	85.40	56	77.78	0.00	28.57	32.14	39.29	21	1	0	8	4	8	4.67	28.17	39.55	27.49
Limited Review:																	
Boulder MSA 14500	3.06	3	4.17	0.00	0.00	66.67	33.33	1	0	0	0	0	1	3.35	25.38	41.56	29.70
Colorado Springs AA 17820	3.73	5	6.94	0.00	40.00	40.00	20.00	0	0	0	0	0	0	0.34	26.24	47.96	25.46
Fort Collins-Loveland MSA 22660	6.11	5	6.94	0.00	40.00	40.00	20.00	0	0	0	0	0	0	3.28	19.05	59.01	18.66
Greeley MSA 24540	0.34	1	1.39	100.00	0.00	0.00	0.00	0	0	0	0	0	0	2.21	21.67	49.61	25.28
Non-MSA CO	1.36	2	2.78	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00

Table 1. Lending Volume

LENDING VOLUME												
Geography: CONNECTICUT												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Bridgeport-Stamford AA 14860	100.00	9	1,722	6	1,043	0	0	0	0	15	2,765	100.00

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CONNECTICUT				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *					
Full Review:															
Bridgeport-Stamford AA 14860	2	100.00	3.40	0.00	11.86	100.00	35.60	0.00	49.13	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 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		Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Overall	Low	Mod	Mid	Upp	
Full Review:																
Bridgeport-Stamford AA 14860	2	100.00	3.40	0.00	11.86	50.00	35.60	50.00	49.13	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 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 Geography: CONNECTICUT Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:															
Bridgeport-Stamford AA 14860	5	100.00	3.40	0.00	11.86	0.00	35.60	60.00	49.13	40.00	0.04	0.00	0.00	0.07	0.03

* Based on 2010 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
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	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Bridgeport-Stamford AA 14860	6	100.00	7.46	33.33	24.03	50.00	31.79	16.67	36.72	0.00	0.03	0.00	0.00	0.03	0.05									

* Based on 2010 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 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans**	% Families****	% BANK Loans**	% Families****	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Bridgeport-Stamford AA 14860	2	100.00	21.33	0.00	15.58	0.00	17.46	0.00	45.63	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 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. 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		Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Bridgeport-Stamford AA 14860	2	100.00	21.33	50.00	15.58	0.00	17.46	0.00	45.63	50.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 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. 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															Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Bridgeport-Stamford AA 14860	5	100.00	21.33	0.00	15.58	80.00	17.46	20.00	45.63	0.00	0.04	0.00	0.23	0.13	0.00									

* Based on 2010 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 0.0% of loans originated and purchased by bank. 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		Geography: CONNECTICUT			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Bridgeport-Stamford AA 14860	6	100.00	66.29	100.00	50.00	16.67	33.33	0.03	0.02

* Based on 2010 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 0.00% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: CONNECTICUT		Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bridgeport-Stamford AA 14860	0	0	0	0	0	0	0.00	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	1	999	0	0	1	999	100.00	2	28

* '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: CONNECTICUT Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# 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:																	
Bridgeport-Stamford AA 14860	100.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	10.51	19.26	31.89	38.35

Table 1. Lending Volume

LENDING VOLUME												
Geography: FLORIDA												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Naples-Marco Island MSA 34940	28.76	52	18,252	34	6,092	0	0	0	0	86	24,344	76.72
Limited Review:												
Cape Coral-Fort Myers MSA 15980	49.50	73	22,796	75	18,801	0	0	0	0	148	41,597	15.08
West Palm Beach MD 48424	21.74	36	44,817	29	9,301	0	0	0	0	65	54,118	8.20

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *					
Full Review:															
Naples-Marco Island MSA 34940	23	27.71	2.30	0.00	13.08	4.35	47.98	39.13	36.65	56.52	0.04	0.00	0.00	0.00	0.12
Limited Review:															
Cape Coral-Fort Myers MSA 15980	44	53.01	0.87	0.00	13.24	9.09	63.06	45.45	22.84	45.45	0.13	0.00	0.00	0.10	0.26
West Palm Beach MD 48424	16	19.28	1.53	0.00	24.63	12.50	36.35	0.00	37.50	87.50	0.05	0.00	0.04	0.00	0.09

* Based on 2010 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		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Naples-Marco Island MSA 34940	0	0.00	2.30	0.00	13.08	0.00	47.98	0.00	36.65	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Cape Coral-Fort Myers MSA 15980	3	42.86	0.87	0.00	13.24	33.33	63.06	66.67	22.84	0.00	0.00	0.00	0.00	0.00	0.00	
West Palm Beach MD 48424	4	57.14	1.53	0.00	24.63	25.00	36.35	50.00	37.50	25.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 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			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Naples-Marco Island MSA 34940	29	42.03	2.30	0.00	13.08	6.90	47.98	31.03	36.65	62.07	0.32	0.00	0.29	0.29	0.36	
Limited Review:																
Cape Coral-Fort Myers MSA 15980	26	37.68	0.87	0.00	13.24	0.00	63.06	23.08	22.84	76.92	0.15	0.00	0.00	0.03	0.29	
West Palm Beach MD 48424	14	20.29	1.53	0.00	24.63	14.29	36.35	14.29	37.50	71.43	0.04	0.00	0.00	0.00	0.07	

* Based on 2010 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: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Naples-Marco Island MSA 34940	0	0.00	2.08	0.00	7.03	0.00	35.11	0.00	55.78	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Cape Coral-Fort Myers MSA 15980	0	0.00	1.45	0.00	15.27	0.00	44.37	0.00	38.90	0.00	0.00	0.00	0.00	0.00	0.00	
West Palm Beach MD 48424	2	100.00	3.13	0.00	32.78	100.00	31.51	0.00	32.58	0.00	3.33	0.00	10.00	0.00	0.00	

* Based on 2010 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		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
Full Review:																
Naples-Marco Island MSA 34940	34	24.64	1.46	2.94	10.63	11.76	44.78	26.47	43.14	58.82	0.23	0.00	0.25	0.25	0.23	
Limited Review:																
Cape Coral-Fort Myers MSA 15980	75	54.35	0.63	0.00	12.13	16.00	60.60	58.67	26.64	25.33	0.26	0.00	0.14	0.34	0.17	
West Palm Beach MD 48424	29	21.01	2.78	3.45	19.29	27.59	34.19	20.69	43.62	48.28	0.03	0.00	0.05	0.02	0.03	

* Based on 2010 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 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Naples-Marco Island MSA 34940	23	27.71	19.06	4.35	19.32	0.00	20.65	8.70	40.97	86.96	0.04	0.00	0.00	0.00	0.08	
Limited Review:																
Cape Coral-Fort Myers MSA 15980	44	53.01	17.16	0.00	19.96	2.27	23.32	4.55	39.56	93.18	0.15	0.00	0.00	0.05	0.32	
West Palm Beach MD 48424	16	19.28	19.86	0.00	18.56	0.00	20.60	12.50	40.98	87.50	0.05	0.00	0.00	0.03	0.10	

* Based on 2010 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. 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		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Naples-Marco Island MSA 34940	0	0.00	19.06	0.00	19.32	0.00	20.65	0.00	40.97	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Cape Coral-Fort Myers MSA 15980	3	42.86	17.16	0.00	19.96	0.00	23.32	66.67	39.56	33.33	0.00	0.00	0.00	0.00	0.00	
West Palm Beach MD 48424	4	57.14	19.86	0.00	18.56	0.00	20.60	25.00	40.98	75.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 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. 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		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Naples-Marco Island MSA 34940	29	42.03	19.06	0.00	19.32	3.45	20.65	17.24	40.97	79.31	0.37	0.00	0.22	0.43	0.40	
Limited Review:																
Cape Coral-Fort Myers MSA 15980	26	37.68	17.16	0.00	19.96	0.00	23.32	11.54	39.56	88.46	0.18	0.00	0.00	0.00	0.30	
West Palm Beach MD 48424	14	20.29	19.86	0.00	18.56	0.00	20.60	7.14	40.98	92.86	0.05	0.00	0.00	0.00	0.08	

* Based on 2010 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 0.0% of loans originated and purchased by bank. 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		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Naples-Marco Island MSA 34940	34	24.64	70.10	50.00	55.88	23.53	20.59	0.23	0.18
Limited Review:									
Cape Coral-Fort Myers MSA 15980	75	54.35	71.76	53.33	33.33	30.67	36.00	0.26	0.41
West Palm Beach MD 48424	29	21.01	70.34	55.17	24.14	27.59	48.28	0.03	0.09

* Based on 2010 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 23.91% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: FLORIDA		Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Naples-Marco Island MSA 34940	0	0	2	10	2	10	0.20	0	0
Limited Review:									
Cape Coral-Fort Myers MSA 15980	0	0	1	5,000	1	5,000	99.80	0	0
West Palm Beach MD 48424	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: FLORIDA				Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Naples-Marco Island MSA 34940	76.81	1	33.33	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.48	18.77	45.24	28.51
Limited Review:																	
Cape Coral-Fort Myers MSA 15980	15.03	1	33.33	0.00	0.00	100.00	0.00	0	1	0	0	- 1	0	1.95	17.89	61.13	19.03
West Palm Beach MD 48424	8.16	1	33.33	0.00	0.00	100.00	0.00	0	0	0	0	0	0	4.21	29.32	33.88	32.37

Table 1. Lending Volume

LENDING VOLUME												
Geography: IDAHO												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Boise City-Nampa AA 14260	55.81	977	168,521	484	82,859	51	5,640	1	2,672	1,513	259,692	61.56
Limited Review:												
Idaho Falls AA 26820	9.63	186	28,661	71	16,206	3	535	1	2,000	261	47,402	9.22
Pocatello MSA 38540	8.12	97	21,652	89	21,156	33	4,916	1	1,065	220	48,789	9.75
Non-MSA ID	26.45	333	46,958	174	33,276	209	35,204	1	5,517	717	120,955	19.47

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: IDAHO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp	
Full Review:																
Boise City-Nampa AA 14260	315	74.64	0.80	0.00	15.47	13.97	49.07	35.24	34.66	50.79	0.61	0.00	0.84	0.41	0.78	
Limited Review:																
Idaho Falls AA 26820	49	11.61	0.00	0.00	13.46	8.16	59.72	65.31	26.83	26.53	0.58	0.00	0.49	0.41	1.04	
Pocatello MSA 38540	13	3.08	0.00	0.00	18.36	23.08	52.28	38.46	29.37	38.46	0.34	0.00	0.38	0.46	0.19	
Non-MSA ID	45	10.66	0.00	0.00	7.90	2.22	83.31	95.56	8.79	2.22	0.32	0.00	0.00	0.38	0.00	

* Based on 2010 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		Geography: IDAHO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Boise City-Nampa AA 14260	30	44.12	0.80	0.00	15.47	10.00	49.07	53.33	34.66	36.67	3.63	0.00	2.86	3.47	3.98	
Limited Review:																
Idaho Falls AA 26820	7	10.29	0.00	0.00	13.46	14.29	59.72	42.86	26.83	42.86	1.56	0.00	9.09	0.00	2.94	
Pocatello MSA 38540	6	8.82	0.00	0.00	18.36	16.67	52.28	66.67	29.37	16.67	1.11	0.00	0.00	2.70	0.00	
Non-MSA ID	25	36.76	0.00	0.00	7.90	4.00	83.31	92.00	8.79	4.00	3.88	0.00	0.00	4.09	6.25	

* Based on 2010 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												Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																				
Boise City-Nampa AA 14260	630	57.32	0.80	0.00	15.47	9.52	49.07	43.02	34.66	47.46	1.35	0.00	1.60	1.23	1.40					
Limited Review:																				
Idaho Falls AA 26820	130	11.83	0.00	0.00	13.46	3.08	59.72	66.15	26.83	30.77	1.35	0.00	0.51	1.59	1.07					
Pocatello MSA 38540	76	6.92	0.00	0.00	18.36	7.89	52.28	51.32	29.37	40.79	0.50	0.00	0.00	0.60	0.55					
Non-MSA ID	263	23.93	0.00	0.00	7.90	4.18	83.31	86.69	8.79	9.13	1.59	0.00	0.37	1.73	1.11					

* Based on 2010 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: IDAHO															
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:															
Boise City-Nampa AA 14260	2	50.00	1.80	0.00	38.41	0.00	32.85	50.00	26.94	50.00	16.67	0.00	0.00	33.33	25.00
Limited Review:															
Idaho Falls AA 26820	0	0.00	0.00	0.00	37.99	0.00	51.23	0.00	10.78	0.00	0.00	0.00	0.00	0.00	0.00
Pocatello MSA 38540	2	50.00	0.00	0.00	48.34	0.00	43.72	50.00	7.95	50.00	0.00	0.00	0.00	0.00	0.00
Non-MSA ID	0	0.00	0.00	0.00	26.25	0.00	66.06	0.00	7.68	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 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												Geography: IDAHO		Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
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	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Boise City-Nampa AA 14260	484	59.17	0.73	1.86	19.98	26.86	42.34	29.96	36.95	41.32	0.97	1.33	1.58	0.64	1.08			
Limited Review:																		
Idaho Falls AA 26820	71	8.68	0.00	0.00	19.34	23.94	53.49	43.66	27.17	32.39	0.77	0.00	0.51	0.63	1.36			
Pocatello MSA 38540	89	10.88	0.00	0.00	28.09	37.08	46.33	49.44	25.59	13.48	1.59	0.00	2.33	2.01	0.42			
Non-MSA ID	174	21.27	0.00	0.00	10.58	8.05	79.91	77.59	9.51	14.37	0.76	0.00	1.23	0.67	1.81			

* Based on 2010 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: IDAHO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Boise City-Nampa AA 14260	51	17.23	0.30	0.00	14.94	13.73	60.79	74.51	23.97	11.76	3.53	0.00	1.85	3.85	5.00	
Limited Review:																
Idaho Falls AA 26820	3	1.01	0.00	0.00	8.41	33.33	66.59	66.67	25.00	0.00	0.71	0.00	0.00	0.85	0.00	
Pocatello MSA 38540	33	11.15	0.00	0.00	7.66	0.00	73.78	72.73	18.56	27.27	8.16	0.00	0.00	7.59	16.67	
Non-MSA ID	209	70.61	0.00	0.00	4.67	2.39	88.66	94.74	6.67	2.87	3.98	0.00	6.67	4.20	1.32	

* Based on 2010 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		Geography: IDAHO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Boise City-Nampa AA 14260	315	74.64	17.47	5.71	18.97	21.90	23.73	18.73	39.83	53.65	0.69	0.26	0.42	0.60	1.23	
Limited Review:																
Idaho Falls AA 26820	49	11.61	17.46	12.24	18.26	18.37	23.21	20.41	41.07	48.98	0.67	0.00	0.22	0.44	1.52	
Pocatello MSA 38540	13	3.08	19.76	0.00	18.53	30.77	22.10	23.08	39.62	46.15	0.42	0.00	0.29	0.34	0.81	
Non-MSA ID	45	10.66	17.97	8.89	18.80	20.00	24.78	26.67	38.45	44.44	0.37	0.76	0.17	0.16	0.56	

* Based on 2010 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. 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		Geography: IDAHO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Boise City-Nampa AA 14260	30	44.12	17.47	10.34	18.97	20.69	23.73	13.79	39.83	55.17	3.60	2.44	3.70	1.82	5.10	
Limited Review:																
Idaho Falls AA 26820	7	10.29	17.46	0.00	18.26	16.67	23.21	16.67	41.07	66.67	0.84	0.00	0.00	0.00	1.49	
Pocatello MSA 38540	6	8.82	19.76	0.00	18.53	33.33	22.10	33.33	39.62	33.33	1.19	0.00	6.25	0.00	0.00	
Non-MSA ID	25	36.76	17.97	8.70	18.80	13.04	24.78	34.78	38.45	43.48	4.17	8.33	0.00	2.13	6.32	

* Based on 2010 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 5.9% of loans originated and purchased by bank. 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		Geography: IDAHO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers								
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:																	
Boise City-Nampa AA 14260	630	57.32	17.47	7.77	18.97	20.23	23.73	25.08	39.83	46.93	1.83	1.81	2.32	1.59	1.76		
Limited Review:																	
Idaho Falls AA 26820	130	11.83	17.46	5.43	18.26	19.38	23.21	21.71	41.07	53.49	1.79	1.31	1.62	1.75	1.95		
Pocatello MSA 38540	76	6.92	19.76	9.59	18.53	23.29	22.10	30.14	39.62	36.99	0.60	0.00	0.85	0.51	0.64		
Non-MSA ID	263	23.93	17.97	4.20	18.80	15.27	24.78	27.48	38.45	53.05	2.12	2.50	1.85	2.48	2.00		

* Based on 2010 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 1.5% of loans originated and purchased by bank. 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		Geography: IDAHO			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Boise City-Nampa AA 14260	484	59.17	72.53	58.26	61.78	16.74	21.49	0.97	1.10
Limited Review:									
Idaho Falls AA 26820	71	8.68	70.74	45.07	53.52	18.31	28.17	0.77	0.33
Pocatello MSA 38540	89	10.88	69.75	41.57	42.70	22.47	34.83	1.59	0.72
Non-MSA ID	174	21.27	72.12	56.90	57.47	19.54	22.99	0.76	0.83

* Based on 2010 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 8.19% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: IDAHO			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Boise City-Nampa AA 14260	51	17.23	96.66	100.00	64.71	29.41	5.88	3.53	4.78
Limited Review:									
Idaho Falls AA 26820	3	1.01	95.58	100.00	66.67	0.00	33.33	0.71	0.81
Pocatello MSA 38540	33	11.15	95.82	57.58	54.55	21.21	24.24	8.16	8.11
Non-MSA ID	209	70.61	94.90	73.21	41.15	36.84	22.01	3.98	3.52

* Based on 2010 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 0.68% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: IDAHO									
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Boise City-Nampa MSA 14260	1	175	15	2,755	16	2,930	21.75	0	0
Limited Review:									
Idaho Falls MSA 26820	0	0	1	1,946	1	1,946	14.79	0	0
Pocatello MSA 38540	0	0	8	538	8	538	3.80	0	0
Non-MSA Idaho	2	116	1	6,690	3	6,806	51.76	0	
Statewide Qualified Investments with potential benefit to one or more AAs	0	0	1	1,039	1	1,039	7.90	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: IDAHO				Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# 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:																	
Boise City-Nampa AA 14260	61.58	16	48.48	0.00	31.25	31.25	37.50	2	0	0	0	0	2	1.57	19.46	47.53	31.44
Limited Review:																	
Idaho Falls AA 26820	9.19	3	9.09	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	16.69	58.78	24.53
Pocatello MSA 38540	9.78	4	12.12	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	21.77	51.13	27.10
Non-MSA ID	19.45	10	30.30	0.00	20.00	80.00	0.00	0	0	0	0	0	0	0.00	11.85	80.31	7.85

Table 1. Lending Volume

LENDING VOLUME												
Geography: INDIANA												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Indianapolis-Carmel AA 26900	52.00	824	114,680	581	94,983	9	1,996	19	78,035	1,433	289,694	46.45
Limited Review:												
Anderson MSA 11300	6.39	129	8,833	46	12,899	1	53	0	0	176	21,785	5.14
Bloomington AA 14020	0.94	15	20,258	11	1,469	0	0	0	0	26	21,727	0.54
Elkhart-Goshen MSA 21140	14.77	306	36,027	101	15,502	0	0	0	0	407	51,529	11.52
Kokomo AA 29020	4.97	98	7,164	35	3,937	3	650	1	955	137	12,706	6.89
South Bend-Mishawaka MSA 43780	11.83	222	24,371	99	16,946	4	330	1	5,800	326	47,447	21.23
Non-MSA IN	9.11	178	24,854	65	9,859	8	950	0	0	251	35,663	8.23

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: INDIANA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis-Carmel AA 26900	302	49.19	3.07	1.99	18.67	12.58	48.70	50.99	29.55	34.44	0.45	1.56	0.94	0.40	0.38									
Limited Review:																								
Anderson MSA 11300	36	5.86	2.46	2.78	13.30	11.11	52.79	58.33	31.45	27.78	1.01	0.00	2.13	0.81	1.25									
Bloomington AA 14020	7	1.14	0.77	0.00	8.38	14.29	54.51	42.86	36.34	42.86	0.06	0.00	0.00	0.00	0.16									
Elkhart-Goshen MSA 21140	99	16.12	0.06	0.00	2.92	3.03	90.58	89.90	6.44	7.07	1.71	0.00	3.57	1.62	2.45									
Kokomo AA 29020	28	4.56	0.00	0.00	26.56	32.14	52.14	46.43	21.29	21.43	1.13	0.00	2.25	1.25	0.00									
South Bend-Mishawaka MSA 43780	82	13.36	1.29	1.22	19.73	14.63	51.29	51.22	27.68	32.93	0.99	0.00	1.10	1.22	0.67									
Non-MSA IN	60	9.77	0.00	0.00	3.89	11.67	86.38	83.33	9.73	5.00	0.94	0.00	4.69	0.94	0.00									

* Based on 2010 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		Geography: INDIANA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
Full Review:																
Indianapolis-Carmel AA 26900	93	47.69	3.07	0.00	18.67	8.60	48.70	62.37	29.55	29.03	2.04	0.00	2.50	1.84	2.37	
Limited Review:																
Anderson MSA 11300	22	11.28	2.46	0.00	13.30	9.09	52.79	63.64	31.45	27.27	0.89	0.00	0.00	1.75	0.00	
Bloomington AA 14020	0	0.00	0.77	0.00	8.38	0.00	54.51	0.00	36.34	0.00	0.00	0.00	0.00	0.00	0.00	
Elkhart-Goshen MSA 21140	29	14.87	0.06	0.00	2.92	10.34	90.58	86.21	6.44	3.45	8.92	0.00	20.00	8.33	14.29	
Kokomo AA 29020	17	8.72	0.00	0.00	26.56	47.06	52.14	29.41	21.29	23.53	8.96	0.00	18.75	7.69	0.00	
South Bend-Mishawaka MSA 43780	17	8.72	1.29	0.00	19.73	23.53	51.29	64.71	27.68	11.76	2.83	0.00	0.00	3.36	3.13	
Non-MSA IN	17	8.72	0.00	0.00	3.89	5.88	86.38	94.12	9.73	0.00	1.57	0.00	0.00	1.75	0.00	

* Based on 2010 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			Geography: INDIANA				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Indianapolis-Carmel AA 26900	429	44.64	3.07	0.70	18.67	4.90	48.70	43.82	29.55	50.58	0.36	0.32	0.30	0.33	0.39	
Limited Review:																
Anderson MSA 11300	71	7.39	2.46	0.00	13.30	7.04	52.79	52.11	31.45	40.85	1.01	0.00	3.28	1.06	0.85	
Bloomington AA 14020	7	0.73	0.77	0.00	8.38	14.29	54.51	28.57	36.34	57.14	0.05	0.00	0.00	0.00	0.11	
Elkhart-Goshen MSA 21140	178	18.52	0.06	0.00	2.92	0.56	90.58	88.76	6.44	10.67	2.01	0.00	0.00	1.96	2.77	
Kokomo AA 29020	53	5.52	0.00	0.00	26.56	28.30	52.14	49.06	21.29	22.64	1.98	0.00	3.57	2.36	0.91	
South Bend-Mishawaka MSA 43780	123	12.80	1.29	0.81	19.73	11.38	51.29	52.03	27.68	35.77	0.81	0.00	2.06	0.92	0.50	
Non-MSA IN	100	10.41	0.00	0.00	3.89	9.00	86.38	79.00	9.73	12.00	1.00	0.00	5.81	0.94	0.72	

* Based on 2010 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: INDIANA				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:															
Indianapolis-Carmel AA 26900	0	0.00	6.85	0.00	32.17	0.00	47.08	0.00	13.90	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Anderson MSA 11300	0	0.00	1.95	0.00	13.44	0.00	76.21	0.00	8.40	0.00	0.00	0.00	0.00	0.00	0.00
Bloomington AA 14020	1	50.00	25.20	0.00	18.67	0.00	33.44	100.00	22.69	0.00	0.00	0.00	0.00	0.00	0.00
Elkhart-Goshen MSA 21140	0	0.00	2.97	0.00	7.24	0.00	85.35	0.00	4.44	0.00	0.00	0.00	0.00	0.00	0.00
Kokomo AA 29020	0	0.00	0.00	0.00	41.20	0.00	50.84	0.00	7.96	0.00	0.00	0.00	0.00	0.00	0.00
South Bend-Mishawaka MSA 43780	0	0.00	2.28	0.00	30.66	0.00	42.25	0.00	24.82	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA IN	1	50.00	0.00	0.00	3.45	0.00	93.60	100.00	2.95	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 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												Geography: INDIANA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
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	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Indianapolis-Carmel AA 26900	581	61.94	2.45	2.58	14.45	11.88	48.06	44.23	34.98	41.31	0.80	1.22	0.79	0.78	0.83						
Limited Review:																					
Anderson MSA 11300	46	4.90	1.89	2.17	15.20	30.43	53.86	43.48	29.05	23.91	1.25	0.00	1.49	1.73	0.63						
Bloomington AA 14020	11	1.17	11.69	9.09	13.49	18.18	44.73	9.09	30.09	63.64	0.23	0.00	0.00	0.00	0.70						
Elkhart-Goshen MSA 21140	101	10.77	3.36	7.92	3.96	6.93	87.64	76.24	5.04	8.91	1.11	2.27	5.88	0.99	0.96						
Kokomo AA 29020	35	3.73	0.00	0.00	35.18	34.29	46.98	51.43	17.85	14.29	0.81	0.00	1.17	1.00	0.00						
South Bend-Mishawaka MSA 43780	99	10.55	1.53	0.00	24.82	21.21	46.80	45.45	26.84	33.33	1.17	0.00	0.75	1.09	1.91						
Non-MSA IN	65	6.93	0.00	0.00	4.30	10.77	87.09	80.00	8.60	9.23	0.91	0.00	5.13	0.99	0.00						

* Based on 2010 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: INDIANA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis-Carmel AA 26900	9	36.00	1.09	0.00	8.60	0.00	63.50	100.00	26.81	0.00	0.61	0.00	0.00	0.67	0.00									
Limited Review:																								
Anderson MSA 11300	1	4.00	0.54	0.00	3.93	0.00	50.71	100.00	44.82	0.00	0.00	0.00	0.00	0.00	0.00									
Bloomington AA 14020	0	0.00	1.81	0.00	3.92	0.00	65.66	0.00	28.61	0.00	0.00	0.00	0.00	0.00	0.00									
Elkhart-Goshen MSA 21140	0	0.00	0.37	0.00	0.87	0.00	97.01	0.00	1.74	0.00	0.00	0.00	0.00	0.00	0.00									
Kokomo AA 29020	3	12.00	0.00	0.00	7.71	0.00	53.46	33.33	38.83	66.67	0.00	0.00	0.00	0.00	0.00									
South Bend-Mishawaka MSA 43780	4	16.00	0.16	0.00	8.03	0.00	69.66	100.00	22.15	0.00	2.13	0.00	0.00	2.33	0.00									
Non-MSA IN	8	32.00	0.00	0.00	4.56	62.50	88.54	37.50	6.90	0.00	0.85	0.00	20.00	0.49	0.00									

* Based on 2010 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		Geography: INDIANA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Indianapolis-Carmel AA 26900	302	49.19	19.35	20.20	18.60	38.74	23.03	17.88	39.02	23.18	0.52	0.71	0.69	0.35	0.37	
Limited Review:																
Anderson MSA 11300	36	5.86	18.05	27.78	19.37	44.44	23.21	19.44	39.38	8.33	1.22	1.09	1.42	1.25	0.95	
Bloomington AA 14020	7	1.14	17.40	14.29	16.89	14.29	21.13	14.29	44.58	57.14	0.08	0.87	0.00	0.00	0.00	
Elkhart-Goshen MSA 21140	99	16.12	16.23	23.23	19.39	29.29	27.07	22.22	37.31	25.25	2.11	1.81	1.80	2.21	2.96	
Kokomo AA 29020	28	4.56	19.85	32.14	18.86	32.14	22.99	25.00	38.29	10.71	1.24	2.40	1.75	0.75	0.00	
South Bend-Mishawaka MSA 43780	82	13.36	18.53	28.05	18.63	30.49	23.48	18.29	39.36	23.17	1.24	1.64	1.49	1.22	0.75	
Non-MSA IN	60	9.77	14.26	11.67	18.34	31.67	26.64	20.00	40.76	36.67	1.07	1.21	1.37	0.93	0.84	

* Based on 2010 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. 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		Geography: INDIANA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Indianapolis-Carmel AA 26900	93	47.69	19.35	14.13	18.60	28.26	23.03	25.00	39.02	32.61	2.25	2.24	3.45	2.32	1.58	
Limited Review:																
Anderson MSA 11300	22	11.28	18.05	9.09	19.37	36.36	23.21	31.82	39.38	22.73	1.00	0.00	0.00	4.35	0.00	
Bloomington AA 14020	0	0.00	17.40	0.00	16.89	0.00	21.13	0.00	44.58	0.00	0.00	0.00	0.00	0.00	0.00	
Elkhart-Goshen MSA 21140	29	14.87	16.23	11.54	19.39	19.23	27.07	26.92	37.31	42.31	9.03	11.11	6.67	8.33	10.42	
Kokomo AA 29020	17	8.72	19.85	11.76	18.86	29.41	22.99	35.29	38.29	23.53	9.84	0.00	17.39	7.69	4.55	
South Bend-Mishawaka MSA 43780	17	8.72	18.53	11.76	18.63	35.29	23.48	23.53	39.36	29.41	3.06	0.00	2.08	6.67	2.67	
Non-MSA IN	17	8.72	14.26	12.50	18.34	31.25	26.64	6.25	40.76	50.00	1.68	0.00	4.62	0.00	1.09	

* Based on 2010 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 2.6% of loans originated and purchased by bank. 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															Geography: INDIANA					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Indianapolis-Carmel AA 26900	429	44.64	19.35	9.93	18.60	19.86	23.03	27.66	39.02	42.55	0.44	0.44	0.51	0.54	0.37									
Limited Review:																								
Anderson MSA 11300	71	7.39	18.05	22.54	19.37	26.76	23.21	25.35	39.38	25.35	1.30	3.05	1.25	1.12	1.12									
Bloomington AA 14020	7	0.73	17.40	14.29	16.89	0.00	21.13	28.57	44.58	57.14	0.08	0.00	0.00	0.17	0.07									
Elkhart-Goshen MSA 21140	178	18.52	16.23	9.66	19.39	26.70	27.07	28.41	37.31	35.23	2.29	2.15	2.83	2.50	1.90									
Kokomo AA 29020	53	5.52	19.85	18.87	18.86	18.87	22.99	22.64	38.29	39.62	2.32	3.92	1.28	2.80	2.13									
South Bend-Mishawaka MSA 43780	123	12.80	18.53	9.92	18.63	22.31	23.48	28.93	39.36	38.84	0.96	0.29	1.22	1.34	0.78									
Non-MSA IN	100	10.41	14.26	11.46	18.34	17.71	26.64	26.04	40.76	44.79	1.10	2.42	1.25	1.29	0.80									

* Based on 2010 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 1.5% of loans originated and purchased by bank. 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		Geography: INDIANA			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Indianapolis-Carmel AA 26900	581	61.94	65.74	54.73	59.72	19.10	21.17	0.80	1.48
Limited Review:									
Anderson MSA 11300	46	4.90	68.27	43.48	56.52	8.70	34.78	1.25	0.95
Bloomington AA 14020	11	1.17	65.43	63.64	63.64	27.27	9.09	0.23	0.48
Elkhart-Goshen MSA 21140	101	10.77	67.38	50.50	64.36	19.80	15.84	1.11	1.45
Kokomo AA 29020	35	3.73	67.05	60.00	74.29	11.43	14.29	0.81	1.04
South Bend-Mishawaka MSA 43780	99	10.55	65.55	62.63	69.70	10.10	20.20	1.17	1.80
Non-MSA IN	65	6.93	70.59	60.00	75.38	6.15	18.46	0.91	0.63

* Based on 2010 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 11.83% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: INDIANA			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Indianapolis-Carmel AA 26900	9	36.00	97.86	55.56	22.22	44.44	33.33	0.61	0.00
Limited Review:									
Anderson MSA 11300	1	4.00	99.11	100.00	100.00	0.00	0.00	0.00	0.00
Bloomington AA 14020	0	0.00	97.89	0.00	0.00	0.00	0.00	0.00	0.00
Elkhart-Goshen MSA 21140	0	0.00	98.88	0.00	0.00	0.00	0.00	0.00	0.00
Kokomo AA 29020	3	12.00	99.47	33.33	0.00	66.67	33.33	0.00	0.00
South Bend-Mishawaka MSA 43780	4	16.00	96.79	100.00	75.00	25.00	0.00	2.13	3.03
Non-MSA IN	8	32.00	98.04	100.00	62.50	25.00	12.50	0.85	1.19

* Based on 2010 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: INDIANA									
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Indianapolis-Carmel AA 26900	25	2,689	26	45,392	51	48,081	90.07	0	0
Limited Review:									
Anderson MSA 11300	6	262	0	0	6	262	0.49	0	0
Bloomington AA 14020	1	26	0	0	1	26	0.05	0	0
Elkhart-Goshen MSA 21140	5	557	1	10	6	567	1.06	0	0
Kokomo AA 29020	2	97	0	0	2	97	0.18	0	0
South Bend-Mishawaka MSA 43780	2	45	14	3,760	16	3,805	7.13	0	0
Non-MSA IN	1	75	0	0	1	75	0.14	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	8	465	0	0	8	465	0.88	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: INDIANA				Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Indianapolis-Carmel AA 26900	46.44	36	47.37	2.78	19.44	44.44	33.33	13	1	0	5	4	3	4.98	23.47	46.14	25.41
Limited Review:																	
Anderson MSA 11300	5.15	5	6.58	0.00	20.00	60.00	20.00	0	0	0	0	0	0	2.80	16.93	52.62	27.64
Bloomington AA 14020	0.54	1	1.32	0.00	0.00	0.00	100.00	0	0	0	0	0	0	14.07	15.72	43.21	27.00
Elkhart-Goshen MSA 21140	11.53	13	17.11	7.69	7.69	84.62	0.00	0	0	0	0	0	0	0.45	6.06	88.14	5.36
Kokomo AA 29020	6.88	5	6.58	0.00	60.00	40.00	0.00	0	0	0	0	0	0	0.00	31.30	49.52	19.18
South Bend-Mishawaka MSA 43780	21.22	8	10.53	0.00	25.00	50.00	25.00	0	1	0	0	- 1	0	1.84	24.20	49.83	24.13
Non-MSA IN	8.23	8	10.53	0.00	12.50	87.50	0.00	0	0	0	0	0	0	0.00	4.05	86.93	9.03

Table 1. Lending Volume

LENDING VOLUME												
Geography: MAINE												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Portland-South Portland -Biddeford MSA 38860	41.76	782	146,961	585	92,028	0	0	15	41,746	1,382	280,735	60.49
Limited Review:												
Bangor MSA 12620	10.43	197	19,228	138	25,749	9	1,697	1	750	345	47,424	6.72
Lewiston-Auburn MSA 30340	4.68	111	13,601	44	7,490	0	0	0	0	155	21,091	2.67
Non-MSA ME	43.12	994	119,257	383	58,904	48	9,706	2	1,600	1,427	189,467	30.12

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: MAINE					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp									
Full Review:																								
Portland-South Portland-Biddeford MSA 38860	244	37.31	0.32	1.23	8.72	18.44	75.71	68.44	15.26	11.89	1.12	1.61	2.62	1.02	0.76									
Limited Review:																								
Bangor MSA 12620	57	8.72	0.00	0.00	12.67	7.02	65.64	70.18	21.69	22.81	0.86	0.00	1.34	0.84	0.74									
Lewiston-Auburn MSA 30340	41	6.27	1.34	0.00	7.96	4.88	75.02	78.05	15.69	17.07	1.00	0.00	1.01	0.93	1.32									
Non-MSA ME	312	47.71	0.00	0.00	4.60	5.77	84.99	89.10	10.41	5.13	2.40	0.00	3.92	2.37	2.07									

* Based on 2010 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		Geography: MAINE					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Portland-South Portland-Biddeford MSA 38860	55	22.45	0.32	0.00	8.72	12.73	75.71	76.36	15.26	10.91	0.96	0.00	2.02	1.02	0.34	
Limited Review:																
Bangor MSA 12620	40	16.33	0.00	0.00	12.67	10.00	65.64	85.00	21.69	5.00	2.45	0.00	0.00	4.07	0.00	
Lewiston-Auburn MSA 30340	13	5.31	1.34	0.00	7.96	15.38	75.02	69.23	15.69	15.38	2.37	0.00	18.18	1.91	0.00	
Non-MSA ME	137	55.92	0.00	0.00	4.60	4.38	84.99	89.05	10.41	6.57	4.47	0.00	2.08	4.60	4.40	

* Based on 2010 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			Geography: MAINE				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Portland-South Portland-Biddeford MSA 38860	483	40.83	0.32	0.83	8.72	5.80	75.71	68.32	15.26	25.05	0.87	3.39	0.94	0.77	1.15	
Limited Review:																
Bangor MSA 12620	98	8.28	0.00	0.00	12.67	8.16	65.64	77.55	21.69	14.29	1.22	0.00	0.44	1.69	0.52	
Lewiston-Auburn MSA 30340	57	4.82	1.34	1.75	7.96	1.75	75.02	77.19	15.69	19.30	1.24	7.69	0.00	1.27	1.15	
Non-MSA ME	545	46.07	0.00	0.00	4.60	5.14	84.99	80.92	10.41	13.94	2.52	0.00	6.06	2.40	2.58	

* Based on 2010 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: MAINE				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:															
Portland-South Portland-Biddeford MSA 38860	0	0.00	6.36	0.00	24.62	0.00	64.22	0.00	4.79	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Bangor MSA 12620	2	100.00	0.00	0.00	40.03	0.00	39.91	100.00	20.07	0.00	0.00	0.00	0.00	0.00	0.00
Lewiston-Auburn MSA 30340	0	0.00	28.02	0.00	28.64	0.00	39.07	0.00	4.27	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA ME	0	0.00	0.00	0.00	8.31	0.00	82.91	0.00	8.77	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 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												Geography: MAINE		Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
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	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Portland-South Portland-Biddeford MSA 38860	585	50.87	1.52	1.20	14.14	15.90	71.71	68.89	12.63	14.02	1.56	0.75	2.04	1.73	0.88			
Limited Review:																		
Bangor MSA 12620	138	12.00	0.00	0.00	18.67	10.87	56.97	54.35	24.36	34.78	1.89	0.00	1.20	1.62	3.17			
Lewiston-Auburn MSA 30340	44	3.83	8.71	4.55	9.72	2.27	70.05	86.36	11.53	6.82	1.10	0.00	1.23	1.52	0.00			
Non-MSA ME	383	33.30	0.00	0.00	4.94	4.18	83.06	86.95	12.00	8.88	1.24	0.00	1.64	1.45	0.76			

* Based on 2010 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: MAINE															
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011															
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:															
Portland-South Portland-Biddeford MSA 38860	0	0.00	0.71	0.00	9.64	0.00	72.26	0.00	17.40	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Bangor MSA 12620	9	15.79	0.00	0.00	15.31	22.22	63.70	77.78	20.99	0.00	12.90	0.00	100.00	12.50	0.00
Lewiston-Auburn MSA 30340	0	0.00	2.12	0.00	4.24	0.00	73.31	0.00	20.34	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA ME	48	84.21	0.00	0.00	4.56	2.08	84.24	97.92	11.20	0.00	2.42	0.00	0.00	3.15	0.00

* Based on 2010 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		Geography: MAINE					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***						
Full Review:																
Portland-South Portland-Biddeford MSA 38860	244	37.31	17.58	7.00	19.29	25.93	25.12	24.69	38.01	42.39	1.30	1.44	1.45	0.96	1.40	
Limited Review:																
Bangor MSA 12620	57	8.72	20.39	10.53	17.26	24.56	23.04	26.32	39.31	38.60	1.00	1.87	1.54	0.00	1.14	
Lewiston-Auburn MSA 30340	41	6.27	18.49	4.88	18.69	43.90	24.29	17.07	38.53	34.15	1.11	1.18	1.48	0.88	0.95	
Non-MSA ME	312	47.71	18.40	11.22	18.75	26.28	23.40	25.32	39.45	37.18	2.74	3.67	3.30	2.06	2.65	

* Based on 2010 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 0.2% of loans originated and purchased by bank. 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		Geography: MAINE					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Portland-South Portland-Biddeford MSA 38860	55	22.45	17.58	3.77	19.29	13.21	25.12	30.19	38.01	52.83	0.92	0.00	0.32	1.42	1.09	
Limited Review:																
Bangor MSA 12620	40	16.33	20.39	16.22	17.26	18.92	23.04	29.73	39.31	35.14	2.52	2.94	3.13	3.33	1.78	
Lewiston-Auburn MSA 30340	13	5.31	18.49	23.08	18.69	15.38	24.29	15.38	38.53	46.15	2.42	0.00	5.71	1.67	2.13	
Non-MSA ME	137	55.92	18.40	15.79	18.75	19.55	23.40	32.33	39.45	32.33	4.58	5.22	4.33	7.84	2.14	

* Based on 2010 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 3.7% of loans originated and purchased by bank. 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		Geography: MAINE					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Portland-South Portland-Biddeford MSA 38860	483	40.83	17.58	5.83	19.29	16.88	25.12	24.17	38.01	53.13	1.05	0.94	0.83	1.05	1.12	
Limited Review:																
Bangor MSA 12620	98	8.28	20.39	8.33	17.26	12.50	23.04	22.92	39.31	56.25	1.45	0.88	0.65	1.72	1.59	
Lewiston-Auburn MSA 30340	57	4.82	18.49	8.93	18.69	12.50	24.29	33.93	38.53	44.64	1.51	5.00	1.15	1.72	1.25	
Non-MSA ME	545	46.07	18.40	4.13	18.75	17.26	23.40	30.39	39.45	48.22	2.94	2.76	3.60	3.45	2.55	

* Based on 2010 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 1.5% of loans originated and purchased by bank. 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		Geography: MAINE			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Portland-South Portland-Biddeford MSA 38860	585	50.87	68.88	51.11	63.42	17.26	19.32	1.56	2.08
Limited Review:									
Bangor MSA 12620	138	12.00	62.27	39.86	57.97	19.57	22.46	1.89	1.58
Lewiston-Auburn MSA 30340	44	3.83	69.41	59.09	65.91	9.09	25.00	1.10	2.23
Non-MSA ME	383	33.30	67.07	52.22	64.75	17.23	18.02	1.24	1.12

* Based on 2010 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 6.70% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MAINE			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Portland-South Portland-Biddeford MSA 38860	0	0.00	96.71	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Bangor MSA 12620	9	15.79	96.05	66.67	44.44	11.11	44.44	12.90	14.81
Lewiston-Auburn MSA 30340	0	0.00	96.61	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA ME	48	84.21	97.57	75.00	39.58	35.42	25.00	2.42	2.02

* Based on 2010 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 1.75% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: MAINE		Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Portland-South Portland-Biddeford MSA 38860	43	10,233	20	6,187	63	16,419	88.25	1	400
Limited Review:									
Bangor MSA 12620	5	483	2	10	7	493	2.65	0	0 0
Lewiston-Auburn MSA 30340	5	126	2	289	7	415	2.23	0	00
Non-MSA ME	13	1,259	2	20	15	1,279	6.87	0	0 6

* '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: MAINE				Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Portland-South Portland-Biddeford MSA 38860	60.50	26	41.94	0.00	11.54	76.92	11.54	0	0	0	0	0	0	1.33	11.65	73.75	13.26
Limited Review:																	
Bangor MSA 12620	6.71	6	9.68	0.00	16.67	66.67	16.67	0	1	0	0	- 1	0	0.00	19.01	59.64	21.35
Lewiston-Auburn MSA 30340	2.69	3	4.84	66.67	0.00	33.33	0.00	0	0	0	0	0	0	6.13	14.25	66.93	12.69
Non-MSA ME	30.11	27	43.55	0.00	7.41	88.89	3.70	0	1	0	0	- 1	0	0.00	5.18	84.84	9.98

Table 1. Lending Volume

LENDING VOLUME		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Ann Arbor MSA 11460	26.15	178	26,431	128	17,055	0	0	1	4,282	307	47,768	56.64
Limited Review:												
Detroit-Livonia-Dearborn MD 19804	12.52	77	6,692	68	13,760	0	0	2	4,772	147	25,224	7.02
Monroe MSA 33780	18.31	164	17,866	51	6,050	0	0	0	0	215	23,916	10.62
Warren-Troy-Farmington Hills AA 47644	26.15	202	34,291	105	20,656	0	0	0	0	307	54,947	11.74
Non-MSA MI	16.87	156	13,469	41	6,726	1	248	0	0	198	20,443	13.98

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp									
Full Review:																								
Ann Arbor MSA 11460	57	18.69	2.07	5.26	13.42	17.54	55.60	49.12	28.90	28.07	0.26	2.38	0.86	0.16	0.15									
Limited Review:																								
Detroit-Livonia-Dearborn MD 19804	36	11.80	3.81	0.00	22.11	0.00	38.26	47.22	35.82	52.78	0.11	0.00	0.00	0.11	0.11									
Monroe MSA 33780	72	23.61	0.58	0.00	1.35	0.00	94.57	98.61	3.51	1.39	0.74	0.00	0.00	0.79	0.00									
Warren-Troy-Farmington Hills AA 47644	88	28.85	0.79	1.14	17.10	7.95	52.51	52.27	29.60	38.64	0.12	0.00	0.11	0.12	0.12									
Non-MSA MI	52	17.05	0.00	0.00	2.23	0.00	61.80	51.92	35.97	48.08	1.11	0.00	0.00	1.02	1.31									

* Based on 2010 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			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Ann Arbor MSA 11460	14	11.48	2.07	0.00	13.42	28.57	55.60	35.71	28.90	35.71	1.65	0.00	3.85	1.45	1.35	
Limited Review:																
Detroit-Livonia-Dearborn MD 19804	22	18.03	3.81	0.00	22.11	9.09	38.26	36.36	35.82	54.55	0.75	0.00	0.00	0.65	1.23	
Monroe MSA 33780	16	13.11	0.58	0.00	1.35	0.00	94.57	100.00	3.51	0.00	4.95	0.00	0.00	5.26	0.00	
Warren-Troy-Farmington Hills AA 47644	49	40.16	0.79	0.00	17.10	4.08	52.51	57.14	29.60	38.78	1.73	0.00	0.00	1.71	2.87	
Non-MSA MI	21	17.21	0.00	0.00	2.23	0.00	61.80	61.90	35.97	38.10	7.19	0.00	0.00	3.09	17.95	

* Based on 2010 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		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Ann Arbor MSA 11460	107	30.84	2.07	0.93	13.42	8.41	55.60	40.19	28.90	50.47	0.45	0.84	0.72	0.31	0.55	
Limited Review:																
Detroit-Livonia-Dearborn MD 19804	19	5.48	3.81	0.00	22.11	5.26	38.26	26.32	35.82	68.42	0.04	0.00	0.00	0.04	0.04	
Monroe MSA 33780	76	21.90	0.58	0.00	1.35	1.32	94.57	90.79	3.51	7.89	1.16	0.00	0.00	1.15	1.43	
Warren-Troy-Farmington Hills AA 47644	62	17.87	0.79	0.00	17.10	1.61	52.51	59.68	29.60	38.71	0.06	0.00	0.00	0.08	0.04	
Non-MSA MI	83	23.92	0.00	0.00	2.23	0.00	61.80	43.37	35.97	56.63	1.02	0.00	0.00	0.90	1.20	

* Based on 2010 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: MICHIGAN				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:															
Ann Arbor MSA 11460	0	0.00	22.08	0.00	30.13	0.00	39.91	0.00	7.88	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Detroit-Livonia-Dearborn MD 19804	0	0.00	13.15	0.00	27.75	0.00	35.30	0.00	23.80	0.00	0.00	0.00	0.00	0.00	0.00
Monroe MSA 33780	0	0.00	0.17	0.00	6.67	0.00	93.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Warren-Troy-Farmington Hills AA 47644	3	100.00	5.18	0.00	26.09	0.00	56.40	100.00	12.33	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA MI	0	0.00	0.00	0.00	4.16	0.00	78.58	0.00	17.25	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 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		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
Full Review:																
Ann Arbor MSA 11460	128	32.57	9.43	7.81	11.99	14.84	52.34	42.19	26.24	35.16	0.58	0.57	0.19	0.52	0.86	
Limited Review:																
Detroit-Livonia-Dearborn MD 19804	68	17.30	5.34	8.82	21.67	16.18	35.29	38.24	37.30	36.76	0.10	0.00	0.04	0.11	0.12	
Monroe MSA 33780	51	12.98	0.64	0.00	2.24	0.00	94.35	96.08	2.77	3.92	1.10	0.00	0.00	1.02	6.90	
Warren-Troy-Farmington Hills AA 47644	105	26.72	1.75	3.81	15.53	20.00	50.34	40.00	32.24	36.19	0.06	0.35	0.11	0.05	0.04	
Non-MSA MI	41	10.43	0.00	0.00	1.84	2.44	62.93	68.29	35.23	29.27	0.98	0.00	6.25	0.91	1.01	

* Based on 2010 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: MICHIGAN					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Ann Arbor MSA 11460	0	0.00	2.18	0.00	6.24	0.00	60.85	0.00	30.72	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Detroit-Livonia-Dearborn MD 19804	0	0.00	3.36	0.00	16.79	0.00	41.45	0.00	38.31	0.00	0.00	0.00	0.00	0.00	0.00	
Monroe MSA 33780	0	0.00	0.14	0.00	0.42	0.00	97.21	0.00	2.23	0.00	0.00	0.00	0.00	0.00	0.00	
Warren-Troy-Farmington Hills AA 47644	0	0.00	1.68	0.00	14.59	0.00	58.37	0.00	25.35	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA MI	1	100.00	0.00	0.00	0.38	0.00	63.25	100.00	36.36	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 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															
Geography: MICHIGAN							Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011								
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor MSA 11460	57	18.69	19.62	26.32	18.04	22.81	22.71	21.05	39.63	29.82	0.31	0.65	0.10	0.35	0.28
Limited Review:															
Detroit-Livonia-Dearborn MD 19804	36	11.80	23.09	13.89	16.60	25.00	19.31	30.56	41.01	30.56	0.12	0.07	0.08	0.09	0.18
Monroe MSA 33780	72	23.61	17.78	16.67	19.03	36.11	25.15	22.22	38.05	25.00	0.79	0.00	1.12	0.59	1.29
Warren-Troy-Farmington Hills AA 47644	88	28.85	17.64	17.05	18.11	22.73	23.75	29.55	40.50	30.68	0.13	0.10	0.14	0.12	0.16
Non-MSA MI	52	17.05	13.38	19.23	16.13	21.15	23.49	26.92	47.00	32.69	1.19	2.69	0.69	0.60	1.54

* Based on 2010 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. 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		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Ann Arbor MSA 11460	14	11.48	19.62	14.29	18.04	21.43	22.71	21.43	39.63	42.86	1.72	2.63	4.17	0.00	1.15	
Limited Review:																
Detroit-Livonia-Dearborn MD 19804	22	18.03	23.09	4.55	16.60	18.18	19.31	13.64	41.01	63.64	0.77	0.00	0.49	0.00	2.27	
Monroe MSA 33780	16	13.11	17.78	37.50	19.03	18.75	25.15	6.25	38.05	37.50	5.05	5.56	6.90	0.00	6.90	
Warren-Troy-Farmington Hills AA 47644	49	40.16	17.64	0.00	18.11	8.16	23.75	28.57	40.50	63.27	1.80	0.00	0.29	1.60	5.56	
Non-MSA MI	21	17.21	13.38	14.29	16.13	19.05	23.49	38.10	47.00	28.57	7.52	9.52	10.00	5.41	6.67	

* Based on 2010 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. 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			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Ann Arbor MSA 11460	107	30.84	19.62	15.89	18.04	21.50	22.71	23.36	39.63	39.25	0.55	1.75	0.69	0.34	0.46	
Limited Review:																
Detroit-Livonia-Dearborn MD 19804	19	5.48	23.09	5.56	16.60	16.67	19.31	5.56	41.01	72.22	0.05	0.24	0.07	0.00	0.05	
Monroe MSA 33780	76	21.90	17.78	10.67	19.03	24.00	25.15	33.33	38.05	32.00	1.28	1.83	1.43	1.48	0.92	
Warren-Troy-Farmington Hills AA 47644	62	17.87	17.64	11.67	18.11	21.67	23.75	20.00	40.50	46.67	0.07	0.09	0.09	0.05	0.06	
Non-MSA MI	83	23.92	13.38	9.76	16.13	24.39	23.49	20.73	47.00	45.12	1.13	3.67	1.81	0.38	1.00	

* Based on 2010 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 1.4% of loans originated and purchased by bank. 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		Geography: MICHIGAN			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Ann Arbor MSA 11460	128	32.57	68.40	57.03	71.09	7.81	21.09	0.58	0.70
Limited Review:									
Detroit-Livonia-Dearborn MD 19804	68	17.30	67.41	51.47	52.94	22.06	25.00	0.10	0.19
Monroe MSA 33780	51	12.98	69.20	56.86	74.51	7.84	17.65	1.10	0.81
Warren-Troy-Farmington Hills AA 47644	105	26.72	69.49	46.67	54.29	18.10	27.62	0.06	0.03
Non-MSA MI	41	10.43	70.07	56.10	73.17	4.88	21.95	0.98	0.82

* Based on 2010 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 9.67% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MICHIGAN			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Ann Arbor MSA 11460	0	0.00	97.42	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Detroit-Livonia-Dearborn MD 19804	0	0.00	97.30	0.00	0.00	0.00	0.00	0.00	0.00
Monroe MSA 33780	0	0.00	97.07	0.00	0.00	0.00	0.00	0.00	0.00
Warren-Troy-Farmington Hills AA 47644	0	0.00	96.90	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA MI	1	100.00	98.66	100.00	0.00	100.00	0.00	0.00	0.00

* Based on 2010 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MICHIGAN									
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Ann Arbor MSA 11460	6	884	4	25	10	909	3.08	0	0
Limited Review:									
Detroit-Livonia-Dearborn MD 19804	81	12,498	3	7,846	84	20,344	68.84	1	58
Monroe MSA 33780	0	0	0	0	0	0	0.00	0	0
Warren-Troy-Farmington Hills AA 47644	14	745	1	5,600	15	6,345	21.47	0	0
Non-MSA MI	7	598	0	0	7	598	2.02	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	88	1,356	0	0	88	1,356	4.59	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MICHIGAN																	
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# 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:																	
Ann Arbor MSA 11460	56.68	10	31.25	10.00	10.00	80.00	0.00	0	0	0	0	0	0	11.48	18.11	48.69	21.72
Limited Review:																	
Detroit-Livonia-Dearborn MD 19804	7.06	4	12.50	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.80	30.49	33.77	27.85
Monroe MSA 33780	10.59	4	12.50	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.03	2.15	93.50	3.33
Warren-Troy-Farmington Hills AA 47644	11.74	7	21.88	0.00	28.57	42.86	28.57	0	3	0	- 1	- 1	- 1	1.73	18.59	51.65	28.01
Non-MSA MI	13.93	7	21.88	0.00	0.00	71.43	28.57	0	0	0	0	0	0	0.00	2.59	64.87	32.54

Table 1. Lending Volume

LENDING VOLUME												
Geography: OREGON												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Salem MSA 41420	38.75	467	74,221	198	40,845	172	39,736	0	0	837	154,802	26.35
Limited Review:												
Corvallis MSA 18700	4.12	66	12,269	15	6,104	8	1,872	0	0	89	20,245	1.68
Eugene-Springfield MSA 21660	21.02	325	48,635	111	11,933	17	2,770	1	4,149	454	67,487	25.55
Medford MSA 32780	15.65	243	44,335	93	9,017	0	0	2	13,252	338	66,604	21.07
Non-MSA OR	20.46	278	40,856	103	17,760	61	11,184	0	0	442	69,800	25.36

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: OREGON					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp									
Full Review:																								
Salem MSA 41420	141	37.80	0.09	0.00	14.36	30.50	59.70	46.81	25.85	22.70	1.23	0.00	2.88	0.97	1.04									
Limited Review:																								
Corvallis MSA 18700	27	7.24	0.00	0.00	26.55	51.85	28.42	25.93	45.02	22.22	1.55	0.00	3.52	1.93	0.23									
Eugene-Springfield MSA 21660	71	19.03	0.53	1.41	10.64	18.31	65.10	63.38	23.73	16.90	0.67	0.00	2.00	0.59	0.40									
Medford MSA 32780	66	17.69	0.31	1.52	15.60	25.76	56.76	45.45	27.33	27.27	0.83	8.33	1.50	0.48	0.99									
Non-MSA OR	68	18.23	0.00	0.00	7.14	4.41	68.80	70.59	24.06	25.00	0.84	0.00	0.00	0.87	0.91									

* Based on 2010 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		Geography: OREGON					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Salem MSA 41420	20	25.97	0.09	0.00	14.36	35.00	59.70	45.00	25.85	20.00	3.24	0.00	9.38	2.94	1.82	
Limited Review:																
Corvallis MSA 18700	2	2.60	0.00	0.00	26.55	0.00	28.42	50.00	45.02	50.00	1.64	0.00	0.00	0.00	2.70	
Eugene-Springfield MSA 21660	22	28.57	0.53	0.00	10.64	0.00	65.10	54.55	23.73	45.45	4.46	0.00	0.00	4.82	5.06	
Medford MSA 32780	17	22.08	0.31	0.00	15.60	17.65	56.76	52.94	27.33	29.41	6.14	0.00	15.38	4.55	5.71	
Non-MSA OR	16	20.78	0.00	0.00	7.14	0.00	68.80	68.75	24.06	31.25	3.01	0.00	0.00	2.27	6.67	

* Based on 2010 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												Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																				
Salem MSA 41420	306	32.94	0.09	0.00	14.36	9.80	59.70	60.78	25.85	29.41	1.08	0.00	1.09	1.07	1.11					
Limited Review:																				
Corvallis MSA 18700	37	3.98	0.00	0.00	26.55	29.73	28.42	18.92	45.02	51.35	0.71	0.00	1.19	0.55	0.58					
Eugene -Springfield MSA 21660	232	24.97	0.53	0.00	10.64	5.60	65.10	69.83	23.73	24.57	0.90	0.00	0.75	0.95	0.84					
Medford MSA 32780	160	17.22	0.31	0.00	15.60	8.75	56.76	50.00	27.33	41.25	1.34	0.00	0.69	1.31	1.58					
Non-MSA OR	194	20.88	0.00	0.00	7.14	1.55	68.80	68.56	24.06	29.90	1.21	0.00	0.55	1.33	1.01					

* Based on 2010 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
Full Review:																
Salem MSA 41420	198	38.08	0.24	0.00	20.52	21.72	56.65	58.08	22.58	20.20	1.07	0.00	1.20	1.28	0.90	
Limited Review:																
Corvallis MSA 18700	15	2.88	0.00	0.00	41.84	26.67	23.27	33.33	34.89	40.00	0.17	0.00	0.00	0.68	0.00	
Eugene- Springfield MSA 21660	111	21.35	4.10	0.90	16.15	15.32	57.63	65.77	22.12	18.02	0.56	0.00	0.60	0.70	0.53	
Medford MSA 32780	93	17.88	5.09	6.45	21.11	26.88	49.48	38.71	24.32	27.96	0.42	0.00	0.82	0.39	0.32	
Non-MSA OR	103	19.81	0.00	0.00	6.97	0.00	69.38	78.64	23.65	21.36	0.84	0.00	0.00	1.15	0.46	

* Based on 2010 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: OREGON															
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011															
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:															
Salem MSA 41420	172	66.67	0.09	0.00	8.04	0.00	72.74	87.21	19.13	12.79	15.75	0.00	0.00	20.00	8.82
Limited Review:															
Corvallis MSA 18700	8	3.10	0.00	0.00	20.90	0.00	53.52	37.50	25.59	62.50	7.50	0.00	0.00	4.76	18.18
Eugene -Springfield MSA 21660	17	6.59	1.34	0.00	8.25	11.76	70.59	64.71	19.82	23.53	5.63	0.00	0.00	9.09	0.00
Medford MSA 32780	0	0.00	1.93	0.00	14.34	0.00	59.01	0.00	24.72	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA OR	61	23.64	0.00	0.00	6.31	0.00	69.73	95.08	23.96	4.92	12.14	0.00	0.00	16.19	0.00

* Based on 2010 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															Geography: OREGON					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Salem MSA 41420	141	37.80	18.49	9.22	18.97	29.08	23.62	21.99	38.92	39.72	1.33	2.65	1.97	0.92	0.94									
Limited Review:																								
Corvallis MSA 18700	27	7.24	19.62	3.70	18.42	18.52	22.30	40.74	39.65	37.04	1.64	2.17	1.00	1.53	2.03									
Eugene- Springfield MSA 21660	71	19.03	19.02	8.45	18.57	36.62	22.91	15.49	39.49	39.44	0.75	1.74	0.97	0.50	0.67									
Medford MSA 32780	66	17.69	19.34	3.03	18.89	22.73	21.45	21.21	40.32	53.03	0.93	0.60	0.56	0.60	1.40									
Non-MSA OR	68	18.23	18.50	8.82	17.85	35.29	22.88	25.00	40.77	30.88	0.91	2.00	1.91	0.39	0.66									

* Based on 2010 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. 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		Geography: OREGON					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Salem MSA 41420	20	25.97	18.49	10.53	18.97	31.58	23.62	21.05	38.92	36.84	3.30	0.00	5.26	3.23	2.86	
Limited Review:																
Corvallis MSA 18700	2	2.60	19.62	0.00	18.42	0.00	22.30	50.00	39.65	50.00	1.67	0.00	0.00	6.25	0.00	
Eugene- Springfield MSA 21660	22	28.57	19.02	18.18	18.57	22.73	22.91	9.09	39.49	50.00	4.69	12.00	6.38	1.28	4.72	
Medford MSA 32780	17	22.08	19.34	11.76	18.89	35.29	21.45	17.65	40.32	35.29	6.73	7.69	13.64	0.00	6.12	
Non-MSA OR	16	20.78	18.50	12.50	17.85	12.50	22.88	31.25	40.77	43.75	3.09	10.00	4.17	0.00	3.57	

* Based on 2010 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 1.3% of loans originated and purchased by bank. 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			Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Salem MSA 41420	306	32.94	18.49	6.62	18.97	19.21	23.62	26.49	38.92	47.68	1.32	1.83	1.67	1.13	1.26	
Limited Review:																
Corvallis MSA 18700	37	3.98	19.62	8.11	18.42	21.62	22.30	16.22	39.65	54.05	0.84	0.92	1.20	0.55	0.87	
Eugene- Springfield MSA 21660	232	24.97	19.02	6.09	18.57	23.48	22.91	29.13	39.49	41.30	1.11	1.20	1.56	1.21	0.90	
Medford MSA 32780	160	17.22	19.34	5.03	18.89	13.21	21.45	23.90	40.32	57.86	1.64	3.21	1.96	1.13	1.64	
Non-MSA OR	194	20.88	18.50	3.13	17.85	19.27	22.88	25.52	40.77	52.08	1.49	1.35	1.18	1.72	1.46	

* Based on 2010 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 1.0% of loans originated and purchased by bank. 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		Geography: OREGON			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Salem MSA 41420	198	38.08	70.24	42.93	54.55	20.20	25.25	1.07	1.07
Limited Review:									
Corvallis MSA 18700	15	2.88	68.07	33.33	40.00	13.33	46.67	0.17	0.18
Eugene- Springfield MSA 21660	111	21.35	70.00	66.67	78.38	8.11	13.51	0.56	0.99
Medford MSA 32780	93	17.88	72.66	63.44	77.42	10.75	11.83	0.42	0.55
Non-MSA OR	103	19.81	70.97	59.22	66.99	9.71	23.30	0.84	0.91

* Based on 2010 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 6.73% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OREGON			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Salem MSA 41420	172	66.67	93.39	67.44	26.16	34.88	38.95	15.75	17.58
Limited Review:									
Corvallis MSA 18700	8	3.10	96.48	37.50	25.00	25.00	50.00	7.50	4.00
Eugene -Springfield MSA 21660	17	6.59	97.25	58.82	47.06	17.65	35.29	5.63	5.66
Medford MSA 32780	0	0.00	97.61	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA OR	61	23.64	96.61	67.21	42.62	34.43	22.95	12.14	12.79

* Based on 2010 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 1.94% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: OREGON		Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Salem MSA 41420	4	122	3	5	7	127	0.40	0	0 5
Limited Review:									
Corvallis MSA 18700	0	0	0	0	0	0	0.00	0	0
Eugene-Springfield MSA 21660	6	224	2	4,356	8	4,579	14.74	0	19
Medford MSA 32780	12	6,109	1	12,960	13	19,069	61.37	0	0
Non-MSA OR	3	3,022	3	4,277	6	7,299	23.49	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: OREGON																	
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# 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:																	
Salem MSA 41420	26.34	9	29.03	0.00	11.11	66.67	22.22	1	0	0	0	0	1	0.98	21.38	56.75	20.89
Limited Review:																	
Corvallis MSA 18700	1.68	1	3.23	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	43.47	23.14	33.39
Eugene- Springfield MSA 21660	25.50	8	25.81	0.00	25.00	62.50	12.50	0	0	0	0	0	0	2.90	14.69	61.85	20.56
Medford MSA 32780	21.09	5	16.13	20.00	20.00	40.00	20.00	0	0	0	0	0	0	1.16	22.53	52.66	23.65
Non-MSA OR	25.39	8	25.81	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	7.33	70.22	22.45

Table 1. Lending Volume

LENDING VOLUME												
Geography: UTAH												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Salt Lake City MSA 41620	54.20	843	165,735	499	125,080	39	4,244	5	18,365	1,386	313,424	82.67
Limited Review:												
Logan MSA 30860	3.29	53	8,122	29	3,841	1	100	1	5,000	84	17,063	1.37
Ogden-Clearfield AA 36260	26.09	438	87,678	228	40,139	1	75	0	0	667	127,892	9.69
Provo- Orem AA 39340	11.93	225	38,411	80	15,694	0	0	0	0	305	54,105	2.51
Non-MSA UT	4.50	47	4,254	26	1,209	40	3,992	2	12,180	115	21,635	3.76

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: UTAH				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Salt Lake City MSA 41620	299	48.54	0.20	0.00	16.53	21.74	52.75	51.84	30.52	26.42	0.38	0.00	0.70	0.38	0.22	
Limited Review:																
Logan MSA 30860	18	2.92	0.31	0.00	20.62	22.22	42.42	33.33	36.65	44.44	0.23	0.00	0.42	0.31	0.00	
Ogden –Clearfield AA 36260	171	27.76	0.85	0.00	13.75	16.37	58.75	60.82	26.65	22.81	0.49	0.00	0.31	0.57	0.40	
Provo- Orem AA 39340	113	18.34	1.44	0.88	11.29	5.31	53.20	54.87	34.07	38.94	0.22	0.00	0.30	0.17	0.31	
Non-MSA UT	15	2.44	0.00	0.00	4.89	6.67	63.18	46.67	31.93	46.67	0.38	0.00	0.00	0.38	0.46	

* Based on 2010 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		Geography: UTAH					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Salt Lake City MSA 41620	59	52.68	0.20	0.00	16.53	8.47	52.75	47.46	30.52	44.07	1.77	0.00	0.00	1.31	3.07	
Limited Review:																
Logan MSA 30860	3	2.68	0.31	0.00	20.62	0.00	42.42	66.67	36.65	33.33	0.00	0.00	0.00	0.00	0.00	
Ogden-Clearfield AA 36260	29	25.89	0.85	3.45	13.75	3.45	58.75	55.17	26.65	37.93	0.85	0.00	0.00	0.75	1.37	
Provo- Orem AA 39340	16	14.29	1.44	0.00	11.29	0.00	53.20	56.25	34.07	43.75	0.51	0.00	0.00	0.50	0.61	
Non-MSA UT	5	4.46	0.00	0.00	4.89	0.00	63.18	60.00	31.93	40.00	0.79	0.00	0.00	1.35	0.00	

* Based on 2010 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			Geography: UTAH				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Salt Lake City MSA 41620	485	55.30	0.20	0.00	16.53	7.84	52.75	51.34	30.52	40.82	0.33	0.00	0.14	0.29	0.44	
Limited Review:																
Logan MSA 30860	32	3.65	0.31	0.00	20.62	15.63	42.42	43.75	36.65	40.63	0.28	0.00	0.32	0.07	0.45	
Ogden-Clearfield AA 36260	237	27.02	0.85	0.42	13.75	9.28	58.75	56.12	26.65	34.18	0.29	0.00	0.25	0.25	0.40	
Provo- Orem AA 39340	96	10.95	1.44	0.00	11.29	6.25	53.20	54.17	34.07	39.58	0.14	0.00	0.34	0.13	0.14	
Non-MSA UT	27	3.08	0.00	0.00	4.89	11.11	63.18	70.37	31.93	18.52	0.35	0.00	0.00	0.52	0.11	

* Based on 2010 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: UTAH					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:																
Salt Lake City MSA 41620	0	0.00	3.14	0.00	49.56	0.00	36.55	0.00	10.76	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Logan MSA 30860	0	0.00	25.11	0.00	67.14	0.00	5.77	0.00	1.98	0.00	0.00	0.00	0.00	0.00	0.00	
Ogden-Clearfield AA 36260	1	100.00	10.10	0.00	37.79	100.00	42.96	0.00	9.15	0.00	0.00	0.00	0.00	0.00	0.00	
Provo- Orem AA 39340	0	0.00	37.58	0.00	29.83	0.00	28.47	0.00	4.12	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA UT	0	0.00	0.00	0.00	14.55	0.00	65.68	0.00	19.77	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 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		Geography: UTAH					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
Full Review:																
Salt Lake City MSA 41620	499	57.89	5.35	14.63	17.51	21.84	42.21	37.68	34.93	25.85	0.54	1.33	0.59	0.40	0.58	
Limited Review:																
Logan MSA 30860	29	3.36	1.32	0.00	28.22	37.93	36.27	48.28	34.20	13.79	0.51	0.00	1.19	0.53	0.00	
Ogden –Clearfield AA 36260	228	26.45	3.71	7.02	13.87	44.74	53.12	31.14	29.31	17.11	0.97	0.67	3.28	0.62	0.64	
Provo- Orem AA 39340	80	9.28	2.62	1.25	10.00	3.75	48.65	51.25	38.71	43.75	0.21	0.59	0.14	0.14	0.33	
Non-MSA UT	26	3.02	0.00	0.00	7.67	0.00	61.04	84.62	31.30	15.38	0.41	0.00	0.00	0.57	0.40	

* Based on 2010 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: UTAH															
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011															
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:															
Salt Lake City MSA 41620	39	48.15	2.36	0.00	14.13	5.13	48.63	94.87	34.88	0.00	8.04	0.00	9.09	13.56	0.00
Limited Review:															
Logan MSA 30860	1	1.23	0.00	0.00	12.70	0.00	56.97	100.00	30.33	0.00	0.00	0.00	0.00	0.00	0.00
Ogden-Clearfield AA 36260	1	1.23	2.53	0.00	10.54	0.00	60.10	0.00	26.83	100.00	0.00	0.00	0.00	0.00	0.00
Provo- Orem AA 39340	0	0.00	0.85	0.00	7.27	0.00	58.17	0.00	33.71	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA UT	40	49.38	0.00	0.00	1.50	0.00	65.17	62.50	33.33	37.50	4.91	0.00	0.00	4.60	7.27

* Based on 2010 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															Geography: UTAH					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Salt Lake City MSA 41620	299	48.54	16.76	7.36	19.97	45.15	24.84	17.06	38.44	30.43	0.44	0.30	0.68	0.26	0.41									
Limited Review:																								
Logan MSA 30860	18	2.92	17.17	11.11	20.15	16.67	23.47	27.78	39.21	44.44	0.25	0.53	0.39	0.22	0.00									
Ogden-Clearfield AA 36260	171	27.76	15.96	9.94	20.32	42.69	25.67	14.62	38.05	32.75	0.55	0.44	0.83	0.42	0.37									
Provo- Orem AA 39340	113	18.34	17.70	4.42	19.40	29.20	24.45	25.66	38.45	40.71	0.26	0.35	0.20	0.17	0.41									
Non-MSA UT	15	2.44	13.69	6.67	16.82	26.67	23.66	40.00	45.83	26.67	0.40	1.06	0.25	0.23	0.64									

* Based on 2010 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. 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		Geography: UTAH					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Salt Lake City MSA 41620	59	52.68	16.76	0.00	19.97	20.34	24.84	22.03	38.44	57.63	1.87	0.00	0.83	1.79	3.03	
Limited Review:																
Logan MSA 30860	3	2.68	17.17	0.00	20.15	0.00	23.47	0.00	39.21	100.00	0.00	0.00	0.00	0.00	0.00	
Ogden –Clearfield AA 36260	29	25.89	15.96	3.57	20.32	21.43	25.67	25.00	38.05	50.00	0.78	0.00	1.26	0.61	0.78	
Provo -Orem AA 39340	16	14.29	17.70	0.00	19.40	18.75	24.45	12.50	38.45	68.75	0.55	0.00	0.00	0.93	0.65	
Non-MSA UT	5	4.46	13.69	0.00	16.82	0.00	23.66	40.00	45.83	60.00	0.81	0.00	0.00	3.23	0.00	

* Based on 2010 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 0.9% of loans originated and purchased by bank. 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			Geography: UTAH				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Salt Lake City MSA 41620	485	55.30	16.76	4.23	19.97	20.93	24.84	27.48	38.44	47.36	0.45	0.31	0.36	0.38	0.57	
Limited Review:																
Logan MSA 30860	32	3.65	17.17	0.00	20.15	38.71	23.47	29.03	39.21	32.26	0.35	0.00	0.53	0.32	0.32	
Ogden-Clearfield AA 36260	237	27.02	15.96	7.23	20.32	18.72	25.67	25.11	38.05	48.94	0.40	0.69	0.37	0.20	0.53	
Provo- Orem AA 39340	96	10.95	17.70	3.30	19.40	12.09	24.45	26.37	38.45	58.24	0.21	0.00	0.21	0.19	0.25	
Non-MSA UT	27	3.08	13.69	3.85	16.82	23.08	23.66	30.77	45.83	42.31	0.45	1.52	0.00	0.38	0.57	

* Based on 2010 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 2.4% of loans originated and purchased by bank. 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									
Geography: UTAH									
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Salt Lake City MSA 41620	499	57.89	70.32	49.10	49.10	15.43	35.47	0.54	0.64
Limited Review:									
Logan MSA 30860	29	3.36	71.71	65.52	65.52	24.14	10.34	0.51	0.90
Ogden -Clearfield AA 36260	228	26.45	72.10	38.60	65.79	12.72	21.49	0.97	0.91
Provo -Orem AA 39340	80	9.28	72.23	62.50	60.00	15.00	25.00	0.21	0.39
Non-MSA UT	26	3.02	68.21	76.92	96.15	0.00	3.85	0.41	0.98

* Based on 2010 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 9.28% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: UTAH			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Salt Lake City MSA 41620	39	48.15	96.67	92.31	76.92	10.26	12.82	8.04	8.14
Limited Review:									
Logan MSA 30860	1	1.23	98.16	100.00	100.00	0.00	0.00	0.00	0.00
Ogden-Clearfield AA 36260	1	1.23	97.82	100.00	100.00	0.00	0.00	0.00	0.00
Provo- Orem AA 39340	0	0.00	97.26	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA UT	40	49.38	97.01	90.00	72.50	17.50	10.00	4.91	5.52

* Based on 2010 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 2.47% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: UTAH									
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Salt Lake City MSA 41620	12	18,121	33	14,002	45	32,123	55.47	1	135
Limited Review:									
Logan MSA 30860	0	0	1	8,395	1	8,395	14.50	0	0
Ogden-Clearfield AA 36260	2	6,678	0	0	2	6,678	11.53	0	0
Provo-Orem MSA 39340	0	0	1	10	1	10	0.02	0	0
Non-MSA Utah	1	83	2	10,221	3	10,304	17.80	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	1	393	0	0	1	393	0.68	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: UTAH																	
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# 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:																	
Salt Lake City MSA 41620	82.67	23	57.50	13.04	17.39	52.17	17.39	2	1	1	- 1	1	0	0.79	22.59	49.65	26.97
Limited Review:																	
Logan MSA 30860	1.35	1	2.50	0.00	100.00	0.00	0.00	0	0	0	0	0	0	4.30	32.60	35.15	27.95
Ogden-Clearfield AA 36260	9.71	9	22.50	11.11	44.44	44.44	0.00	0	0	0	0	0	0	2.33	17.15	55.26	25.26
Provo- Orem AA 39340	2.48	3	7.50	0.00	33.33	66.67	0.00	0	0	0	0	0	0	9.06	14.93	47.32	28.54
Non-MSA UT	3.78	4	10.00	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	5.66	62.60	31.74

Table 1. Lending Volume

LENDING VOLUME												
Geography: VERMONT												
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:												
Burlington- South Burlington AA 15540	58.85	283	54,653	149	34,439	0	0	17	186,367	449	275,459	79.60
Limited Review:												
Non-MSA VT	41.15	244	38,750	69	6,805	0	0	1	650	314	46,205	20.40

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: VERMONT					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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 Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Over all	Low	Mod	Mid	Upp									
Full Review:																								
Burlington -South Burlington AA 15540	98	62.82	0.39	1.02	9.35	6.12	59.20	59.18	31.06	33.67	0.84	0.00	0.00	1.06	0.68									
Limited Review:																								
Non-MSA VT	58	37.18	0.00	0.00	4.45	3.45	82.36	82.76	13.19	13.79	1.04	0.00	1.59	1.02	1.00									

* Based on 2010 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		Geography: VERMONT					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Burlington- South Burlington AA 15540	11	64.71	0.39	0.00	9.35	27.27	59.20	54.55	31.06	18.18	0.91	0.00	0.00	1.05	0.85	
Limited Review:																
Non-MSA VT	6	35.29	0.00	0.00	4.45	0.00	82.36	66.67	13.19	33.33	0.30	0.00	0.00	0.20	0.65	

* Based on 2010 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			Geography: VERMONT				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Burlington- South Burlington AA 15540	174	49.15	0.39	0.57	9.35	6.90	59.20	54.60	31.06	37.93	0.78	0.00	0.88	0.83	0.70	
Limited Review:																
Non-MSA VT	180	50.85	0.00	0.00	4.45	7.22	82.36	85.00	13.19	7.78	1.17	0.00	2.63	1.27	0.56	

* Based on 2010 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: VERMONT				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011				
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	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Burlington- South Burlington AA 15540	149	68.35	1.52	0.67	15.24	16.11	52.78	44.97	30.45	38.26	1.20	2.70	1.43	0.90	1.56					
Limited Review:																				
Non-MSA VT	69	31.65	0.00	0.00	6.80	10.14	78.83	73.91	14.37	15.94	0.23	0.00	0.00	0.27	0.19					

* Based on 2010 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 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: VERMONT					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Burlington- South Burlington AA 15540	98	62.82	17.35	8.16	19.34	25.51	24.71	26.53	38.60	39.80	0.95	1.80	0.44	0.93	1.19	
Limited Review:																
Non-MSA VT	58	37.18	16.45	5.17	18.50	20.69	24.92	36.21	40.13	37.93	1.18	0.00	1.03	1.76	0.99	

* Based on 2010 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. 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		Geography: VERMONT					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Burlington- South Burlington AA 15540	11	64.71	17.35	9.09	19.34	27.27	24.71	18.18	38.60	45.45	0.93	1.92	0.61	0.89	0.97	
Limited Review:																
Non-MSA VT	6	35.29	16.45	33.33	18.50	16.67	24.92	0.00	40.13	50.00	0.31	2.38	0.88	0.00	0.00	

* Based on 2010 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. 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																
Geography: VERMONT																
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid
Full Review:																
Burlington- South Burlington AA 15540	174	49.15	17.35	9.47	19.34	20.71	24.71	27.81	38.60	42.01	0.86	1.67	0.79	0.87	0.80	
Limited Review:																
Non-MSA VT	180	50.85	16.45	4.47	18.50	19.55	24.92	30.73	40.13	45.25	1.34	1.03	1.44	1.73	1.15	

* Based on 2010 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 1.7% of loans originated and purchased by bank. 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		Geography: VERMONT			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 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:									
Burlington -South Burlington AA 15540	149	68.35	67.57	46.31	55.03	18.79	26.17	1.20	1.60
Limited Review:									
Non-MSA VT	69	31.65	69.08	68.12	71.01	20.29	8.70	0.23	0.39

* Based on 2010 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 9.17% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: VERMONT									
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Burlington-South Burlington AA 15540	8	3,978	8	10,022	16	14,001	70.26	0	0
Limited Review:									
Non-MSA VT	12	5,725	0	0	12	5,725	28.73	0	0
Statewide Qualified Investments with potential benefit to one or more AAs	2	200	0	0	2	200	1.01	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: VERMONT																	
Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch s	% of Rated Area Branch s in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# 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:																	
Burlington- South Burlington AA 15540	79.63	9	69.23	0.00	22.22	55.56	22.22	0	0	0	0	0	0	1.56	12.15	59.14	27.15
Limited Review:																	
Non-MSA VT	20.37	4	30.77	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	6.12	81.96	11.92

Table 1. Lending Volume

ADDITIONAL CD LOAN ACTIVITY												Geography: REGIONAL AREA *		Evaluation Period: July 31, 2008 TO JUNE 30, 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:															
CD loans in regional area with no potential benefit to one or more AAs									17	34,608					

* Loan Data as of June 30, 2011. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Community Development Loans is from July 01, 2008 to September 30, 2011.
 *** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: REGIONAL Area				Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Qualified Investments located in the regional area with potential benefit to one or more AAs	319	40,857	3	5,000	332	45,857	100.00	3	2,021

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: REGIONAL Area				Evaluation Period: JULY 1, 2008 TO SEPTEMBER 30, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Qualified Investments located in the regional area with no potential benefit to one or more AAs	2	660	1	507	3	1,167	100.00	1	1,992

* '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.