



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## PUBLIC DISCLOSURE

July 1, 2008

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

KeyBank, N.A.  
Charter Number: 14761

127 Public Square  
Cleveland, Ohio 44114

Office of the Comptroller of the Currency

Large Bank Division  
250 E Street, SW  
Washington, D.C. 20219

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

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## Overall CRA Rating

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

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

Performance Levels	KeyBank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
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. The bank has a strong record of lending to the low- and moderate-income segments of the bank’s local communities. The substantial volume of community development loans and their responsiveness to identified needs in the bank’s assessment areas are major factors contributing to the bank’s overall outstanding lending record.

- Key’s excellent community development lending record is the principal reason for Outstanding Lending Test ratings assigned to 12 of the bank’s 15 rated areas.
- The bank also made 249 community development loans totaling \$129.9 million to national funds, projects, and organizations. While these loans are not attributed to specific assessment areas, they address needs of the broader regional areas where the bank operates.
- In primary rating areas the geographic distribution of loans is excellent and the borrower distribution of loans is good. The bank’s performance is good to excellent in a significant portion of the remaining ten states and two MultiState Metropolitan Areas.

Key’s overall level of qualified investments is excellent in primary rating areas. The level of investments was also excellent in eight of the twelve remaining rating areas. Performance was good in one rating area and poor in one area.

- The bank maintained an excellent level of current period investments within its assessment areas. In addition to investments within the bank’s assessment areas, Key made new investments within its broader statewide footprint areas totaling \$59.5 million that have the potential to impact one or more of the bank’s assessment areas. This current period level of investments is considered excellent given that Key was near its investment authority limit for much of the evaluation period.

- In addition, the bank had \$153.3 million in investments in the current and prior periods to national funds, projects, and organizations. These investments could not be attributed to a specific assessment area; however, the recipient organizations develop projects and provide services within the bank's assessment areas and broader regional areas. These investments demonstrate a positive commitment to community development efforts through out the nation. Please refer to Table 14, Additional Qualified Investments in Appendix D for facts and data regarding these investments.

The bank's performance under the Service Test in primary rating areas from which it derives the majority of its deposits is excellent.

- The bank's performance under the Service Test in primary rating areas is excellent in the states of New York and Washington and good in the State of Ohio. Performance is excellent in Key's primary rating areas and in a significant portion of the remaining ten states and two MultiState Metropolitan Areas.
- The accessibility of the bank's branches to residents in low-and moderate-income geographies is the main factor contributing to the overall Outstanding Service Test rating. The distribution of Key's branches within primary rating areas is excellent, and good to excellent in 11 of 15 rating areas overall.
- Overall, community development services provided by the bank are good to excellent in a significant portion of rating areas. Key employees hold leadership positions in many organizations in several of their AAs, including board and committee memberships of community development organizations that address the community's needs including economic revitalization, affordable housing, and services for low-and moderate-income individuals and families.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan.

This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

KeyBank National Association (Key) is the banking division of KeyCorp and is headquartered in Cleveland, Ohio. As of June 30, 2008, Key had assets of \$98 billion. KeyCorp was the twentieth largest commercial bank holding company with \$102 billion in assets. The company was founded in 1849 and is headquartered in Cleveland, Ohio. Key provides various banking services to individual, corporate, and institutional clients in the United States. As of December 31, 2007, it operated 955 full-service retail banking branches in 14 states and 1,443 automated teller machines. Key's retail footprint includes branches in Alaska, Colorado, Connecticut, Florida, Idaho, Indiana, Maine, Michigan, New York, Ohio, Oregon, Utah, Vermont, and Washington. Key's most significant presences are in New York, Ohio and Washington.

The bank primarily engages in generating deposits and originating loans. The company's deposit products include NOW accounts, money market deposit accounts, savings deposits, checking deposits, certificates of deposit, and other time deposits. The company's loan portfolio comprises commercial, financial, and agricultural loans; commercial real estate loans; commercial leases; residential real estate loans; and consumer loans, such as home equity loans and automobile loans. KeyCorp also provides personal and corporate trust services, personal financial services, access to mutual funds, cash management services, investment banking and capital markets products, international banking services, and investment management services. In addition, the company offers accident, health, and credit-life insurance on loans made by its subsidiary bank; principal investing; community development financing; securities underwriting and brokerage; and merchant services.

The company's strategic focus is relationship banking with an emphasis on corporate and investment banking. Over the past five years, Key has continued to strategically shift its focus towards corporate banking. It has deemphasized indirect or non-footprint consumer activities with the divestitures of indirect auto lending and leasing, nonprime mortgage banking, and home improvement lending. The portfolio mix now consists of approximately 75 percent commercial and 25 percent consumer loans, compared to approximately 60 percent and 40 percent respectively in the last evaluation period. Key's consumer banking portfolio is comprised of \$21 billion in booked assets, with home equity loans comprising approximately 50 percent of total consumer assets. Recreation and Education lending portfolios are also relatively sizable business lines. Additional product offerings have included direct auto, marine and RV, unsecured credit lines, and purchase money mortgages.

Key's investment strategy has been to focus most of its investments toward affordable housing, primarily using Low Income Housing Tax Credits. During the evaluation period, Key made efforts to diversify its investments into other areas such as New Markets Tax Credits, Business Equity Investments (BEI) in Small Business Investment Company (SBIC) funds to promote economic growth, and Real Estate Equity Investments (REEI) in specific projects such as retail center rejuvenations and affordable for-sale housing.

During the evaluation period, significant merger and organizational changes occurred within KeyCorp which impacted the activities considered in our evaluation. In July 2004, Key acquired branches from Sterling Bank and Trust FSB (Southfield, MI). In October 2004, KeyBank USA National Association (KBUSA), its consumer finance affiliate, was merged into KeyBank National Association. A significant portion of KBUSA's lending activity occurred outside of Key's assessment areas through its Champion Mortgage, Key Home Equity (KHE), and Key Home Improvement (KHI) lines of business. In December 2005, KeyBank acquired Key Community Development Corporation from KeyCorp. The subsidiary makes community development loans and investments in addition to those made by the bank. During 2007, Key sold Champion Mortgage and discontinued KHE and KHI operations. Also in 2007, KeyCorp purchased and merged EverTrust Bank (Everette, WA) into Key. In January 2008, the bank completed its merger of Union State Bank (Orangeburg, NY) into Key.

To determine Key's size and capacity for CRA evaluation purposes, we considered operating subsidiaries of the bank. Only one of Key's operating subsidiaries, Key Community Development Corporation, contributes to the bank's CRA performance. As previously mentioned, the subsidiary makes community development loans and investments in addition to those made by the bank. There are no significant financial, legal or other types of barriers limiting Key's ability to lend or provide services in its communities. Key's record of investing in its communities is strong; however, during the evaluation period the bank's ability to make additional community development investments was limited by its regulatory limit for public welfare investments. All national banks are subject to these limitations. As of June 30, 2008, Key had Tier 1 capital of approximately \$7 billion.

The last CRA examination is dated September 1, 2003. The bank received an "outstanding" rating at that review.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses the bank reported under the Community Reinvestment Act. The evaluation period for home mortgage loans and small loans to businesses was January 1, 2003 through December 31, 2007. In 2003 and 2004 Office of Management and Budget (OMB) provided revised MSA boundaries and definitions. These revisions changed the boundaries of many existing MSAs, created new MSAs and some new types of statistical areas including Metropolitan Divisions (MDs). Due to these changes and the length of the evaluation period, we analyzed the bank's 2003 HMDA and small loans to businesses separately from other years. Overall, the 2003 performance was not materially dissimilar to 2004-2007 performance nor did it have a significant impact on the bank's overall rating or conclusions in any rating area. As such, discussion of 2003 performance is not included within this presentation. We analyzed community development loans, qualified investments and community development services from September 1, 2003 (the date of the last evaluation), through June 30, 2008. While the bank makes some agricultural and multi-family property loans, in most assessment areas, these loan types represent a very small percentage of the bank's lending activity and had volumes too small for meaningful analyses. Regardless, information regarding the number and volume of these loans is presented in the corresponding tables found in Appendix D for each rating area. Key's acquisition of Union State Bank was completed in January 2008. The acquisition included a single branch in the State of Connecticut, which is Key's only branch presence in that state. Since the acquisition was completed after the evaluation period for home mortgage loans and small loans to businesses, a rating for the State of Connecticut was not included for this evaluation period.

### **Data Integrity**

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of community development activities provided for consideration in our evaluation. This included testing of community development loans, investments, and services for accuracy and to determine if they qualify as community development. We determined that the data reported publicly and the additional data provided for this evaluation are accurate.

### **Selection of Areas for Full-Scope Review**

We selected at least one assessment area (AA) in each state where the bank has an office for a full-scope review. In addition, the bank's performance within both of the Multistate Metropolitan Areas the bank operates in was reviewed using full-scope procedures. Full-scope reviews consider performance

context, quantitative and qualitative factors. In general, the AAs selected for the full-scope review have the largest percentage of Key's deposits in that state. However, in the states of Florida and Michigan we selected areas not only based on percentage of Key's deposits in those states, but also on other factors such as percentage of loans. The other AAs in each state were analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only. Each of the states, with the exception of Florida, had non-urban communities in which Key has an office. In each state, these non-urban communities were aggregated as one for analytical purposes. Refer to the "Description of the Institution's Operations" section under each State Rating for details regarding how the areas were selected.

## **Ratings**

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings. Three of the rated areas ("Primary Rating Areas") carried the greatest weight in our conclusions because they represent the bank's most significant markets in terms of deposit concentrations, as well as lending, investment, and service activity. In order of significance, these areas are the State of Ohio (30.0 percent of deposits), the State of New York (22.8 percent) and the State of Washington (13.9 percent). Together these three states contain over 66 percent of the bank's total deposits, 55 percent of reported loans, 57 percent of qualified investments, and 62 percent of Key's branches.

The state ratings are based primarily on those areas that received full-scope reviews, but proportional consideration is given to the bank's performance in areas receiving limited-scope reviews. Refer to the "Conclusions for Areas Receiving Limited-Scope Reviews" section under each test in each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

## **Fair Lending or Other Illegal Credit Practices Review**

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

## **Community Contacts**

We reviewed information from contacts made during the evaluation period with a variety of groups and organizations to identify financial and credit needs and opportunities within Key's assessment areas. Of the 54 contacts made, 31 interviews were conducted specifically for this evaluation in full-scope assessment areas in during 2007 and 2008. Interviews were conducted with low-income housing specialists, community and economic development organizations, community action groups, small business development organizations, social service groups, realtors, and other business leaders. Relevant comments were 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**

### ***Lending Gap Analysis***

We reviewed summary reports and analyzed Key's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. We determined that all of the bank's AAs consist of whole geographies, meet the requirements of the Community Reinvestment Act regulation, and do not arbitrarily exclude any low- or moderate-income areas.

### ***Inside/Outside Ratio***

A majority of originated and purchased loans reported by Key during the evaluation period are within the bank's AAs. Fifty-six percent of the number of loans and 72 percent of loan dollars are located within the bank's AAs. A substantial majority of small business/farm (94 percent) and home purchase (88 percent) lending was done within the AAs, while 28 percent of home improvement and 60 percent of home refinance lending occurred within those areas. The percentages of home improvement and home refinance loans are lower due to national lending programs. Nearly all CD loans were done within the AAs. These calculations are done on a bank-wide basis, and affiliate lending is not included. This record of lending within the AAs did not significantly impact geographic distribution conclusions.

### ***Flexible and Innovative Loan Programs and Services***

#### Lending

Key has developed some flexible and innovative lending solutions to meet the needs of its communities. For instance, through innovative financing techniques, Key was able to leverage some of the bank's \$350 million in allocated New Markets Tax Credits, oftentimes coupled with Low-Income Housing Tax Credit (LIHTC) projects in order to produce more competitive loan structures and rates for developers of community development projects.

Key has also addresses the credit needs of low- and moderate-income (LMI) families and LMI geographies through various traditional lending products as well as those that have flexible terms or may be more complex due to the interaction required with local or state agencies. Examples where Key has created loan products in response to community credit needs or participated with other agencies to provide flexible financing include:

- The bank's primary mortgage loan program to help LMI borrowers achieve homeownership is the HomeAssist Product. HomeAssist is targeted to LMI families and LMI geographies. It enables the borrower to purchase a home with 3 percent down, which may be obtained as a gift. Flexible underwriting guidelines are used in order to accommodate as many borrowers as possible. In addition, the product does not require borrowers to obtain Private Mortgage Insurance (PMI), so the bank carries these loans in its own portfolio. In addition to the flexible lending terms, these borrowers are provided with homebuyer counseling as part of the home purchase process.
- The bank participates in the Federal Home Loan Bank's (FHLB) Welcome Home Program which sets aside grant funds (maximum of \$5,000 per homebuyer) that may be used by members to fund reasonable down payments and costs incurred in conjunction with the purchase of owner-occupied housing by low- and moderate-income homebuyers. From 2005-2007, 74 homebuyers received \$327 thousand in grant funds.
- In addition to Home Assist and Welcome Home, the bank provides several other mortgage products for the LMI market. These include loans through the Rural Housing Agencies and programs through the State Housing Agencies of Maine, New York, Oregon, Idaho, Colorado, Vermont, and Washington. In specific markets the bank has established special home purchase or repair programs with non-profits or local governments.

While these programs demonstrate Key's commitment to providing flexible and innovative products, the volume of loans generated by these programs is not substantial. We considered these activities as positive factors where appropriate while evaluating the bank's overall lending performance, but overall impact to Lending Test ratings was neutral.

## Services

Key demonstrates its commitment to community development through participation in various service programs. One example is the bank sponsored Super Refund Saturday events in several of its markets throughout the evaluation period. During these events, Key helped raise awareness of Earned Income Tax Credit (EITC) qualification. The EITC is a federal program that provides a refundable tax credit to individuals earning less than approximately \$40,000 per year. Depending on family size, these individuals can receive a tax refund of up to \$4,716. Many eligible individuals and families do not claim the EITC, leaving hundreds of millions of EITC dollars unclaimed each year. The bank collaborated with non-profit organizations to publicize the EITC and offered free tax preparation, primarily to LMI individuals in low- and moderate-income areas. Bank employees provided expertise through their participation in the tax preparation process. For 2008, the event resulted in the preparation of one hundred sixty-eight (168) tax returns representing \$433 thousand in tax refunds.

In addition to traditional branches and ATMs, customers may access bank services through a toll-free telephone number. Customers also have 24-hour access to bank services including the ability to apply for financial products. We did not place significant weight on these alternative delivery systems when drawing conclusions for the Service Test as no data was available describing how LMI individuals and geographies are affected by these services.

Examples of flexible and or innovative loans, investments, and/or services are discussed throughout the narrative portions of the lending, investment, and services tests in each rating area, where appropriate, and particularly when they resulted in a positive impact to an overall rating area.

### ***Factors Considered in our Analysis Under the Performance Tests***

Lending Test - We considered the bank's home mortgage and small business lending in determining lending performance. When drawing conclusions for geographic and borrower distribution analyses in each AA, loan products were weighted according to their relative volume within that AA. This approach provided consideration to the bank's varied activity levels within the individual AAs. Geographic and borrower distribution analyses were generally given equal weight, with community development activity given significant consideration as the bank made an exceptional volume of these loans. Additional consideration was given to CD lending activity outside of AAs but within the statewide rating area that included the bank's AAs. Community development lending to national funds, projects, and organizations outside of the bank's AAs and state-wide areas, but within the broader regional area was not considered when drawing rating area conclusions, but was considered when drawing overall Lending Test conclusions at the bank level.

Investment Test – During the evaluation period Key was at or near its regulatory limit for community welfare investments somewhat limiting the bank's ability to make future investments until outstanding investments mature. We therefore gave equal consideration to the volume of investments and grants made in the current evaluation period and the qualified investments that had outstanding balances on the bank's books from the prior evaluation period. Additional, but lesser consideration was given to investments made by the bank in state-wide or national funds within the state or broader regional area that includes the bank's AAs but not located within the bank's AAs provided that the bank provided an adequate level of investments in its AAs. Bank management stated the opportunity to make qualified investments in the State of Idaho is low due to the limited amount of Low Income Housing Tax Credits available for affordable housing development and the small number of developers with access to those credits who have primary banking relationships with other lenders

We evaluated the responsiveness of those investments to the community's identified needs. We also compared the dollar volume of qualified investments in each AA to the dollar volume of Tier I capital allocated to that AA to gauge the level of qualified investments on an AA, state-wide and bank basis.

Service Test - We gave primary consideration to Key's performance in ensuring that low- and moderate-income people and areas had reasonable access to the bank's branches and ATMs. We evaluated the impact of branch openings and closings on accessibility for low- and moderate-income people and areas. We also considered the range of products and services and the convenience of business hours in low- and moderate-income areas compared to those in middle- and upper-income areas to determine if there were differences. We also evaluated the impact of community development services provided by the bank.

## State of Ohio

<b>CRA Rating for Ohio:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- The geographic distribution of Key's home mortgage and small business lending is excellent.
- The borrower distribution of Key's lending is good.
- An excellent level of community development lending activity had a positive impact on the Lending Test rating for Ohio.
- Excellent Investment Test performance was the result of a good volume of investments in the Cleveland AA, stronger overall performance in a majority of limited-scope AAs, as well as the innovativeness the investments and their responsiveness to community development needs.
- The bank's distribution of branch deposit facilities is overall good. The branch distribution in low-income geographies is excellent and is good in moderate-income geographies. The bank's record of providing community development services is excellent.

## Description of Institution's Operations in Ohio

Key operates 211 branches and 318 deposit-taking ATMs in the State of Ohio. These branches represent 20.8 percent of the bank's total branch network. The bank's assessment areas in the state include ten MSAs or portions of MSAs and six entire counties that comprise the combined non-metropolitan assessment area. The Cleveland MSA was selected for full-scope review due to its high concentration of deposits (61.5 percent), reported loans (34.4 percent), and branches (32.2 percent) within the state. The concentration of deposits in the Cleveland MSA far exceeds the Toledo MSA which is the next largest assessment area in terms of deposits with 8.5 percent of Key's deposits in the state. The remaining assessment areas, including the combined non-metropolitan areas, were analyzed using limited-scope procedures. Deposits in Ohio represent 30 percent of the bank's total deposits. Ranked by deposits, the Ohio rating area is the largest rating area for Key. As such, performance in this rating area had a significant impact on the bank's overall CRA rating.

Refer to the market profiles for the state of Ohio in appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Ohio is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Cleveland AA is excellent.

### Lending Activity

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

Key's lending activity is adequate in the Cleveland AA, especially considering the strong level of competition in the market and the bank's strong level of CD loans. As of June 30, 2007, Key ranked second in deposits among 42 depository institutions with a 17 percent share of the market. But, with over 400 lenders operating in the AA, the majority of which are not depository institutions, Key's lending market shares are lower than its deposit share.

Our lending analyses focused on small business and home improvement lending as those are Key's primary product lines in the Cleveland AA. No analyses of multifamily and small farm lending were performed due to Key's low activity levels for these loan types.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is excellent in Ohio based on both home mortgage and small business lending.

#### ***Home Mortgage Loans***

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

The geographic distribution of home purchase, home improvement, and home refinance loans is excellent in the Cleveland AA. The percentages of Key's loans in both low-income and moderate-income geographies significantly exceed the percentages of owner-occupied housing units that are located in those segments of the AA for home purchase and home improvement loans. For home refinance loans, the percentage of loans in low-income areas exceeds the demographic, and is very near the demographic in moderate-income areas. In addition, Key's 2006 market share of home improvement loans in low-income and moderate-income areas exceeded its overall home improvement market share in the AA. Key's market shares of home purchase and home refinance loans were too small in 2006 for meaningful analyses. These products do not represent a significant portion of Key's overall lending strategy.

#### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is excellent in the Cleveland AA. The percentages of Key's loans in both low-income and moderate-income geographies exceed the percentages of businesses located in those segments of the AA. Key's 2006 market shares in low-income and moderate-income areas also exceeded its overall small business market share in the AA.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in Ohio. This is based on good home improvement and small loans to business distribution records, coupled with excellent home purchase and home refinance records.

#### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the Market Profiles in appendix C for the demographic information, including poverty rates.

The distribution of home purchase and home refinance loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA for both product types. While the percentages of loans to low-income borrowers were lower than the percentage of low-income families in the area, consideration was given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's market shares of home purchase and home refinance loans were too small in 2006 for meaningful analyses.

The distribution of home improvement loans to borrowers of different income levels is good. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was lower than the percentage of low-income families in the area, consideration was given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's market shares in both low- and moderate-income areas were near to its overall home improvement market share in the AA.

### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is good in the Cleveland AA. The percentage of loans to businesses with revenues of \$1 million or less is below the percentage of small businesses within the AA. However, Key's market share of businesses with revenues of \$1 million or less significantly exceeds its overall share of small loans to businesses.

### **Community Development Lending**

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

Community development lending had a positive impact on the Lending Test rating for Ohio. The bank's record of originating community development loans is excellent in the Cleveland AA. During the evaluation period Key generated 80 CD loans totaling \$234.9 million in the area. The CD loans reflect a variety of community development purposes such as affordable housing, activities that revitalize/stabilize low-and moderate-income geographies, and funding for organizations providing community services targeted to low-and moderate-income individuals and families. For example, Key originated a series of community development loans in conjunction with a housing organization that provides affordable housing using Low Income Housing Tax Credits. The organization was established to provide community development corporations access to capital for developing affordable housing in the City of Cleveland. Key also originated a series of loans for infrastructure development and improvements within a low-income geography where residential construction is planned. These efforts have helped to address affordable housing related needs as identified by community contacts.

### Additional CD Loan Activity

The bank made 12 additional CD loans totaling \$324.1 million within the State of Ohio but not located within any of the bank's AAs. These loans have the potential to benefit one or more of the bank's AAs. These additional CD loans did not impact the bank's overall performance under the Lending Test in Ohio.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Columbus, Dayton, Springfield, Youngstown and Non-MSA AAs is not inconsistent with the bank's overall outstanding performance under the Lending Test in Ohio. In the Akron, Canton, Mansfield, Sandusky, and Toledo AAs the bank's performance is weaker than the bank's overall performance in the state. In the Akron, Mansfield, Sandusky and Toledo AAs, performance is weaker due to weaker geographic lending distributions and lower relative levels of CD lending. The Canton AA's performance is weaker due to lower relative levels of CD lending. The results of the limited-scope reviews did not impact the bank's overall performance under the Lending Test in Ohio.

Refer to the Tables 1 through 12 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Ohio is rated "Outstanding." Based on a full-scope review, performance in the Cleveland AA is good. Investment performance in limited-scope areas, as well as the complexity of the investments designed to address affordable housing needs had a positive impact on the bank's overall investment performance in Ohio. Key's responsiveness to the identified needs of the AA is excellent, especially in the areas of affordable housing and activities that revitalize and stabilize low- and moderate-income geographies.

During the evaluation period, Key originated 310 investments and donations in the Cleveland AA totaling \$35.9 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on 111 prior period investments as of June 30, 2008 was \$25 million.

Key's investments are particularly responsive to Cleveland's affordable housing needs and activities that revitalize and stabilize low- and moderate- income geographies. For instance, Key's Community Development Corporation led a project involving rehabilitating an older, unoccupied 180,000 sq ft building in a low-income neighborhood. The project will turn this structure into 77 market rate rental housing and 26 extended stay units. The community will benefit the additional residents and their contribution to the local economy and the city's tax base. The construction phase of the project is projected to generate 90 jobs, and ongoing operations (maintenance, leasing and security) will create approximately 4-6 full time positions. Key demonstrated leadership and innovativeness as the various financing layers and leverage of NMTCs made the project particularly complex. Key coordinated the funding which consisted of a direct loan from the bank in the amount of \$1.4 million, a \$7.5 million equity investment from the bank as well as a \$7.5 million equity investment from another institution, \$15 million in NMTCs provided by the Cleveland Port Authority, and a \$750 thousand subordinate loan from another investor.

The bank also made investments in funds throughout the State of Ohio 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 made 66 statewide investments totaling \$21.9 million in the current evaluation period and 96 statewide investments with remaining balances of \$5.7 million in prior periods. These investments did not impact the overall Investment Test performance for the State of Ohio.

Refer to Table 14 in the State of Ohio section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the Akron, Columbus, Dayton, Mansfield, Springfield, Toledo, Youngstown, and non-metropolitan AAs is stronger than the bank's good level of performance in the Cleveland full-scope area. The bank's performance in the Canton and Sandusky AAs is weaker than the overall performance in the state, due to a lower level of investments. While weaker than the overall performance in the state, the bank's performance in the Canton AA was considered adequate. Performance in the limited-scope AAs had a positive impact on the State of Ohio Investment Test rating, due to the excellent performance in eight of ten of the limited-scope areas that represent 32 percent of state-wide deposits.

Refer to the Table 14 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Ohio is rated "High Satisfactory." Performance in the Cleveland AA is good.

### **Retail Banking Services**

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

The distribution of bank branches is good in the Cleveland AA, as they are accessible to all portions of the full-scope area. The percentage of bank 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 below the population percentage. During the evaluation period the bank opened and closed six branches resulting in once less branch located in a moderate-income geography. The branch closings did not significantly impact the accessibility of banking services in moderate-income Cleveland AA geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are convenient and include extended weekday and Saturday hours.

The bank designated 26 of its Cleveland AA branches as KeyBank Plus program branches that offer affordable check cashing for non-depository clients. In addition to fees that are well below those of check cashing companies, participants receive up to five free money orders per visit which facilitates bill payments.

## **Community Development Services**

The bank provided an excellent level of community development services to the Cleveland AA. Bank employees hold leadership positions in many organizations, including board and committee memberships of community development organizations that address the community's needs including economic revitalization, affordable housing, and services for low-and moderate-income individuals and families. During the evaluation period, bank employees, including senior bank officers, provided almost 9,600 hours of financial guidance to organizations serving the community development needs of low-and moderate-income residents and geographies within the Cleveland AA.

One of Key's more notable community service partnerships is with a local housing network that is comprised of 22 member organizations located throughout Cleveland. The organization provides affordable housing to low-and moderate-income Cleveland families through a lease- purchase program and through their "for sale" Rehab and New home purchase "Homeward Program." The organization also provides services to the low-and moderate-income individuals and families to assist in energy conservation, lead abatement, heater and electric system upgrades, financial and homebuyer education and foreclosure prevention services. The organization manages over 2,000 affordable housing units representing several LIHTC partnerships throughout Cleveland. A KeyBank officer serves on the Board and provides financial expertise in structuring projects.

Bank employees also provided technical assistance to the Cleveland community by submitting Affordable Housing Program applications to the Cincinnati Federal Home Loan Bank. Specifically, the bank assisted in filing nine applications which totaled \$5.3 million.

The bank sponsored Super Refund Saturday events in its Cleveland AA in 2005, 2006, 2007 and 2008 to facilitate access to the Earned Income Tax Credit (EITC). The bank collaborated with non-profit organizations to publicize the EITC and free tax preparation, primarily to low- and moderate-income individuals. Bank employees provided expertise through their participation in the tax preparation process. For 2008, the event resulted in the preparation of 168 tax returns representing \$433 thousand in tax refunds.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in the Akron, Mansfield, Springfield, and non-metropolitan AAs is stronger than the bank's overall High Satisfactory performance in the State of Ohio. The bank's performance in the Columbus, Toledo, and Sandusky AAs is not inconsistent with the bank's overall High Satisfactory performance in the State of Ohio. Performance in the Canton, Dayton, and Youngstown AAs is weaker than the bank's High Satisfactory rating primarily due to branches in low-and moderate-income geographies in these AAs being less accessible than the bank's branches in the full-scope area. The bank's performance in the limited-scope AAs did not impact the bank's overall performance under the Service Test in the State of Ohio.

## State of New York

<b>CRA Rating for New York:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- The geographic distribution of Key's lending is excellent in the Albany AA and good in the Buffalo AA.
- The borrower distribution of loans is good in both the Albany and Buffalo AAs.
- Community development lending activity has been substantial, and is excellent in both of the Albany and Buffalo AAs, as well as the majority of limited scope AAs. CD lending positively impacted the Lending Test rating for the state of New York overall.
- The volume of community development investments in both the Albany and Buffalo AAs is good. Performance in the limited-scope areas had a positive impact on the overall Investment Test rating for the State of New York.
- The bank's distribution of branch facilities in the Albany and Buffalo AAs is good. The bank's record of providing community development services in the Albany and Buffalo AAs is excellent. The bank's stronger distribution of branch facilities in the New York, Rochester, Syracuse, and non-metropolitan AAs had a positive impact on the overall Service Test rating.

## Description of Institution's Operations in New York

Key operates 232 branches and 282 deposit-taking ATMs in the State of New York. These branches represent 22.9 percent of the bank's total branch network. The bank's assessment areas in the state include nine MSAs or portions of MSAs and 19 entire counties that comprise the combined non-metropolitan assessment area. The Albany MSA was selected for full-scope review due to its high concentration of deposits (32.9 percent), reported loans (17.1 percent), branches (17.2 percent), and investments (13.2 percent) within the state. The Buffalo MSA was also selected for full-scope review due to its similar high concentration of deposits (21.9 percent), reported loans (19 percent), and branches (16 percent) within the state. The concentration of deposits in these two MSAs far exceeds the non-metropolitan assessment area which is the next largest assessment area in terms of deposits with 14.5 percent of Key's deposits in the state. The remaining assessment areas, including the combined non-metropolitan areas were analyzed using limited-scope procedures. Deposits in New York represent 22.8 percent of the bank's total deposits. Ranked by deposits, the New York rating area is the second largest rating area for Key. As such, performance in this rating area had a significant impact on the bank's overall CRA rating.

Refer to the market profiles for the state of New York in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in State of New York is rated Outstanding. Based on full-scope reviews, the bank's performance in the Albany and Buffalo AAs is excellent.

### Lending Activity

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

Key's lending activity is adequate in the Albany and Buffalo AAs, especially considering the strong level of competition in those markets. In Albany, Key ranks first in deposits among 24 depository institutions with a 23 percent share of the market according to June 30, 2007, FDIC deposit data. In Buffalo, Key ranks third among 20 depository institutions with eight percent of the market. But, with over 300 lenders operating in the Albany and more than 250 operating in Buffalo, the majority of which are not depository institutions, Key's lending market shares are lower than its deposit shares.

Key's primary lending products in Albany are small business and home improvement loans, although home purchase and home refinance loans are also actively originated. According to 2006 aggregate CRA data, Key is ranked 13<sup>th</sup> in volume of originated/purchased small business loans with a 1.6 percent market share. According to 2006 aggregate HMDA data, Key is ranked 9<sup>th</sup> with a 3.5 percent share for home improvement lending, 21<sup>st</sup> with a 1.4 percent share in home refinance lending, and 66<sup>th</sup> in home purchase lending with a market share of under one percent. The level of Key's multifamily and small farm loans is low. Therefore, no analyses were performed for these loan types.

Key's primary lending products in Buffalo are home improvement, home refinance, and small business loans, although home purchase loans are also actively originated. According to 2006 aggregate HMDA data, Key is ranked fourth in the origination/purchase of home improvement loans with a six percent share, and tenth in home refinance lending with a 2.5 percent share. For home purchase loans, Key is ranked 31<sup>st</sup> with a market share of under one percent. According to 2006 aggregate CRA data, Key is ranked 15<sup>th</sup> with a 1.1 percent share of the market. The level of Key's multifamily and small farm loans is low. Therefore, no analyses were performed for these loan types.

### Distribution of Loans by Income Level of the Geography

The geographic distribution of Key's loans is excellent in New York. This is primarily based on excellent performance in the Albany AA and good performance in the Buffalo AA.

### *Home Mortgage Loans*

Refer to Tables 2, 3, 4, and 5 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases. As the level of Key's multifamily lending is very low in both the Albany and Buffalo AAs, no analyses were performed for that loan type.

### Albany Assessment Area

The geographic distribution of home purchase and home refinance loans is excellent and the distribution of home improvement loans is good.

The percentage of Key's home purchase loans in both low-income and moderate-income geographies exceeds the percentages of owner-occupied housing units that are located in those segments of the AA. Key's market share of home purchase lending was too small in 2006 for meaningful analysis.

The percentage of Key's home refinance loans in low-income geographies is near the percentage of owner-occupied housing units in that portion of the AA, while the percentage of lending in moderate-income areas exceeds the demographic. Key's 2006 market share in low-income areas was below its overall home refinance market share in Albany, while its share in the moderate-income segments equaled its overall share.

The percentage of home improvement loans in low-income geographies is near the percentages of owner-occupied housing units that are located in those segments of the AA, while the percentage of loans in moderate-income areas exceeds the demographic. Key's 2006 low-income market share was well below its overall share of the home improvement market, while its share in moderate-income areas was below its overall share.

### Buffalo Assessment Area

The geographic distribution of home purchase loans is excellent, and the distribution of home improvement and home refinance loans is adequate.

The percentage of Key's home purchase loans in moderate-income geographies significantly exceeds the percentage of owner-occupied housing units that are located in those segments of the AA. The percentage of loans in low-income areas is near the demographic level. Key's market share of home purchase lending was too small in 2006 for meaningful analysis.

The percentage of Key's home refinance loans in moderate-income geographies is near the percentage of owner-occupied housing units in that portion of the AA, while the percentage of lending in low-income areas is well below the demographic. Key's 2006 market share in low-income areas was near its overall home refinance market share in Buffalo, while its share in the moderate-income segments was below its overall share.

The percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied housing units that are located in those segments of the AA, while the percentage of loans in low-income areas is well below the demographic. Key's 2006 low-income market share was below its overall share of the home improvement market, while its share in moderate-income areas exceeded its overall share.

### ***Small Loans to Businesses***

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

### Albany Assessment Area

The geographic distribution of small loans to businesses is excellent in the Albany AA. The percentage of Key's loans in both low-income and moderate-income geographies exceeds the percentages of businesses located in those segments of the AA. Key's 2006 market shares in low-income and moderate-income areas significantly exceeded its overall small business market share in the AA.

Buffalo Assessment Area

The geographic distribution of small loans to businesses is good in the Buffalo AA. The percentage of Key's loans in low-income geographies exceeds the percentage of businesses located in low-income segments of the AA, while the percentage of loans in moderate-income areas is near to the percentage of businesses located in those areas. Key's 2006 market share in low-income areas exceeds its overall small business market share in Buffalo, while its share in moderate-income areas significantly exceeds its overall share.

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

The borrower distribution of Key's loans is good in New York. This is based on good performance in both the Albany and Buffalo AAs.

***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the Market Profiles in appendix C for the demographic information, including poverty rates.

Albany Assessment Area

The borrower distribution of home purchase and home improvement loans is good and the distribution of home refinance loans is excellent.

The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's market shares of home purchase loans were too small in 2006 for meaningful analyses.

The percentage of home improvement loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home improvement market share to low-income borrowers was near its overall home improvement market share, and was below its overall share level to moderate-income borrowers.

The percentage of home refinance loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 market shares to both low-income and moderate-income borrowers significantly exceeded its overall home refinance market share in Albany.

Buffalo Assessment Area

The borrower distribution of home purchase and home refinance loans is excellent and the distribution of home improvement loans is good.

The percentage of home purchase loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The percentage of loans to low-income is near the percentage of low-income families in the area. Consideration is also given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's market shares of home purchase loans were too small in 2006 for meaningful analyses.

The percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home improvement market share to low-income borrowers was near its overall home improvement market share, and was below its overall share level to moderate-income borrowers.

The percentage of home refinance loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 market share to low-income borrowers significantly exceeded its overall home refinance market share in Buffalo, while its share to moderate-income borrowers exceeding its overall share.

***Small Loans to Businesses***

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

Albany Assessment Area

The borrower distribution of small loans to businesses is good in the Albany AA. The percentage of loans to businesses with revenues of \$1 million or less is below the percentage of small businesses within the AA. However, Key's market share of businesses with revenues of \$1 million or less significantly exceeds its overall share of small loans to businesses.

Buffalo Assessment Area

The borrower distribution of small loans to businesses is good in the Buffalo AA. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of small businesses within the AA. Key's market share of businesses with revenues of \$1 million or less significantly exceeds its overall share of small loans to businesses.

**Community Development Lending**

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

Community development lending activity is excellent in both the Albany and Buffalo AAs, and had a positive impact on the Lending Test rating in New York.

#### Albany Assessment Area

During the evaluation period Key generated 13 CD loans totaling \$144.9 million in the Albany area. The CD loans reflect a variety of community development purposes, including affordable housing activities that revitalize/stabilize low-and moderate-income geographies and funding for organizations providing community services targeted to low-and moderate-income individuals and families. For example, Key originated multiple community development loans to an organization that provides community development services targeted toward low- and moderate-income individuals. The organization is dedicated through its program to enhancing the quality of life for those living in poverty including adults with mental illness. Program enrollment and fees are based upon income qualifications.

#### Buffalo Assessment Area

During the evaluation period Key generated 85 CD loans totaling \$203.7 million in the area. The CD loans reflect a variety of community development purposes such as affordable housing and funding for organizations that provide community services targeted to low-and moderate-income individuals and families. For example, Key originated multiple community development loans to an affordable housing project using Low Income Housing Tax Credits. Homes are income restricted and targeted to low-and moderate-income women with or without children. A community contact identified affordable housing as a Buffalo AA community development need.

#### Additional CD Loan Activity

The bank made 32 additional CD loans totaling \$63.8 million within the State of New York but not located within any of the bank's AAs. While having the potential to benefit one or more of the bank's AAs, these additional CD loans did not impact the overall state rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the New York, Poughkeepsie, Rochester, Syracuse, and Utica, AAs is not inconsistent with the bank's overall Outstanding performance under the Lending Test in New York, as strong levels of CD lending raise the overall Lending Test conclusions in those areas. In the Glenn Falls, Kingston, and non-MSA New York AAs, the bank's performance is weaker than the bank's overall performance in the state. Performance is weaker due to weaker geographic lending distributions and lower relative levels of CD lending. The results of the limited-scope reviews did not impact the Lending Test rating for New York. Refer to the Tables 1 through 12 in the state of New York section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of New York is rated "Outstanding." Performance in both the Albany and Buffalo full-scope AAs is good. Stronger performance in limited-scope AAs had a positive impact on the overall Investment Test rating for the state. The bank's performance in the State of New York was not impacted by its performance in the broader state/regional area. Key has demonstrated a good level of responsiveness to the needs of the community, especially in the area of affordable housing.

Albany Assessment Area

During the evaluation period, Key made 51 investments and donations in the Albany AA totaling \$19.5 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on four prior period investments as of June 30, 2008 was \$3 million.

Key's investments are particularly responsive to Albany's affordable housing needs and activities that revitalize and stabilize low- and moderate- income geographies. For instance, the bank made investments totaling \$9.8 million and \$8.6 million in two funds for the development of affordable housing projects through the use of LIHTCs. One of the projects funded created 47 dwelling units in 18 historic row houses within the Park South Urban Renewal Area in the City of Albany, New York. A rehabilitation plan was implemented to modernize the apartments and bring the units up to market quality standards. Very low and low-income households now have high quality housing in an up and coming area.

Buffalo Assessment Area

During the evaluation period, Key made 61 investments and donations in the Buffalo AA totaling \$10.5 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on seven prior period investments as of June 30, 2008 was \$3.6 million.

Key's investments are particularly responsive to Buffalo's affordable housing needs. While the bank's investments in the Buffalo area have been primarily through state and national equity LIHTC funds, the bank also made direct investments into the community as well. One example is a \$4 million investment in a partnership that provides long-term, transitional, supportive housing to homeless women and children. The facility also provides a place where community services are provided to help residents develop job skills, manage their finances, and become self sufficient.

We also gave consideration to bank investments in funds throughout the State of New York and in the broader regional area, but not located within any of the bank's AAs. These investments either have the potential to benefit the AAs or the broader statewide or regional area. Key made 18 statewide investments totaling \$34.4 million in the current evaluation period and 5 statewide investments with remaining balances of \$2.1 million in prior periods. Refer to Table 14 in the State of New York section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area. These additional investments did not impact the bank's overall Outstanding performance under the State of New York.

**Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the New York, Rochester, Syracuse, Utica, and non-metropolitan AAs is not inconsistent with the bank's overall outstanding Investment Test performance in the State of New York. The bank's performance in the Glens Falls, Kingston, and Poughkeepsie AAs is weaker than the overall performance in the state, due to a lower level of investments. While weaker than the overall performance in the state, the bank's performance in the Glens Falls and Poughkeepsie AAs was considered adequate. Performance in the limited-scope AAs had a positive impact on the State of New York Investment Test rating, due to the excellent performance in several of the limited-scope areas. Refer to the Table 14 in the State of New York section of Appendix D for the facts and data that support these conclusions.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the State of New York is rated "Outstanding."

Based on a full-scope review, performance in the Albany and Buffalo AAs is good. The bank's distribution of branch facilities is good in both AAs and the bank's record of providing community development services is excellent in both areas. A stronger distribution of branch facilities in a majority of limited-scope AAs had a positive impact on the overall Service Test rating for the State of New York.

### Retail Banking Services

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

#### Albany Assessment Area

The distribution of bank branches is good in the Albany AA, as they are accessible to all portions of the full-scope area. The percentage of bank 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 below the population percentage. During the evaluation period the bank opened two branches. During the same period the bank closed five branches. The result of combined branch openings and closings was the elimination of two branches in low-income geographies and the elimination of one branch in a middle-income geography. The branch closings did not impact the overall accessibility of branch services in low-income geographies, the bank's distribution of branches in those geographies remains excellent.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

The bank designated a majority of its Albany AA branches as KeyBank Plus program branches that offer affordable check cashing for non-depository clients. In addition to fees that are well below those of check cashing companies, participants receive up to five free money orders per visit which facilitates bill payments.

#### Buffalo Assessment Area

The distribution of bank branches is good in the Buffalo AA, as they are accessible to all portions of the full-scope area. The percentage of bank 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 below the population percentage. During the evaluation period in the Buffalo AA, the bank did not open any branches. During the same period the bank closed one branch in a low-income geography. The branch closing did not impact the overall accessibility of branch services in low-income geographies as the bank's distribution of branches in those geographies remains excellent.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

## **Community Development Services**

### Albany Assessment Area

Bank employees provided an excellent level of community development services to the Albany AA. Eighteen employees provided almost 3,000 hours of financial guidance to numerous organizations serving the community development needs of low-and moderate-income residents and geographies in the Albany community. The services the community development organizations provide address community needs, including economic revitalization, affordable housing, and services for low-and moderate-income individuals and families.

The bank sponsored Super Refund Saturday events in its Albany AA in 2007 and 2008 to facilitate access to the Earned Income Tax Credit (EITC). The bank collaborated with non-profit organizations to publicize the EITC and free tax preparation primarily for low- and moderate-income individuals. Bank employees provided expertise through their participation in the tax preparation process. For 2008, the event resulted in the preparation of 115 tax returns representing over \$200 thousand in tax refunds.

### Buffalo Assessment Area

Bank employees provided an excellent level of community development services to the Buffalo AA. Eleven employees provided almost 1,350 hours of financial guidance to several organizations serving the community development needs of low and moderate-income residents and geographies in the Buffalo community. The services the community development organizations provide address community needs, including economic revitalization, affordable housing, and services for low-and moderate-income individuals and families.

Bank employees provided technical assistance to the Buffalo community by submitting Affordable Housing Program applications to the Cincinnati Federal Home Loan Bank. Specifically, the bank assisted in filing two applications which totaled \$480 thousand.

The bank sponsored a Super Refund Saturday event in its Buffalo AA in 2008 to facilitate access to the Earned Income Tax Credit (EITC). The bank collaborated with non-profit organizations to publicize the EITC and free tax preparation primarily for low- and moderate-income individuals. Bank employees provided expertise through their participation in the tax preparation process. For 2008, the event prepared 68 tax returns representing \$159 thousand in tax refunds.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the non-metropolitan AA, Syracuse, Rochester, and New York, AAs is stronger than the bank's Service Test performance in the Albany and Buffalo full-scope areas. This stronger performance had a positive impact on the overall Service Test rating for the State of New York. The bank's performance in the Poughkeepsie, Utica, and Kingston AAs was good; although, weaker than the overall performance in the state. Performance in the Glens Falls AA is weaker due to its one branch not being accessible to moderate-income geographies.

## State of Washington

<b>CRA Rating for Washington:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- The geographic distribution of Key's lending is excellent in the Seattle AA and good in the Tacoma AA.
- The borrower distribution of loans is good in both the Seattle and Tacoma AAs.
- Community development lending activity has been substantial, especially in the Seattle AA. CD lending positively impacted the Lending Test rating for the state of Washington overall.
- The volume of community development investments is excellent in Tacoma and good in Seattle. The responsiveness of the bank's investments in addressing primary needs for affordable housing had a positive impact on the overall Investment Test rating. The overall level of investments in the State of Washington is excellent.
- The bank's distribution of branch and ATM deposit facilities in the Seattle AA is excellent. The bank also provided an excellent level of community development services in the Seattle AA.

## Description of Institution's Operations in Washington

Key operates 150 branches and 217 deposit-taking ATMs in the State of Washington. These branches represent 14.8 percent of the bank's total branch network. The bank's assessment areas in the state include 10 MSAs and 10 entire counties that comprise the combined non-metropolitan assessment area. The Seattle Metropolitan Division was selected for full-scope review due to its high concentration of deposits (61 percent), reported loans (43.4 percent), and branches (48 percent) within the state. The Tacoma Metropolitan Division was also selected for full-scope review as it, relative to other assessment areas, also had a high concentration of deposits (17.7 percent), reported loans (17.2 percent), and branches (18.7 percent) within the state. The concentration of deposits in these two Metropolitan Divisions of the Seattle-Tacoma-Bellevue MSA far exceeds the non-metropolitan assessment area which is the next largest assessment area in terms of deposits with 8.2 percent of Key's deposits in the state. The remaining assessment areas, including the combined non-metropolitan areas were analyzed using limited-scope procedures. Deposits in Washington represent 13.9 percent of the bank's total deposits. Ranked by deposits, the Washington rating area is the third largest rating area for Key. As such, performance in this rating area had a significant impact on the bank's overall CRA rating.

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

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in State of Washington is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Seattle AA is excellent and good in the Tacoma AA.

### Lending Activity

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

Key's lending activity is adequate in the Seattle and Tacoma AAs, especially considering the strong level of competition in those markets. In Seattle, Key ranks fourth in deposits among 72 depository institutions and has an 8.4 percent share of the market according to June 30, 2007, FDIC deposit data. In Tacoma, Key ranks second among 34 depository institutions with a 16.2 percent of the market. But, with over 550 lenders operating in Seattle AA and more than 450 operating in Tacoma, the majority of which are not depository institutions, Key's lending market shares are lower than its deposit shares.

Key's primary lending products in Seattle are small loans to businesses and home refinance loans, although home purchase and home refinance loans are also actively originated. An insignificant number of multifamily loans and small loans to farms were also made during the period. According to 2006 aggregate CRA data, Key is ranked 17<sup>th</sup> in volume of originated/purchased small business loans with a market share of less than one percent. According to 2006 aggregate HMDA data, Key is ranked 10<sup>th</sup> with a 2.9 percent share for home improvement lending. Key ranks low for both home purchase and home refinance loans, with market shares well under one percent. As the level of Key's multifamily and small farm loans is low, no analyses were performed for these loan types.

Key's primary lending products in Tacoma are home refinance and small loans to businesses, although home purchase and home improvement loans are also actively originated. An insignificant number of multifamily loans and small loans to farms were also made during the period. According to 2006 aggregate HMDA data, Key is ranked eighth in the origination/purchase of home improvement loans with a 2.8 percent share. For small business lending, Key is ranked 15<sup>th</sup> with a 1.3 percent share of the market. Key ranks low for both home purchase and home refinance loans, with market shares well under one percent. As the level of Key's multifamily and small farm loans is low, no analyses were performed for these loan types.

### Distribution of Loans by Income Level of the Geography

The geographic distribution of Key's loans is excellent in Washington. This is primarily based on excellent performance in the Seattle AA and good performance in the Tacoma AA.

### *Home Mortgage Loans*

Refer to Tables 2, 3, 4, and 5 in the state of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases. As the level of Key's multifamily lending is very low in both the Seattle and Tacoma AAs, no analyses were performed for that loan type.

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of Seattle AA and the Tacoma AA is very small. Less than one half of one percent of the housing units are located in those segments

of each of those communities. This has an impact on the opportunity to lend in the low-income neighborhoods. Refer to the Market Profiles in appendix C for the demographic information.

### Seattle Assessment Area

The geographic distributions of home purchase, home improvement, and home refinance are excellent, based primarily on performance in the moderate-income sections of the AA.

The percentage of Key's home purchase loans in moderate-income geographies exceeds the percentages of owner-occupied housing units that are located in that segment of the AA. In low-income areas, the percentage of loans is near the percentage of owner-occupied housing units located in those neighborhoods. However, with the opportunity to lend is very limited due to few owner-occupied housing units in the low-income parts of the AA. Likewise, Key's home purchase market share was too small in 2006 for meaningful analysis.

The percentages of Key's home improvement loans in low-income and moderate-income geographies significantly exceed the percentages of owner-occupied housing units that are located in those segments of the AA. However, low-income performance is not represented by many loans. Key's 2006 market shares in low-income and moderate-income areas exceeded its overall home improvement market share.

The percentage of Key's home refinance loans in moderate-income areas exceeds the percentage of owner-occupied housing units located in that segment of the AA. In low-income areas, the percentage of loans is near the percentage of owner-occupied housing units located in those neighborhoods, although the opportunity to lend is very limited due to few owner-occupied housing units in the low-income parts of the AA. Key's home refinance market share was too small in 2006 for meaningful analysis.

### Tacoma Assessment Area

The geographic distribution of home purchase and home improvement loans is excellent, and the distribution of home refinance loans is adequate.

The percentages of Key's home purchase loans in low-income and moderate-income geographies exceed the percentages of owner-occupied housing units that are located in that segment of the AA. However, low-income performance is not represented by many loans. Key's home purchase market share was too small in 2006 for meaningful analysis.

The percentage of Key's home improvement loans in low-income geographies significantly exceeds the percentage of owner-occupied housing units located in that segment of the AA. Key's 2006 market share in low-income areas significantly exceeded its overall home improvement market share in the AA. However, low-income performance is not represented by many loans. In moderate-income areas, the percentage of lending is substantially equal to the percentage owner-occupied housing units located in that segment of the AA. Key's 2006 market share in moderate-income areas was well below its overall home improvement market share.

The percentage of Key's home refinance loans in moderate-income areas is below the percentage of owner-occupied housing units located in that segment of the AA. In low-income areas, the percentage of loans significantly exceeds the percentage of owner-occupied housing units located in those neighborhoods, although the performance is not represented by many loans as opportunity to lend is very limited. Key's home refinance market share was too small in 2006 for meaningful analysis.

### ***Small Loans to Businesses***

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

#### Seattle Assessment Area

The geographic distribution of small loans to businesses is good in the Seattle AA. The percentage of Key's loans in low-income areas significantly exceeds the percentage of businesses located in that segment of the AA even though the opportunity to lend is very limited due to the small percentage of businesses (2.55 percent) located in low-income parts of the AA. In moderate-income areas, the percentage of loans is near the percentage of businesses located in that portion of the AA. Key's 2006 market shares in low-income areas significantly exceeded its overall small business market share for the AA, and its moderate-income share exceeded its overall share.

#### Tacoma Assessment Area

The geographic distribution of small loans to businesses is good in the Tacoma AA. The percentage of Key's loans in moderate-income geographies exceeds the percentage of businesses located in moderate-income segments of the AA. Key's 2006 moderate-income market share significantly exceeded its overall share in the AA. While the percentage of Key's loans in low-income areas is well below the percentage of businesses located in that portion of the AA, performance is considered adequate for that segment as the opportunity to lend is very limited due to the small percentage of businesses (1.98 percent) located in low-income parts of the AA. Key's 2006 low-income market share significantly exceeded its overall share in the AA.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in Washington. This is based on good performance in both the Seattle and Tacoma AAs.

### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the Market Profiles in appendix C for the demographic information, including poverty rates.

#### Seattle Assessment Area

The borrower distribution of home purchase, home improvement, and home refinance loans is good.

The percentage of home purchase loans to moderate-income borrowers is near the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the area, performance in the low-income market is adequate. Consideration is given to the impact that the area's poverty level has on lending to the low-

income segment of the community. Key's market shares of home purchase loans were too small in 2006 for meaningful analyses.

The percentage of home improvement loans to moderate-income borrowers is near the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home improvement market share to low-income borrowers significantly exceeded the bank's overall home improvement market share in the AA. For moderate-income borrowers, Key's share was lower than its overall home improvement market share.

The percentage of home refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, performance is considered adequate. Consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 market share for home refinance lending was too small for meaningful analysis.

### Tacoma Assessment Area

The borrower distribution of home purchase, home improvement, and home refinance loans is good.

The percentage of home purchase loans to moderate-income borrowers approximates the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the area, performance in the low-income market is adequate. Consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's market shares of home purchase loans were too small in 2006 for meaningful analyses.

The percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, performance is adequate. Consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home improvement market share to low-income borrowers significantly exceeded the bank's overall home improvement market share in the AA. For moderate-income borrowers, Key's share exceeded its overall home improvement market share.

The percentage of home refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, performance is considered adequate. Consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 market share for home refinance lending was too small for meaningful analysis.

### ***Small Loans to Businesses***

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

### Seattle Assessment Area

The borrower distribution of small loans to businesses is good in the Seattle AA. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of small businesses

within the AA. Key's 2006 market share of businesses with revenues of \$1 million or less was too small for meaningful analysis.

### Tacoma Assessment Area

The borrower distribution of small loans to businesses is good in the Tacoma AA. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of small businesses within the AA. Key's market share of businesses with revenues of \$1 million or less significantly exceeds its overall share of small loans to businesses.

### **Community Development Lending**

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

Community development lending activity is excellent the Seattle AA and good in the Tacoma AAs. CD lending had an overall positive impact on the Lending Test rating in Washington.

### Seattle Assessment Area

During the evaluation period Key generated 66 CD loans totaling \$198.2 million in the Seattle area. The CD loans reflect a variety of community development purposes, including affordable housing activities that revitalize/stabilize low-and moderate-income geographies and funding for organizations providing community services targeted to low-and moderate-income individuals and families. For example, Key originated a loan to finance a 50-unit affordable housing complex for low- and moderate-income families, including persons with disabilities and transitional families. Low Income Housing Tax Credits were used in conjunction with this project. A community contact identified affordable housing as a primary Seattle AA community credit need.

### Tacoma Assessment Area

During the evaluation period Key generated six CD loans totaling \$15.0 million in the area. The CD loans reflect a variety of community development purposes such as affordable housing and funding for organizations that provide community services targeted to low-and moderate-income individuals and families. For example, Key provided lines of credit to fund the operating needs of a community organization that primarily provides health care services to low- and moderate-income individuals. Key also originated a construction loan for a 90-unit affordable housing project targeted to low- and moderate-income individuals and sponsored by the local housing authority.

### Additional CD Loan Activity

Consideration was given to seven additional CD loans totaling \$29.0 million within the State of Washington but not located within any of the bank's AAs. While having the potential to benefit one or more of the bank's AAs, these additional CD loans did not impact the overall Outstanding state rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bremerton and Mt Vernon AAs is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Washington. In the Bellingham, Kennewick, Longview, Olympia, Wenatchee, Yakima, and

Washington non-MSA AAs the bank's performance is weaker than the bank's overall performance in the state. Weaker performance in the Bellingham area is due to a lower relative level of CD lending. In the Kennewick and non-MSA areas, the bank had lower CD lending and weaker borrower distribution records. The Longview, Olympia, Wenatchee, and Yakima AAs had lower CD lending and weaker geographic distribution records. The results of the limited-scope reviews did not impact the Lending Test rating for Washington. Refer to the Tables 1 through 12 in the state of Washington section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Washington is rated "Outstanding." Based on a full-scope review, performance in the Tacoma AA is excellent and performance in the Seattle AA is good. The bank's performance in the State of Washington was not impacted by its performance in the broader state/regional area. Key's responsiveness to the identified investment needs of the AA is excellent, especially in the area of affordable housing.

#### Seattle Assessment Area

During the evaluation period, Key made 177 investments and donations in the Seattle AA totaling \$25.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on 53 prior period investments as of June 30, 2008, was \$3.4 million.

Key's investments are particularly responsive to Seattle's affordable housing needs. While the bank's investments in the Seattle area have been primarily through national equity LIHTC funds, the bank also made direct LIHTC investments into community development projects as well. One example is an \$8.4 million investment to in an affordable housing organization that develops apartments for low- and moderate-income individuals and families in the Seattle area. The organization manages over 40 properties, and there are over 6,000 families and individuals on their wait list.

#### Tacoma Assessment Area

During the evaluation period, Key originated 29 investments and donations in the Tacoma AA totaling \$11.1 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on one prior period investment as of June 30, 2008, was \$186 thousand.

Key's investments are particularly responsive to Tacoma's affordable housing needs. The bank's investments in the Tacoma area have been primarily investments in individual LIHTC projects. One example is a \$3.2 million investment in a 210 unit apartment building serving low- and moderate-income individuals and families in the Tacoma area.

Consideration was given to investments the bank made in funds throughout the State of Washington 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 did not make any statewide investments in the current evaluation period, and had one statewide investment with remaining balance of \$276 thousand from a prior period. Refer to Table 14 in the State of Washington section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area. This additional investment did not impact the bank's overall Outstanding performance under the State of Washington.

## Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Bremerton, Longview, and Yakima AAs is not inconsistent with the bank's overall Outstanding performance in the State of Washington. The bank's performance in the Bellingham, Kennewick, Mt. Vernon, Olympia, Wenatchee, and non-metropolitan AAs is weaker than the overall performance in the state, due to a lower level of investments. While weaker than the overall performance in the state, the bank's performance in the Mt. Vernon AA was considered adequate. Performance in the limited-scope AAs did not impact the State of Washington Investment Test rating as the rating was influenced primarily by the performance in the Seattle and Tacoma full-scope areas. Refer to the Table 14 in the State of Washington section of Appendix D for the facts and data that support these conclusions.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service in the State of Washington is rated "Outstanding." Based on a full-scope review, performance in the Seattle AA is excellent, and performance in the Tacoma AA is adequate.

### Retail Banking Services

Refer to Table 15 in the state of Washington 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.

#### Seattle Assessment Area

The distribution of bank branches is excellent in the Seattle AA, as they are readily accessible to all portions of the full-scope area. The percentage of bank branches located in low- and moderate-income geographies exceeds the percentage of the population residing in those geographies. During the evaluation period the bank opened four branches and closed three branches in the AA. The addition of one branch in a moderate-income area improved accessibility to banking services in that geography.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

#### Tacoma Assessment Area

The distribution of bank branches is adequate in the Tacoma AA as they are reasonably accessible to all portions of the full scope area. The percentage of bank 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 significantly below the population percentage. The accessibility of bank branches to residents in moderate-income geographies is adequate however, given that the bank operates branches in low-and middle-income geographies which are near in proximity to moderate-income geographies and therefore able to serve the residents of those geographies. Overall, the accessibility of bank branches throughout Tacoma geographies is adequate. Access to banking services is also augmented by excellent access to deposit-taking ATMs in both low- and moderate-income geographies. The bank operates 76 ATMs within the Tacoma AA. During the evaluation period in the Tacoma AA, the bank did not open any branches. During the same period, the bank consolidated two branches in moderate-income geographies. One consolidation involved a traditional branch facility and the other consolidation involved a satellite office. The branch closings did

not impact the overall accessibility of banking services in low-or moderate-income Tacoma AA geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday hours.

## **Community Development Services**

### Seattle Assessment Area

Bank employees provided an excellent level of community development services to the Seattle AA. Twenty-one employees provided over 2,350 hours of financial guidance to several organizations serving the community development needs of low-and moderate-income residents and geographies in the Seattle community. The services the community development organizations provide address the community's needs including economic revitalization, affordable housing, and services for low-and moderate-income individuals and families.

Bank employees provided technical assistance to the Seattle community by submitting Affordable Housing Program applications to the Cincinnati Federal Home Loan Bank. Specifically, the bank assisted in filing four applications which totaled \$2.9 million.

The bank sponsored Super Refund Saturday events in its Seattle AA in 2007 and 2008 to facilitate access to the Earned Income Tax Credit (EITC). The bank collaborated with non-profit organizations to publicize the EITC and free tax preparation primarily for low- and moderate-income individuals. Bank employees provided expertise through their participation in the tax preparation process. For 2008, the event resulted in the preparation of 57 tax returns representing \$120 thousand in tax refunds.

### Tacoma Assessment Area

Bank employees provided an adequate level of community development services to the Tacoma AA. Nine employees provided 648 hours of financial guidance to several organizations serving the community development needs of low-and moderate-income residents and geographies in the Tacoma community. The services the community development organizations provide address the community's needs, including affordable housing and services for low-and moderate-income individuals and families.

Bank employees provided technical assistance to the Tacoma community by submitting Affordable Housing Program applications to the Cincinnati Federal Home Loan Bank. Specifically, the bank assisted in filing two applications which totaled \$950,000.

The bank sponsored Super Refund Saturday events in its Tacoma AA in 2007 and 2008 to facilitate access to the Earned Income Tax Credit (EITC). The bank collaborated with non-profit organizations to publicize the EITC and free tax preparation primarily for low- and moderate-income individuals. Bank employees provided expertise through their participation in the tax preparation process. For 2008, the event resulted in the preparation of 55 tax returns representing \$111 thousand in tax refunds.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in the non-MSA, Olympia, Bellingham, Yakima, Bremerton, Kennewick, Mt Vernon, and Wenatchee AAs is not inconsistent with the bank's Outstanding performance in the State of Washington. Performance in the Longview AA is weaker due to its one branch not being accessible to low- and moderate-income geographies.

## Cincinnati– Middletown, OH-KY-IN Multistate Metropolitan Area (#17140)

**CRA rating for the Cincinnati– Middletown, OH-KY-IN, Multistate Metro Area<sup>1</sup>:** **Outstanding**  
**The lending test is rated:** **Outstanding**  
**The investment test is rated:** **Outstanding**  
**The service test is rated:** **Low Satisfactory**

The major factors that support this rating include:

- The geographic distribution of Key’s home mortgage and small business lending is good.
- The borrower distribution of Key’s lending is excellent.
- Community development lending activity is excellent and had a positive impact on the Lending Test rating for the Cincinnati Multistate AA.
- The bank had an excellent volume of community development investments that addressed the need for affordable housing.
- The bank’s overall distribution of branches and ATMs in the Cincinnati MultiState MA is adequate.
- The bank provided a good level of community development services in the Cincinnati MultiState MA.

### Description of Institution’s Operations in Cincinnati Multistate Metropolitan Area

Key operates 31 branches and 38 deposit-taking ATMs in the Cincinnati Multistate Metropolitan Area. The MSA includes portions of Ohio, Kentucky, and Indiana. These branches represent 3.1 percent of the bank’s total branch network. Of the 31 branches located within the MSA, none are located within Indiana. Of the branches located in Kentucky, all are located within the Cincinnati Multistate Metropolitan area. The bank’s assessment area includes a portion of the MSA comprised of three entire counties in Ohio and three entire counties within Kentucky. All counties closely surround the city of Cincinnati. The Cincinnati MSA received a full-scope review as it is Key’s only assessment area within the Multistate area. Deposits in Cincinnati Multistate Metropolitan Area represent only 1.7 percent of the bank’s total deposits. As such, performance in this rating area had minimal impact on the bank’s overall CRA rating.

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Lending Test in the Cincinnati Multistate is rated “Outstanding.” Based on a full-scope review, the bank’s performance in the Cincinnati Multistate AA is excellent.

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<sup>1</sup> 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 Activity**

Refer to Table 1 Lending Volume and 1 Other in the “Multistate Metropolitan Area(s)” section of appendix D for the facts and data used to evaluate the bank’s lending activity.

Key’s lending activity is adequate in the Cincinnati Multistate AA, especially considering the strong level of competition in the market. Key ranks ninth in deposits among 70 depository institutions with a 2.4 percent share of the market according to June 30, 2007, FDIC deposit data. But, with over 500 lenders operating in the AA, the majority of which not being depository institutions, Key’s lending market shares are lower than its deposit share.

Our lending analyses focused on home improvement and small business lending as those are Key’s primary product lines in the Cincinnati Multistate MSA. No analyses of multifamily and small farm lending were performed due to Key’s insignificant activity levels for these loan types in this AA. According to 2006 aggregate CRA and HMDA data, Key is ranked fourth in volume of originated/purchased home improvement loans with a 5.25 percent market share. For small business lending, Key is ranked 21<sup>st</sup> a less than one percent share. Key is ranked 140th and 69th in volume of home purchase and home refinance loans respectively with market shares of less than one half of one percent.

## **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key’s loans is good in the Cincinnati Multistate MSA. This is based on an excellent distribution record of home improvement loans, good distributions of home purchase and small business loans, and an adequate distribution of home refinance loans.

### ***Home Mortgage Loans***

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

The geographic distribution of home improvement loans is excellent. The percentage of Key’s loans in moderate-income geographies exceeds the percentages of owner-occupied housing units located in moderate-income segments of the AA, and the percentage of lending in low-income areas significantly exceeds the level of housing within low-income areas. In addition, Key’s 2006 market share of home improvement loans in low-income and moderate-income areas exceeded its overall home improvement market share in the AA.

The geographic distribution of home purchase loans is good, based primarily on performance in moderate-income neighborhoods. The percentage of Key’s loans in moderate-income geographies is near the percentage of owner-occupied housing units located in moderate-income areas. While the percentage of loans in low-income areas is also near the percentage of housing located in that segment, performance is not represented by a material number of loans. Likewise, Key’s 2006 home purchase market share in this AA is too small to conduct meaningful analyses.

The geographic distribution of home refinance loans is adequate. The percentages of Key’s loans in low-income and moderate-income geographies are below the percentages of owner-occupied housing units located in those areas. Key’s 2006 home refinance market share in this AA is too small to conduct meaningful analyses.

### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is good. The percentages of Key's loans in both low-income and moderate-income geographies are near the percentages of businesses located in those segments of the AA. Key's 2006 small business market share in this AA is too small to conduct meaningful analysis.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is excellent in the Cincinnati Multistate AA. This is based on excellent home improvement and home refinance distribution records, coupled with good home purchase and small business distribution records. The home improvement and home refinance activity represent 58 percent of reported loans within this AA.

### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home improvement and home refinance loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA for both product types. While the percentages of loans to low-income borrowers were lower than the percentage of low-income families in the area, performance is considered good, considering the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home improvement market share to low-income borrowers exceeded the percentage of families designated as low-income within the area, while its moderate-income market share was near its overall market share. Key's home refinance market share was too small in the Cincinnati Multistate AA to conduct meaningful analyses.

The distribution of home purchase loans to borrowers of different income levels is good. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was lower than the percentage of low-income families in the area, consideration was given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home purchase market share in this AA was too small for meaningful analysis.

### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of small businesses within the AA. Key's market share of small loans to businesses is too small to conduct meaningful analyses.

### **Community Development Lending**

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

Community development lending had a positive impact on the Lending Test rating for the Cincinnati Multistate area. The bank's record of originating community development loans is excellent. During the evaluation period Key generated 13 CD loans totaling \$29.2 million in the area. The CD loans reflect a variety of community development purposes such as affordable housing and activities that revitalize/stabilize low-and moderate-income geographies. For example, the bank originated a series of five loans totaling \$11.5 million to a local community development fund to stabilize a low-and moderate-income area by increasing residency levels within the urban core business district.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the Cincinnati Multistate area is rated "Outstanding." Based on a full-scope review, performance in the Cincinnati Multistate AA is excellent. Key's responsiveness to the identified investment needs of the assessment area is excellent, especially in the area of affordable housing.

During the evaluation period, Key originated 47 investments and donations in the Cincinnati Multistate AA totaling \$14.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on 35 prior period investments as of June 30, 2008, was \$3.8 million.

We considered 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 the broader regional area. Refer to Table 14 in the Cincinnati Multistate area section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the Cincinnati Multistate and broader regional area. These additional investments did not impact the bank's overall Outstanding performance under the Investment Test for the Cincinnati Multistate AA.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

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

## **Retail Banking Services**

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

The distribution of bank branches in both low- and moderate-income geographies is adequate, as they are reasonably accessible to all portions of the full-scope area. The branch distribution in moderate-income geographies is near to the percentage of the population that resides there. Key operates only one branch in a low-income geography; however, only 6.8 percent of the population resides there. The accessibility of bank ATMS to residents in low- and moderate-income geographies is also adequate. During the evaluation period the bank opened one branch each in low-income and moderate-income geographies, two branches in middle-income geographies and three branches in upper-income geographies. During the same period, the bank did not close any branches. The branch openings had a positive impact on the accessibility of branches to residents in low-and moderate-income geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

## **Community Development Services**

Bank employees provided a good level of community development services to the Cincinnati AA. Eleven employees provided 1,155 hours of financial guidance to a number of organizations serving the community development needs of low-and moderate-income residents and geographies in the Cincinnati MultiState community. The services the community development organizations provide address the community's needs including economic revitalization, affordable housing, and services for low-and moderate-income individuals and families.

Bank employees provided technical assistance to the Cincinnati community by submitting Affordable Housing Program applications to the Cincinnati Federal Home Loan Bank. Specifically, the bank assisted in filing five applications which totaled \$1.6 million.

## Portland –Vancouver – Beaverton, OR-WA Multistate Metropolitan Area (#38900)

### CRA rating for the Portland –Vancouver – Beaverton,

OR-WA Multistate Metro Area <sup>2</sup> :	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Outstanding

The major factors that support this rating include:

- The geographic distribution of Key’s home mortgage and small business lending is good.
- The borrower distribution of Key’s lending is good.
- Community development lending activity has been substantial. Excellent CD lending performance had a positive impact on the Lending Test rating for the Portland Multistate AA.
- The bank had an excellent volume of community development investments that addressed the need for affordable housing and projects that revitalize or stabilize low- and moderate-income geographies.
- The bank’s overall distribution of branches and ATMs in the Portland Multistate area is excellent.

## Description of Institution’s Operations in Portland Multistate Metropolitan Area

Key operates 40 branches and 54 deposit-taking ATMs in the Portland Multistate Metropolitan Area. The MSA includes portions of Oregon and Washington. These branches represent 4 percent of the bank’s total branch network. The bank’s assessment area includes a portion of the MSA comprised of five entire counties in Oregon and one entire county in Washington. The Portland Multistate MSA received a full-scope review as it is Key’s only assessment area within the Multistate area. Deposits in Portland Multistate Metropolitan Area represent only 3.9 percent of the bank’s total deposits. As such, performance in this rating area had minimal impact on the bank’s overall CRA rating.

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Lending Test in the Portland Multistate area is rated “Outstanding.” Based on full-scope reviews, the bank’s performance in the Portland Multistate AA is excellent.

#### Lending Activity

Refer to Table 1 Lending Volume in the Portland Multistate section of appendix D for the facts and data used to evaluate the bank’s lending activity.

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<sup>2</sup> 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.

Key's lending activity is adequate in the Portland Multistate AA, especially considering the strong level of competition in the market. Key ranks fifth in deposits among 43 depository institutions with a 7.8 percent share of the market according to June 30, 2007, FDIC deposit data. But, with over 550 lenders operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Our lending analyses focused on home refinance, home improvement, and small business lending as those are Key's primary product lines in the Portland Multistate area. Key has also done a small volume of small loans to farms and an insignificant number of multifamily loans. Due to the insignificant volume of multifamily loans, no analyses were performed on this product line in this AA. According to 2006 aggregate CRA and HMDA data, Key is ranked eighth in volume of originated/purchased home improvement loans with a 3 percent market share. For small business lending, Key is ranked 15<sup>th</sup> with a one percent share. Key is ranked 65<sup>th</sup> and 124<sup>th</sup> in volume of home refinance and home purchase loans respectively with market shares of less than one half of one percent.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is good in the Portland Multistate AA. This is based on an excellent distribution record of home improvement and home purchase loans, a good distribution of small loans to businesses, and an adequate distribution of home refinance loans. While the distribution of small farm loans is poor, that product line carries little weight when drawing overall conclusions for this AA.

#### ***Home Mortgage Loans***

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

The geographic distribution of home improvement loans is excellent, based primarily on performance in moderate-income neighborhoods. The percentage of Key's loans in moderate-income geographies significantly exceeds the percentages of owner-occupied housing units located in moderate-income segments of the AA. Key's 2006 market share of home improvement loans in moderate-income areas exceeded its overall home improvement market share in the AA. In low-income areas, the percentage of lending exceeds the level of housing within low-income areas, although the performance is not represented by a material number of loans. Likewise, the market share performance is also not very meaningful.

The geographic distribution of home purchase loans is excellent, based primarily on performance in moderate-income neighborhoods. The percentage of Key's loans in moderate-income geographies exceeds the percentages of owner-occupied housing units located in moderate-income segments of the AA. In low-income areas, the percentage of lending significantly exceeds the level of housing within low-income areas, although the performance is not represented by a material number of loans. Likewise, Key's 2006 home purchase market share in this AA is too small to conduct meaningful analyses.

The geographic distribution of home refinance loans is adequate, based primarily on performance in moderate-income neighborhoods. The percentage of Key's loans in moderate-income geographies is lower than the percentages of owner-occupied housing units located in moderate-income segments of the AA. While the percentage of lending in low-income areas is well below the percentage of owner-occupied housing units located in that segment of the AA, there are limited opportunities for lending as only .71 percent of owner-occupied units in the AA are located in low-income geographies. Likewise, Key's 2006 home refinance market share in this AA is too small to conduct meaningful analyses.

### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is excellent. The percentage of Key's loans in low-income geographies significantly exceeds the percentages of businesses located in those segments of the AA. The percentage of lending in moderate-income areas is near to the percentage of businesses located in those segments. Key's 2006 small business market share in moderate-income areas exceeded its overall small business share, and significantly exceeded it in the low-income areas.

### ***Small Loans to Farms***

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

The geographic distribution of small loans to farms is poor. The percentages of loans in low-income and moderate-income areas are well below the percentages of farms located in those respective areas. However, there are few opportunities to lend in low-income geographies as only 1.17 percent of farms are located in those geographies. Likewise, Key's 2006 small farm market shares in low-income and moderate-income areas are well below its overall small farm market share for the area.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in the Portland Multistate AA. This is based on excellent home improvement distribution, good distribution records for loans to small businesses and small farms, and adequate distribution records for home purchase and home refinance loans. The small loans to businesses and farms represent 58 percent of reported loans within this AA.

### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home improvement loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. And, Key's 2006 market share to moderate-income borrowers exceeded its overall home improvement market share for this AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, performance is considered good, considering the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home improvement market share to low-income borrowers significantly exceeded the percentage of families designated as low-income within the area.

The borrower distribution of home refinance is adequate, based on excellent performance with regard to lending to moderate-income borrowers, coupled with poor lending performance to low-income borrowers. While the percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers within the AA, the percentage of lending to low-income borrowers is well

below the percentage of low-income borrowers in the area, even considering the impact that the area's poverty level has on lending to this segment of the community. Key's 2006 home refinance market share was too small in the Portland Multistate AA to conduct meaningful analyses.

The distribution of home purchase loans to borrowers of different income levels is adequate. The percentage of loans to moderate-income borrowers is below the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home purchase market share in this AA was too small for meaningful analysis.

### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with revenues of \$1 million or less is below the percentage of small businesses within the AA. However, Key's 2006 market share of small loans to businesses significantly exceeds its overall small business market share in this AA.

### ***Small Loans to Farms***

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

The borrower distribution of small loans to farms is good. The percentage of loans to farms with revenues of \$1 million or less is below the percentage of small farms within the AA. However, Key's 2006 market share of small loans to farms exceeds its overall small business market share in this AA.

### **Community Development Lending**

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

Community development lending had a significant positive impact on the Lending Test rating for the Portland Multistate area. The bank's record of originating community development loans is excellent. During the evaluation period Key generated 53 CD loans totaling \$120.8 million in the area.

The CD loans reflect a variety of community development purposes, such as affordable housing activities that revitalize/stabilize low-and moderate-income geographies and funding for organizations providing community services targeted to low-and moderate-income individuals and families. For example, Key originated a series of nine loans totaling \$17 million to an organization providing services targeted to low- and moderate-income individuals and families. Additionally, the bank originated three loans totaling \$16.6 million to provide living accommodations to low- and moderate-income women suffering from domestic violence. The bank also originated a series of five loans totaling \$23 million to provide permanent mortgages for affordable housing for low- and moderate-income individuals.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the Portland Multistate area is rated "Outstanding." Based on a full-scope review, performance in the Portland Multistate AA is excellent. Key's responsiveness to the identified investment needs of the assessment area is excellent, especially in the area of affordable housing and projects that revitalize or stabilize low- and moderate-income geographies.

During the evaluation period, Key originated 76 investments and donations in the Portland Multistate AA totaling \$56 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on 44 prior period investments as of June 30, 2008, was \$16.5 million.

We considered 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 the broader regional area. Refer to Table 14 in the Portland Multistate area section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the Portland Multistate and broader regional area. These additional investments did not impact the bank's overall Outstanding performance under the Portland Multistate AA.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the Portland MultiState area is rated "Outstanding." Based on a full-scope review, performance in the Portland MultiState AA is excellent.

### **Retail Banking Services**

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

The distribution of bank branches is excellent in the Portland MultiState area, as they are readily accessible to all portions of the full-scope area. The percentage of bank branches located in low- and moderate-income geographies exceeds the percentage of the population residing in those geographies. During the evaluation period the bank opened one branch each in middle-and upper-income geographies. During the same period, the bank did not close any branches.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

The bank designated a majority of its Portland MultiState AA branches as KeyBank Plus program branches that offer affordable check cashing for non-depository clients. In addition to fees that are well below those of check cashing companies, participants receive up to five free money orders per visit which facilitates bill payments.

## **Community Development Services**

Bank employees provided an excellent level of community development services to the Portland MultiState MA. Nineteen employees provided 2,856 hours of financial guidance to a number of organizations serving the community development needs of low-and moderate-income residents and geographies. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare, and educational services for low-and moderate-income individuals and families.

Bank employees provided technical assistance to the Portland community by submitting Affordable Housing Program applications to the Cincinnati Federal Home Loan Bank. Specifically, the bank assisted in filing four applications which totaled \$505 thousand.

The bank sponsored Super Refund Saturday events in its Portland MultiState AA in 2007 and 2008 to facilitate access to the Earned Income Tax Credit (EITC). The bank collaborated with non-profit organizations to publicize the EITC and free tax preparation primarily for low- and moderate-income individuals. Bank employees provided expertise through their participation in the tax preparation process. For 2008, the event resulted in the preparation of 79 tax returns representing \$111 thousand in tax refunds.

## State of Alaska

<b>CRA Rating for Alaska:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- The geographic distribution of Key's lending is good.
- The borrower distribution of Key's lending is adequate.
- Key has an excellent community development lending record in Alaska. CD lending had a substantial positive impact on the state's Lending Test rating.
- The bank had an excellent volume of community development investments including a substantial statewide investment.
- The bank's overall distribution of branches is excellent.

## Description of Institution's Operations in Alaska

Key operates 17 branches and 19 deposit-taking ATMs in the State of Alaska. These branches represent 1.7 percent of the bank's total branch network. The bank's assessment areas in the state include 2 MSAs and 6 entire counties that comprise the combined non-metropolitan assessment area. The Anchorage MSA was selected for full-scope review due to its high concentration of deposits (62 percent), reported loans (61.6 percent), and branches (35.3 percent) within the state. The concentration of deposits in the Anchorage MSA far exceeds the non-metropolitan MSA which is the next largest assessment area in terms of deposits with 23 percent of Key's deposits in the state. The remaining assessment areas, including the combined non-metropolitan areas were analyzed using limited-scope procedures. Deposits in Alaska represent only 1.3 percent of the bank's total deposits. As such, performance in this rating area had minimal impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Alaska is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Anchorage AA is excellent.

### Lending Activity

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

Key's lending activity is adequate in the Anchorage AA, especially considering the strong level of competition in the market. Key ranks fourth in deposits among five depository institutions with a 13.2 percent share of the market according to June 30, 2007, FDIC deposit data. But, with over 200 lenders operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Our lending analyses focused on small business lending as that is Key's primary product line in the Anchorage AA. Key has also done a small volume of home purchase, home improvement, and home refinance lending. As an insignificant number of multifamily loans and no small farm loans were made during the period, no analyses were performed on these product lines for this AA. According to 2006 aggregate CRA and HMDA data, Key is ranked 14<sup>th</sup> in volume of originated/purchased small loans to businesses with a market share that is less than one percent. For home improvement lending, Key is ranked ninth with a four percent share. For home purchase and home refinance lending, Key is ranked 51<sup>st</sup> and 35<sup>th</sup> respectively, with shares of less than one percent.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is good in Alaska. This is primarily based on a good distribution record within the Anchorage full-scope AA, with most weight placed on small business lending.

#### ***Home Mortgage Loans***

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

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of the Anchorage AA is very small. Less than one half of one percent of the housing units are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods. The geographic distribution of home purchase loans is excellent, based primarily on performance in moderate-income neighborhoods in the Anchorage AA. The percentage of Key's loans in moderate-income geographies significantly exceeds the percentages of owner-occupied housing units located in moderate-income segments of the AA. In low-income areas, the percentage of lending also significantly exceeds the level of housing within low-income areas, although the performance is not represented by a material number of loans. Key's home purchase market share is too small in Anchorage to perform meaningful analyses.

The geographic distribution of home improvement loans is good. The percentage of loans made in moderate-income areas is near the percentage of owner-occupied housing units located in those segments of the community. Key's 2006 home improvement market share in moderate-income neighborhoods exceeded its overall home improvement market share for Anchorage. While Key made no home improvement loans in low-income neighborhoods during the period, the opportunity to lend is very low given the small percentage of housing units (.40 percent) located there.

The geographic distribution of home refinance loans is adequate. The percentage of loans made in moderate-income areas is below the percentage of owner-occupied housing units located in that segment of the community. While Key made no home refinance loans in low-income neighborhoods during the period, the opportunity to lend is very low given the small percentage of housing units located there.

#### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is good, based primarily on performance in the moderate-income neighborhoods. The percentage of Key's loans in moderate-income geographies is

near the percentages of businesses located in those segments of the AA. The percentage of lending in low-income areas is significantly lower than the percentage of businesses located there. While performance is considered poor in the low-income areas, consideration is given to the fact that the number of businesses located in low-income neighborhoods is limited. Less than two percent of the AA's businesses are located in low-income areas, impacting the bank's opportunity to lend. Key's 2006 small business market share in the Anchorage AA is too small to perform meaningful analyses.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in Alaska. This is primarily based on a good distribution record within the Anchorage full-scope AA, with most weight placed on small business lending.

#### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentages of loans to low-income and moderate-income borrowers significantly exceed the respective percentages of low- and moderate-income families in the AA. Key's 2006 home purchase market share was too small for meaningful analyses.

The borrower distribution of home improvement loans is good. The percentage of loans made to moderate-income borrowers is near the percentage of moderate-income borrowers within the AA. Key's 2006 market share of home improvement loans to moderate-income borrowers is also near its overall home improvement market share for the Anchorage AA. While the percentage of loans made to low-income borrowers is well below the percentage of low-income borrowers in the AA, performance is considered adequate as consideration is also given to the impact the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home improvement market share to low-income borrowers is well below its overall home improvement market share for the AA.

The borrower distribution of home refinance loans is good. The percentage of loans made to moderate-income borrowers is near the percentage of moderate-income borrowers within the AA. While the percentage of loans made to low-income borrowers is below the percentage of low-income borrowers in the AA, performance is considered adequate when considering the impact the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home refinance market share is too small to perform meaningful analyses.

#### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is adequate. The percentage of loans to businesses with revenues of \$1 million or less is below the percentage of small businesses within the

AA. Key's 2006 market share of small loans to business lending is too small for meaningful analyses in this AA.

### **Community Development Lending**

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

Community development lending had a substantial positive impact on the Lending Test rating for Alaska. The bank's record of originating community development loans is excellent in the Anchorage AA. During the evaluation period Key generated 6 CD loans totaling \$35.9 million in the area. The CD loans reflect a variety of community development purposes such as affordable housing and activities that revitalize/stabilize low-and moderate-income geographies. For example, the bank originated a \$900 thousand loan to an organization for affordable housing purposes for low- and moderate-income individuals. The organization is dedicated to community redevelopment through construction, lending, and neighborhood revitalization activities within specifically targeted neighborhoods.

#### Additional CD Loan Activity

Consideration was given to ten additional CD loans the bank made totaling \$48.7 million within the State of Alaska but not located within any of the bank's AAs. However, these loans have the potential to benefit one or more of the bank's AAs. These additional CD loans had a positive impact on the overall state rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the non-MSA Alaska AA is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Alaska. Performance in the Fairbanks AA is weaker than the bank's overall Lending Test performance in the state as the geographic distribution record is weak in that AA. The results of the limited-scope reviews did not impact the overall Lending Test rating for Alaska. Refer to the Tables 1 through 13 in the state of Alaska section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Alaska is rated Outstanding. Based on a full-scope review, performance in the Anchorage AA is excellent. The bank's performance in the State of Alaska was enhanced by investments made in the in the broader state-wide area.

During the evaluation period, Key originated 10 investments and donations in the Anchorage AA totaling \$3.9 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on one prior period investment as of June 30, 2008, was \$71 thousand.

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 assessment areas. These investments, while not located

directly within the bank's AAs; either have the potential to benefit the assessment areas or the broader statewide or regional area. Key made one statewide investment of \$2.9 million in the current evaluation period and one statewide investment with a remaining balance of \$1.1 million in a prior period. Refer to Table 14 in the State of Alaska section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the Fairbanks and non-metropolitan AAs is weaker than the overall performance in the state, due to a lower level of investments. Performance in the limited-scope assessment areas did not impact the State of Alaska Investment Test rating as the rating was influenced primarily by the excellent performance in the Anchorage full-scope area and by statewide investments that had the potential to benefit the bank's assessment areas. Refer to the Table 14 in the State of Alaska section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Alaska is rated "Outstanding." Based on a full-scope review, performance in the Anchorage AA is excellent.

### **Retail Banking Services**

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

The distribution of bank branches is excellent in the Anchorage AA, as they are readily accessible to all portions of the full-scope area. The accessibility of bank branches to residents in moderate-income Anchorage geographies is excellent. The percentage of branches located in moderate-income geographies significantly exceeds the percentage of the population residing in those geographies. While the bank has no branches located in low-income geographies, just over 1 percent of the population resides in those geographies. Similarly, of all Anchorage AA businesses less than 2 percent are located in low-income geographies. Overall, the accessibility of bank ATMs throughout Anchorage geographies is excellent.

During the evaluation period the bank did not open or close any branches.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

### **Community Development Services**

Bank employees provided only a minimal level of community development services to the Anchorage AA which did not impact the overall Service Test rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in the Fairbanks AA is weaker than the bank's overall High Satisfactory performance under the Service Test in the State of

Alaska. The weaker performance resulted from the bank's branch facilities in moderate-income geographies in the Fairbanks AA being less accessible than the bank's branches in the Anchorage AA. For the non-MSA Alaska AA, none of the population resides in low-income geographies and less than one quarter of one percent of the population resides in moderate-income geographies. The difference in performance in the limited scope AA's did not impact the bank's overall performance in the State of Alaska. The bank derives the most significant concentration of deposits in the State of Alaska from the full-scope Anchorage AA.

## State of Colorado

<b>CRA Rating for Colorado:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- The geographic distribution of Key's lending is excellent.
- The borrower distribution of Key's lending is good.
- Community development lending activity has been substantial. Excellent CD lending performance had a positive impact on the Lending Test rating for the Colorado AA.
- The bank had an excellent volume of community development investments that addressed the need for affordable housing.
- Overall, the accessibility of bank branch facilities throughout Denver geographies is adequate.
- The bank also provides an excellent level of community development services to the Denver AA.

## Description of Institution's Operations in Colorado

Key operates 51 branches and 56 deposit-taking ATMs in the State of Colorado. These branches represent 5 percent of the bank's total branch network. The bank's assessment areas in the state include 5 MSAs or portions of MSAs and 2 entire counties that comprise the combined non-metropolitan assessment area. The Denver MSA was selected for full-scope review due to its high concentration of deposits (85.4 percent), reported loans (74.8 percent), and branches (70.6 percent) within the state. The concentration of deposits in the Denver MSA far exceeds the Ft. Collins MSA which is the next largest assessment area in terms of deposits with 5.2 percent of Key's deposits in the state. The remaining assessment areas, including the combined non-metropolitan areas were analyzed using limited-scope procedures. Deposits in Colorado represent only 4 percent of the bank's total deposits. As such, performance in this rating area had minimal impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Colorado is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Denver AA is excellent.

### Lending Activity

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

Key's lending activity is adequate in the Denver AA, especially considering the strong level of competition in the market. Key ranks sixth in deposits among 84 depository institutions with a 4.3

percent share of the market according to June 30, 2007, FDIC deposit data. But, with over 700 lenders operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Our lending analyses focused on small business lending as that is Key's primary product line in the Denver AA. Key has also originated home purchase, home improvement, and home refinance loans in the Denver AA. As an insignificant number of multifamily loans and no small farm loans were made during the period, no analyses were performed on these product lines for this AA. According to 2006 aggregate CRA and HMDA data, Key is ranked 17<sup>th</sup> in volume of originated/purchased small loans to businesses with a market share that is less than one percent. For home improvement lending, Key is ranked tenth with a 2.4 percent share. For home purchase and home refinance lending, Key is ranked 179<sup>th</sup> and 73<sup>rd</sup> respectively, with shares of one quarter of one percent or less.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is excellent in Colorado. This is primarily based on an excellent distribution record within the Denver full-scope AA, with most weight placed on small business lending.

#### ***Home Mortgage Loans***

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

The geographic distribution of home purchase loans is excellent. The percentage of Key's loans in low-income geographies significantly exceeds the percentages of owner-occupied housing units located in the low-income segments of the AA. In moderate-income areas, the percentage of lending exceeds the level of housing within low-income areas. Key's 2006 home purchase market share is too small in Denver to perform meaningful analyses.

The geographic distribution of home improvement loans is excellent. The percentage of Key's loans in low-income and moderate-income geographies exceeds the percentages of owner-occupied housing units located in those segments of the AA. Key's 2006 home-improvement market share in moderate-income neighborhoods significantly exceeded its overall home improvement market share in Denver. In low-income areas, Key's market share was near its overall home improvement market share.

The geographic distribution of home refinance loans is adequate. The percentage of loans made in low-income and moderate-income areas is below the percentage of owner-occupied housing units located in that segment of the community. Key's 2006 home refinance market share is too small in Denver to perform meaningful analyses.

#### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is excellent. The percentage of Key's loans in low-income geographies exceeds the percentages of businesses located in those segments of the AA. The percentage of lending in moderate-income areas significantly exceeds the percentage of businesses located there. Key's small business market share was too small in 2006 for meaningful analysis.

## **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in Denver AA. This is primarily based on a good distribution record within the Denver full-scope AA, with most weight placed on small business lending.

### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentage of loans to low-income borrowers is substantially equal to the percentage of low-income families within the AA. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers in the area. Key's 2006 home purchase market share was too small for meaningful analyses.

The borrower distribution of home improvement loans is good. While the percentage of loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers within the AA, the percentage of loans to low-income borrowers is below the level of low-income borrowers in the area. Key's 2006 market share of home improvement loans to low-income borrowers exceeded its overall home improvement market share in Denver, while its moderate-income borrower share significantly exceeded its overall share.

The borrower distribution of home refinance loans is good. While the percentage of loans made to moderate-income borrowers exceeds the percentage of moderate-income borrowers within the AA, the percentage of loans to low-income borrowers is below the level of low-income borrowers in the area. Key's 2006 market share of home refinance loans is too small for meaningful analysis.

### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of small businesses within the AA. Key's 2006 market share of small loans to business lending is too small for meaningful analyses in this AA.

## **Community Development Lending**

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

Community development lending had a positive impact on the Lending Test rating for Colorado. The bank's record of originating community development loans is excellent in the Denver AA. During the

evaluation period Key generated 27 CD loans totaling \$96 million in the area. The CD loans reflect a variety of community development purposes such as affordable housing and activities that revitalize/stabilize low-and moderate-income geographies. For example, the bank originated a series of ten loans totaling \$34 million to a local non-profit housing authority. The mission of this organization is to provide affordable housing to low-and moderate-income residents. The purpose of the loans was to provide short term bridge financing for residential housing projects in anticipation of permanent financing and fund costs associated with predevelopment and other related projects. The bank also originated a series of six loans totaling \$45 million to another local non-profit housing authority with a mission of providing affordable housing to low-and moderate-income families. These efforts directly addressed the Denver AA's need for affordable housing as identified by a community contact.

#### Additional CD Loan Activity

Consideration was given to two additional CD loans totaling \$342 thousand within the State of Colorado but not located within any of the bank's AAs. While having the potential to benefit one or more of the bank's AAs, these additional CD loans did not impact the overall state rating.

#### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bolder, Colorado Springs, and Fort Collins AAs is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Colorado. Performance in the Greeley and Colorado non-MSA AAs is weaker than the bank's overall Lending Test performance in the state. Weaker performance in the Greeley AA is due to weaker geographic distribution performance and relatively lower levels of CD lending activity. The non-MSA performance is weaker due to lower relative levels of CD lending. The results of the limited-scope reviews did not have a significant impact on the Lending Test rating for Colorado. Refer to the Tables 1 through 12 in the state of Colorado section of appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Colorado is rated "Outstanding." Based on a full-scope review, performance in the Denver AA is excellent. The bank's performance in the State of Colorado was not impacted by investments made in the in the broader regional area. Key's responsiveness to the identified needs of the assessment area is excellent, especially in the area of affordable housing.

During the evaluation period, Key originated 42 investments and donations in the Denver AA totaling \$11.8 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on 39 prior period investments as of June 30, 2008, was \$4.2 million.

Consideration was 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 the broader regional area. Refer to Table 14 in the State of Colorado section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the State of Colorado and broader regional area. These additional investments did not impact the bank's overall Outstanding performance under the State of Colorado.

## **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the Boulder, Colorado Springs, and Greeley AAs is not inconsistent with the bank's overall Outstanding performance in the State of Colorado. The bank's performance in the Ft. Collins and non-metropolitan AAs is weaker than the overall performance in the state, due to a lower level of investments. While weaker than the overall performance in the state, the bank's performance in the Ft. Collins AA was considered good. Performance in the limited-scope assessment areas did not impact the State of Colorado Investment Test rating as the rating was influenced primarily by the performance in the Denver full-scope area. Refer to the Table 14 in the State of Colorado section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Colorado is rated "Low Satisfactory." Based on a full-scope review, performance in the Denver AA is adequate.

### **Retail Banking Services**

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

The distribution of bank branches is adequate in the Denver AA, as they are reasonably accessible to all portions of the full-scope area. The percentage of bank branches located in low- and moderate-income geographies is below the respective percentages of the population residing in those geographies. The distribution of ATMs in both low- and moderate-income geographies is also adequate. During the evaluation period the bank opened nine branches. During the same period, the bank closed five branches. The result of combined branch openings and closings was the addition of four branches in upper-income geographies. The branch closings did not adversely impact the accessibility of banking services in low-and moderate-income Denver AA geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

The bank designated a majority of its Denver AA branches as KeyBank Plus program branches that offer affordable check cashing for non-depository clients. In addition to fees that are well below those of check cashing companies, participants receive up to five free money orders per visit which facilitates bill payments.

### **Community Development Services**

Bank employees provided an excellent level of community development services to the Denver AA. Ten employees provided over 2,700 hours of financial guidance to a number of organizations serving the community development needs of low-and moderate-income residents and geographies in the Denver community. The services the community development organizations provide, address community needs including economic revitalization, affordable housing, and services for low-and moderate-income individuals and families.

Bank employees provided technical assistance to the Denver community by submitting Affordable Housing Program applications to the Cincinnati Federal Home Loan Bank. Specifically, the bank assisted in filing one application which totaled \$2 million.

The bank sponsored Super Refund Saturday events in its Denver AA in 2007 and 2008 to facilitate access to the Earned Income Tax Credit (EITC). The bank collaborated with non-profit organizations to publicize the EITC and free tax preparation primarily for low- and moderate-income individuals. Bank employees provided expertise through their participation in the tax preparation process. For 2008, the event resulted in the preparation of 72 tax returns representing \$146 thousand in tax refunds.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in the Colorado Springs, Fort Collins and Greeley AAs is stronger than the bank's Low Satisfactory performance under the Service Test in the State of Colorado. The bank's overall stronger performance in the Colorado Springs, Fort Collins and Greeley AAs is the result of excellent accessibility of the bank's branch facilities to the portion of the population residing moderate-income geographies. The bank's performance in the Boulder AA is weaker than its overall adequate performance in the full-scope Denver AA. The weaker performance resulted from the bank's branches in low-and moderate-income geographies in the Boulder AA being less accessible than the bank's branches in the Denver AA. For the non-MSA Colorado AA, none of the population resides in low-or moderate-income geographies. The difference in performance in the limited scope AA's did not impact the bank's overall performance in the State of Colorado which was based primarily on the adequate performance in the Denver AA. The bank derives over 85 percent of its concentration of deposits in the State of Colorado from the full-scope Denver AA.

## State of Florida

<b>CRA Rating for Florida:</b>	<b>Needs to Improve</b>
<b>The lending test is rated:</b>	<b>Low Satisfactory</b>
<b>The investment test is rated:</b>	<b>Needs to Improve</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Significant consideration was given to the bank's presence in Florida that was designed to focus on private banking and investment activities in the state. While the bank has four private banking offices (branches) in Florida that provide retail banking services, these services are provided primarily in response to the needs of the bank's private banking customers rather than retail clients. We considered this factor during our analysis of Lending and Service test performance. In addition, the stronger lending performance in limited-scope AAs had a positive impact on the overall Lending Test rating. Limited-scope AAs represented 66 percent of the bank's deposits within the state of Florida. Based on these considerations:
  - The geographic distribution of Key's lending is adequate.
  - The borrower distribution of Key's lending is adequate.
  - The bank's distribution of branches and ATMs in the Cape Coral AA is adequate. The bank also provided a good level of community development services in the AA.
  - The bank's volume of qualified community development investments is poor when considering the bank's capacity and size and that some investment opportunities exist within the bank's AAs.

## Description of Institution's Operations in Florida

Key operates four branches and no ATMs in the State of Florida. Its branch network in Florida consists of Private Banking and Investment offices that exist primarily to service existing clients and do not actively solicit deposits or loan products to the general public. Outreach to the greater Florida area is limited. These branches represent .4 percent of the bank's total branch network. The bank's assessment areas in the state include one MD and two MSAs. The Cape Coral MSA was selected for full-scope review due to its high concentration of deposits (33.9 percent), reported loans (48.3 percent), and branches (50 percent) within the state. While the concentration of deposits in the Cape Coral MSA was less than that of the Naples MSA which had the largest share of deposits (53.3 percent) within the state, the Cape Coral MSA had significantly more reported loans and a greater branch presence than the Naples MSA. The remaining assessment areas were analyzed using limited-scope procedures. Deposits in Florida represent only 1.4 percent of the bank's total deposits. As such, performance in this rating area had minimal impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Florida is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Cape Coral AA is adequate. Consideration was given to

the fact that the bank's strategy in Florida is focused on private banking rather than retail customers. Stronger lending performance in limited-scope AAs had a positive impact on the overall Lending Test Rating for the State of Florida.

### **Lending Activity**

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

Key's lending activity is low in the Cape Coral AA but considered adequate due to the bank's limited presence and the strong level of competition in the market. Key ranks 11<sup>th</sup> in deposits among 44 depository institutions with a 2.4 percent share of the market according to June 30, 2007, FDIC deposit data. But, with nearly 750 lenders operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Key has originated home purchase, home improvement, home refinance, and small loans to businesses in the AA. As no multifamily loans and no small farm loans were made during the period, no analyses were performed on these product lines for this AA. According to 2006 aggregate CRA and HMDA data, Key is ranked low in the volume of originated/purchased loans for each product types, with market share of less than one tenth of one percent. The exception is home improvement lending where Key is ranked 13<sup>th</sup> with a 2 percent share of the market.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is adequate in Florida. This is based on an overall poor distribution record within the Cape Coral full-scope AA; however, the overall distribution record was positively impacted by stronger performance in limit-scope areas and consideration of the bank's primary focus on private banking activities in the state.

### ***Home Mortgage Loans***

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

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of the Cape Coral AA is very small. Less than one percent of the housing units are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods.

The geographic distribution of home purchase, home improvement, and home refinance loans is poor. For each loan type, the percentages of Key's loans in low-income and moderate-income geographies are well below the percentages of owner-occupied housing units located in those areas. Key's 2006 home purchase and home refinance market shares are too small in Cape Coral to perform meaningful analyses. The home improvement market share in low-income areas significantly exceeded Key's share of the area's home improvement market, and the share in moderate-income areas was below its overall market share.

### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is good. The percentage of Key's loans in moderate-income geographies significantly exceeds the percentages of businesses located in those segments of the AA. The percentage of lending in low-income areas is well below the percentage of businesses located there; however, the opportunities to lend are limited as only .97 percent of small businesses are located in these geographies. Key's small business market share was too small in 2006 for meaningful analysis.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is adequate in Florida. This is based on an overall poor distribution record within the Cape Coral full-scope AA; however, the overall distribution record was positively impacted by stronger performance in limit-scope areas, and considering the bank's primary focus on private banking activities in the state.

#### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home purchase, home refinance, and home improvement loans to borrowers of different income levels is very poor. The percentages of loans to low-income borrowers and moderate-income borrowers are well below the percentages of low-income and moderate-income families within the AA. Key's 2006 home purchase and home refinance market shares were too small for meaningful analyses. Key's 2006 market share of home improvement loans to low-income borrowers was well below its overall home improvement market share in Cape Coral, while its moderate-income borrower share was zero.

#### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is adequate. The percentage of loans to businesses with revenues of \$1 million or less is below the percentage of small businesses within the AA. Key's 2006 market share of small loans to business lending is too small for meaningful analyses in this AA.

### **Community Development Lending**

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

Key made no CD loans in the Cape Coral AA during the evaluation period. This record of lending had a neutral impact on the Lending Test rating in Florida. However, the bank made 8 CD loans totaling \$5.4

million within the State of Florida but not located within any of the bank's AAs. While having the potential to benefit one or more of the bank's AAs, these CD loans did not impact the overall state rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Naples and West Palm Beach AAs is not inconsistent with the bank's overall Low Satisfactory performance under the Lending Test in Florida. Performance in both areas is stronger than the performance in the full-scope area based on stronger geographic and borrower distribution records. The results of the limited-scope reviews had a positive impact on the overall Lending Test rating conclusions for Florida. Limited-scope AAs represented 66 percent of the bank's reported deposits in the state. Refer to the Tables 1 through 12 in the state of Florida section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Florida is rated "Needs to Improve". Based on a full-scope review, performance in the Cape Coral AA is poor when considering the bank's capacity and size and considering that some opportunities for investment exist in the AA. The bank's performance in the State of Florida was not impacted by investments made in the broader regional area.

During the evaluation period, Key did not make any investments and donations in the Cape Coral assessment area. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on one prior period investment as of June 30, 2008, was \$2 thousand.

The bank also made investments 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 the broader regional area. Refer to Table 14 in the State of Florida section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the State of Florida and broader regional area. These additional investments did not impact the bank's overall performance under the State of Florida since Key did not have an adequate level of investments in its Florida assessment areas.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the Naples and West Palm Beach AAs is not inconsistent with the overall Needs to Improve Investment Test rating for the State of Florida. Refer to the Table 14 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Florida is rated "Low Satisfactory." Performance in the Cape Coral AA is adequate.

### **Retail Banking Services**

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

The distribution of bank branches is adequate in the Cape Coral AA. The bank operates just two branch locations within the AA and both are located in middle-income geographies where the majority (61.1 percent) of the population resides. These offices operate primarily to service existing private banking clients. Deposits and loans are not actively solicited to the general public. The location of these branches is consistent with the bank's private banking strategy for the area. During the evaluation period the bank did not open or close any branches in the Cape Coral AA.

### **Community Development Services**

Bank employees provided a good level of community development services to the Cape Coral AA. Three employees provided over 470 hours of financial guidance to organizations serving the community development needs of low-and moderate-income residents and geographies in the Cape Coral community. The services the community development organizations provide address the community needs including affordable housing and services for low- and moderate-income individuals and families.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Naples and West Palm Beach AAs is not inconsistent with the bank's overall Low Satisfactory performance in the State of Florida.

## State of Idaho

<b>CRA Rating for Idaho:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Low Satisfactory</b>
<b>The service test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- The geographic distribution of Key’s lending is good.
- The borrower distribution of Key’s lending is excellent.
- Community development lending activity has been substantial. Excellent CD lending performance had a positive impact on the Lending Test rating for the Boise AA.
- The bank made an adequate volume of community development investments given limited opportunities.
- The bank’s distribution of branches and ATMs in the Boise AA is excellent.
- The bank provided an excellent level of community development services in the Boise AA.

## Description of Institution’s Operations in Idaho

Key operates 31 branches and 36 deposit-taking ATMs in the State of Idaho. These branches represent 3.1 percent of the bank’s total branch network. The bank’s assessment areas in the state include 3 MSAs or portions of MSAs and 8 entire counties that comprise the combined non-metropolitan assessment area. The Boise MSA was selected for full-scope review due to its high concentration of deposits (60.6 percent), reported loans (57.1 percent), and branches (45.2 percent) within the state. The concentration of deposits in the Boise MSA far exceeds the non-metropolitan assessment area which is the next largest assessment area in terms of deposits with 21.6 percent of Key’s deposits in the state. The remaining assessment areas, including the combined non-metropolitan areas were analyzed using limited-scope procedures. Deposits in Idaho represent only 1.8 percent of the bank’s total deposits. As such, performance in this rating area had minimal impact on the bank’s overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Lending Test in Idaho is rated “Outstanding.” Based on a full-scope review, the bank’s performance in the Boise AA is excellent.

### Lending Activity

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

Key’s lending activity is adequate in the Boise AA, especially considering the strong level of competition in the market. Key ranks third in deposits among 21 depository institutions and has an 8.3 percent

share of the market according to June 30, 2007, FDIC deposit data. But, with nearly 350 lenders operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Key has been active in home purchase, home improvement, home refinance, and small business lending. Some small loans to farms have also been generated. As an insignificant number of multifamily loans were made during the period, no analyses were performed on that product line for this AA. According to 2006 aggregate CRA and HMDA data, Key is ranked ninth in volume of originated/purchased home improvement loans with a 3 percent market share. Key is ranked 14<sup>th</sup> in volume of small business lending with a 1.4 percent share. Key's home purchase and home refinance rankings are low, with less than one percent market shares.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is good in Idaho. This is primarily based on an overall good distribution record within the Boise full-scope AA.

#### ***Home Mortgage Loans***

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

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of the Boise AA is very small. Less than one percent of the housing units are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods.

The geographic distribution of home purchase loans is good. The percentage of Key's loans in moderate-income geographies exceeds the percentage of owner-occupied housing units located in those areas. Key made no loans in the low-income portions of the AA during the period. However, when considering the few opportunities to lend this is not considered a significant factor. Key's home purchase market share in 2006 was too small for meaningful analysis.

The geographic distribution of home improvement loans is excellent. The percentage of Key's loans in low-income geographies significantly exceeds the percentage of owner-occupied housing units located in those areas. Also, Key's 2006 market share in low-income areas significantly exceeded its overall home improvement market share in Boise. However, Key's strong performance in the low-income areas is not represented by very many loans. In moderate-income areas, the percentage of loans is substantially near the percentage of owner-occupied housing units in that segment of the AA. Key's moderate-income market share was below its overall home improvement share.

The geographic distribution of home refinance loans is adequate. The percentage of Key's loans in low-income geographies exceeds the percentage of owner-occupied housing units located in those areas. The percentage of loans in moderate-income areas is well below the percentage of owner-occupied housing units in moderate-income areas. Performance is strong in the low-income areas and weak in the moderate-income areas. Key's 2006 home refinance market share in Boise was too small for meaningful analysis.

#### ***Small Loans to Businesses***

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

In evaluating the geographic distribution of small loans to businesses, we considered that the number of businesses located in the low-income neighborhoods of the AA is very small. Less than one percent of businesses are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods.

The geographic distribution of small loans to businesses is excellent. The percentage of Key's loans in low-income geographies significantly exceeds the percentages of businesses located in those segments of the AA. The percentage of lending in moderate-income areas exceeds the percentage of businesses located there. Key's 2006 small business market share in low-income areas exceeded its overall small business market share in Boise, and significantly exceeded its share in moderate-income areas.

### ***Small Loans to Farms***

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

In evaluating the geographic distribution of small loans to farms, we considered that the number of farms located in the low-income neighborhoods of the AA is very small. Less than one percent of farms are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods.

The geographic distribution of small loans to farms is excellent, based primarily on performance in moderate-income areas. The percentage of Key's loans in moderate-income geographies significantly exceeds the percentage of farms located in those segments of the AA. Key's 2006 market share in moderate-income areas significantly exceeded its overall share of the farm loan market. Key made no small loans to farms in low-income areas during the period; however, there are very limited opportunities to lend in low-income geographies since only .63 percent of farms are located there.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is excellent in Idaho. This is primarily based on an excellent distribution record within the Boise full-scope AA.

### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentages of loans to low-income and moderate-income borrowers significantly exceed the percentages of low-income and moderate-income families within the AA. Key's 2006 home purchase market shares were too small for meaningful analyses.

The borrower distribution of home improvement loans is excellent overall. While the percentage of loans made to low-income borrowers is below the percentage of low-income borrowers, performance is considered good considering the impact that the area's poverty level has on lending to the low-income

segment of the community. In 2006, Key's market share of lending to low-income borrowers was double its overall home-improvement market share in Boise. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income borrowers in the AA. Key's 2006 market share to moderate-income borrowers was near its overall home improvement market share in the AA.

The borrower distribution of home refinance loans is adequate. While the percentage of loans made to low-income borrowers is well below the percentage of low-income borrowers, performance is considered adequate considering the impact that the area's poverty level has on lending to the low-income segment of the community and the number of loans involved. The percentage of loans to moderate-income borrowers is below the percentage of moderate-income borrowers in the AA. Key's 2006 home refinance market shares were too small for meaningful analyses.

### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is excellent. The percentage of loans to businesses with revenues of \$1 million or less approximates the percentage of small businesses within the AA. Key's 2006 market share of small loans to businesses significantly exceeds its overall small business market share in this AA.

### ***Small Loans to Farms***

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

The borrower distribution of small loans to farms is excellent. The percentage of loans to farms with revenues of \$1 million or less exceeds the percentage of small businesses within the AA. Key's 2006 market share of small loans to farms significantly exceeds its overall small business market share in this AA.

### **Community Development Lending**

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

Community development lending had a positive impact on the Lending Test rating for Idaho. The bank's record of originating community development loans is excellent in the Boise AA. During the evaluation period Key generated 8 CD loans totaling \$628 thousand in the area. The CD loans reflect a variety of community development purposes such as affordable housing and activities that revitalize/stabilize low-and moderate-income geographies. For example, one Key loan helped finance a New Market Tax Credit project for revitalizing and stabilizing a local downtown area. The bank also originated a \$2.3 million loan for the purpose of financing a 36-unit affordable multifamily housing complex for low- and moderate-income individuals using Low Income Housing Tax Credits.

### Additional CD Loan Activity

Consideration was given to three additional CD loans the bank made totaling \$5.2 million within the State of Idaho but not located within any of the bank's AAs. While having the potential to benefit one or more of the bank's AAs, these additional CD loans did not impact the overall state rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Pocatello AA is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Idaho. Performance in the Idaho Falls and Idaho's non-MSA AAs is weaker than the bank's overall Lending Test performance in the state. In the non-MSA AA, weaker performance is due to weaker geographic and borrower distribution performance and relatively lower levels of CD lending activity. In the Idaho Falls AA the bank demonstrated weaker borrower distribution performance and relatively lower levels of CD lending. The results of the limited-scope reviews did not impact the overall Lending Test rating for Idaho. Refer to the Tables 1 through 12 in the state of Idaho section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Idaho is rated "Low Satisfactory." Based on a full-scope review, performance in the Boise AA is adequate.

Key's investments in the Boise full-scope AA consisted of \$51 thousand in prior and current evaluation period investments in funds that provide capital to small businesses as well as donations of \$95 thousand to a variety of organizations that provide affordable housing and community services. While this level of investments is very low, we did consider the limited LIHTC investment opportunities within the Boise area and state of Idaho. While Key demonstrated responsiveness by bidding on these investments, a majority of tax credits were allocated to projects within a small group of developers with relationships with other syndicators. We also considered the bank's adequate investment performance in the non-metropolitan assessment area, the limited investment opportunities in Key's assessment areas within the state, the bank's limited investment authority, as well as the bank's strong lending record in the state. These factors had a positive impact on overall adequate rating in the full-scope area as well as the overall Investment Test rating for the State of Idaho. The bank's performance in the State of Idaho was not impacted by investments made in the in the broader state/regional area or performance in the remaining limited-scope areas.

During the evaluation period, Key originated 31 investments and donations in the Boise AA totaling \$132 thousand. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on three prior period investments as of June 30, 2008, was \$14 thousand.

The bank also made investments in funds throughout the State of Idaho and 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 the broader statewide or regional area. Key made one statewide investment totaling \$375 thousand in the current evaluation period. Refer to Table 14 in the State of Idaho section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area. These additional investments did not impact the bank's overall performance under the State of Idaho.

## **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the non-metropolitan AA is not inconsistent with the bank's overall Low Satisfactory performance in the State of Idaho. The bank's performance in the non-metropolitan area is considered adequate. Performance in the Idaho Falls and Pocatello AAs is weaker than the overall performance in the state, due to a lower level of investments. Performance in the limited-scope assessment areas other than the non-metropolitan area did not impact the State of Idaho Investment Test rating. Refer to the Table 14 in the State of Idaho section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Idaho is rated "Outstanding." Performance in the Boise AA is excellent.

### **Retail Banking Services**

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

The distribution of bank branches is excellent in the Boise AA as they are readily accessible to all portions of the full-scope area. The percentage of bank branches located in moderate-income geographies significantly exceeds the percentage of the population residing in those geographies. While the bank does not have a branch located in a low-income geography, only 1.57 percent of the Boise population resides in low-income geographies. The accessibility of bank ATMs in moderate-income Boise geographies is also excellent. The bank does not have ATMs located in low-income geographies. During the evaluation period the bank opened one branch in an upper-income geography. During the same period, the bank did not close any branches.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portion of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

### **Community Development Services**

Bank employees provided an excellent level of community development services to the Boise AA. Five employees provided over 2,260 hours of financial guidance to a number of organizations serving the community development needs of low-and moderate-income residents and geographies in the Boise community. The services the community development organizations provide address the community's needs including economic revitalization and affordable housing.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Idaho Falls, Pocatello, and non-MSA AAs is not inconsistent with the bank's Outstanding performance in the State of Idaho.

## State of Indiana

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

The major factors that support this rating include:

- The geographic distribution of Key's lending is adequate.
- The borrower distribution of Key's lending is good.
- Community development lending activity has been substantial. Excellent CD lending performance had a positive impact on the Lending Test rating for Indiana.
- The bank made a good volume of community development investments in the Indianapolis AA, however weaker performance in the limited-scope areas had an adverse impact on the Investment Test rating.
- The bank's distribution of branches and ATMs in the Indianapolis AA is poor; however, the bank provided a good level of community development services in the Indianapolis AA. The bank's stronger performance in the majority of limited-scope AAs, representing 59 percent of the bank's deposits in the state had a positive impact on the bank's overall Service Test rating for the state.

## Description of Institution's Operations in Indiana

Key operates 65 branches and 79 deposit-taking ATMs in the State of Indiana. These branches represent 6.4 percent of the bank's total branch network. The bank's assessment areas in the state include 6 MSAs or portions of MSAs and 5 entire counties that comprise the combined non-metropolitan assessment area. The Indianapolis MSA was selected for full-scope review due to its high concentration of deposits (40.7 percent), reported loans (51.2 percent), branches (36.9 percent), and investments (60.8 percent) within the state. The concentration of deposits in the Indianapolis MSA far exceeds the South Bend MSA which is the next largest assessment area in terms of deposits with 21.3 percent of Key's deposits in the state. The remaining assessment areas, including the combined non-metropolitan areas were analyzed using limited-scope procedures. Deposits in Indiana represent only 4.5 percent of the bank's total deposits. As such, performance in this rating area did not have a significant impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

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

### Lending Activity

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

Key's lending activity is adequate in the Indianapolis AA, especially considering the strong level of competition in the market. Key ranks sixth in deposits among 47 depository institutions and has a 4.6 percent share of the market according to June 30, 2007, FDIC deposit data. But, with over 500 lenders operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Key's primary lending activity has been small loans to businesses and home improvement loans, although the bank has also originated/purchased home purchase, home improvement and some small loans to farms. An insignificant number of multifamily loans were made during the period, so no analyses were performed on that loan type for this AA.

According to 2006 aggregate CRA data, Key is ranked 18<sup>th</sup> in volume of originated/purchased small loans to businesses with a market share of less than one percent. According to 2006 aggregate HMDA data, Key is ranked 10<sup>th</sup> with a 3.9 percent share for home improvement lending. For home purchase and home refinance loans, Key is ranked low with market shares of less than one half of one percent.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is adequate in Indiana. This is primarily based on an overall adequate distribution record within the Indianapolis full-scope AA.

#### ***Home Mortgage Loans***

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

The geographic distribution of home purchase loans is good. The percentage of Key's loans in low-income geographies significantly exceeds the percentage of owner-occupied housing units located in those areas, although the bank's performance in the low-income areas is not represented by a significant number of loans. Performance in moderate-income geographies is adequate as the percentage of loans in moderate-income areas is well below the percentage of owner-occupied housing units located in that segment of the AA. Key's home purchase market share in 2006 was too small for meaningful analysis.

The geographic distribution of home improvement loans is adequate. The percentage of loans in moderate-income areas is below the percentage of owner-occupied housing units in those segments of the community. Key's 2006 market share in moderate-income areas was near its overall home improvement market share for the AA. The percentage of loans in low-income areas is well below the percentage of owner-occupied housing units located in that segment of the community. However, performance is adequate as lending opportunities are limited since only 3.35 percent of owner-occupied units are available in these geographies. Key's 2006 market share in low-income areas was near its overall home improvement market share for the AA.

The geographic distribution of home refinance loans is poor. The percentage of Key's loans in moderate-income geographies is significantly below the percentage of owner-occupied housing units located in those areas. While the percentage of loans in low-income areas is well below the percentage of owner-occupied housing units in that segment of the market, low-income performance is considered adequate due to the limited lending opportunities presented by a small percentage (3.35 percent) in the geography. Key's 2006 home refinance market was too small for meaningful analysis.

### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is adequate. The percentage of Key's loans in moderate-income geographies is below the percentage of businesses located in that segment of the AA. While the percentage of loans in low-income geographies is well below the percentage of businesses in that segment of the AA; however, limited lending opportunities are available due to the small percentage of businesses (4.32 percent) located in low-income geographies. Key's 2006 small business market share was too small for meaningful analyses.

### ***Small Loans to Farms***

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

The geographic distribution of small loans to farms is considered poor. Key originated/purchased no small loans to farms in either low-income or moderate-income areas during the evaluation period and made only 32 small loans to farms overall in the AA. However this is not considered a material negative factor due to somewhat limited opportunities for the bank to lend. Less than two percent of the AA's farms are located in low-income areas, and less than 10 percent are located in moderate-income areas.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in Indiana. This is primarily based on a good distribution record within the Indianapolis full-scope AA.

### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentages of loans to low-income borrowers and moderate-income borrowers significantly exceed the percentages of low-income and moderate-income families within the AA. Key's 2006 home purchase market shares were too small for meaningful analyses.

The borrower distribution of home improvement loans is good overall. The percentage of lending to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. Key's 2006 moderate-income market share exceeded its overall home improvement share in the AA. While the percentage of loans made to low-income borrowers is below the percentage of low-income families, performance is considered adequate when considering the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 low-income borrower market share was well below its overall home improvement market share for the AA.

The borrower distribution of home refinance loans is excellent overall. The percentage of lending to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is below percentage of low-income families in the AA, performance is considered good in this sector when considering the impact that the area's poverty level has on lending to low-income borrowers. Key's 2006 home refinance market share was too small for meaningful analysis.

### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of small businesses within the AA. Key's 2006 market share of small loans to businesses is too small for meaningful analysis.

### ***Small Loans to Farms***

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

The borrower distribution of small loans to farms is adequate. The percentage of loans to farms with revenues of \$1 million or less is below the percentage of small businesses within the AA. Key's 2006 market share of small loans to farms exceeded its overall farm lending market share in the AA.

### **Community Development Lending**

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

Community development lending had a positive impact on the Lending Test rating for Indiana. The bank's record of originating community development loans is excellent in the Indianapolis AA. During the evaluation period Key generated nine CD loans totaling \$64.4 million in the area, which represents 51.2 percent of allocated Tier I capital.

The CD loans reflect a variety of community development purposes such as affordable housing, activities that revitalize/stabilize low-and moderate-income geographies, and funding for organizations providing community services targeted to low-and moderate-income individuals and families. For example, Key originated two loans totaling \$1.3 million to an organization that has a mission to develop plans to address the housing needs of the area's low-and moderate-income area.

#### **Additional CD Loan Activity**

Consideration was given to nine additional CD loans the bank made totaling \$20.3 million within the State of Indiana but not located within any of the bank's AAs. While having the potential to benefit one or more of the bank's AAs, these additional CD loans did not impact the overall state rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bloomington, Elkhart, Kokomo, and South Bend AAs is not inconsistent with the bank's overall High Satisfactory performance under the Lending Test in Indiana. Performance in the Anderson and Indiana non-MSA AAs is considered stronger than the bank's overall Lending Test performance in the state. Performance is stronger in both areas due to stronger geographic and borrower distribution records. The results of the limited-scope review did not impact the Lending Test rating for Indiana. Refer to the Tables 1 through 12 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Indiana is rated "Low Satisfactory." Based on a full-scope review, performance in the Indianapolis AA is good. However, weaker performance in limited-scope AAs had an adverse impact on the state Investment Test rating. The bank's performance in the State of Indiana was not impacted by investments made in the in the broader state/regional area. Key's responsiveness to the identified needs of the assessment area is good, especially in the area of affordable housing.

During the evaluation period, Key originated 21 investments and donations in the Indianapolis assessment area totaling \$3.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on 39 prior period investments as of June 30, 2008, was \$2.5 million.

The bank also made investments in funds throughout the State of Indiana and 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 the broader statewide or regional area. Key did not make any statewide investments in the current evaluation period; however, 15 statewide investments with remaining balances of \$821 thousand were made in prior periods. Refer to Table 14 in the State of Indiana section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area. These additional investments did not impact the bank's overall performance under the State of Indiana.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the Bloomington AA is stronger than the bank's overall Low Satisfactory performance in the State of Indiana. Stronger performance is due to the ongoing impact of a significant prior a period investment that addressed an affordable housing need. The bank's performance in the Anderson and Elkhart AAs is not inconsistent with the bank's overall adequate performance. Performance in the Kokomo, South Bend, and non-metropolitan AAs is weaker than the overall performance in the state, due to a lower level of investments. Performance in the limited-scope assessment areas had a negative impact on the State of Indiana Investment Test rating, due to weaker performance in a majority of these areas. Refer to the Table 14 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Indiana is rated "Low Satisfactory." Based on a full-scope review, performance in the Indianapolis AA is poor. As discussed at the end of this section, the bank's performance in the South Bend limited-scope AA had a positive impact on the Service Test rating for the State of Indiana.

### **Retail Banking Services**

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

The distribution of bank branches is poor in the Indianapolis AA, as they are not generally accessible to all portions of the full-scope area. The percentage of bank branches located in low-income geographies is near to the percentage of the population residing in those geographies. In moderate-income geographies, the percentage of bank branches is significantly below the population percentage. The accessibility of bank ATMs to residents in low-income Indianapolis geographies is adequate. The accessibility of bank ATMs to residents in moderate-income Indianapolis geographies is poor. During the evaluation period the bank opened two branches. During the same period, the bank closed one branch. The result of combined branch openings and closings was the addition of one branch in an upper-income geography. The branch closing did not adversely impact the accessibility of banking services in low-and moderate-income Indianapolis AA geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

### **Community Development Services**

Bank employees provided a good level of community development services to the Indianapolis AA. Thirteen employees provided over 1000 hours of financial guidance to a number of organizations serving the community development needs of low-and moderate-income residents and geographies areas in the Indianapolis community. The services the community development organizations provide address the community's needs including economic revitalization, affordable housing, and services for low-and moderate-income individuals and families.

The bank sponsored a Super Refund Saturday event in its Indianapolis AA in 2008 to facilitate access to the Earned Income Tax Credit (EITC). The bank collaborated with non-profit organizations to publicize the EITC and free tax preparation primarily for low- and moderate-income individuals. And bank employees provided expertise through their participation in the tax preparation process. For 2008, the event resulted in the preparation of 119 tax returns representing \$261 thousand in tax refunds.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in the limited-scope South Bend, Elkhart, non-MSA, Kokomo, and Anderson AAs is stronger than the bank's low-satisfactory performance for the State of Indiana.

The bank's overall stronger performance in the South Bend, Elkhart, non-MSA, Kokomo and Anderson AAs is the result of excellent accessibility of the bank's branch facilities to the portion of the population residing in low-and moderate-income geographies. The difference in performance in these limited-scope AAs had a positive impact on the bank's overall Service Test performance in the State of Indiana. The bank derives approximately 59 percent of its deposits in the state from these AAs. The bank's performance in the Bloomington AA is not inconsistent with the bank's performance in the full-state.

## State of Maine

<b>CRA Rating for Maine:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- The geographic distribution of Key's lending is excellent.
- The borrower distribution of Key's lending is good.
- Community development lending activity has been substantial. Excellent CD lending performance had a positive impact on the Lending Test rating for the Portland AA.
- The bank had an excellent volume of community development investments that addressed the need for affordable housing.
- The bank's distribution of branches and ATMs in the Portland AA is excellent.
- The bank provided an excellent level of community development services in the Portland AA.

## Description of Institution's Operations in Maine

Key operates 64 branches and 80 deposit-taking ATMs in the State of Maine. These branches represent 6.3 percent of the bank's total branch network. The bank's assessment areas in the state include 3 MSAs and 10 entire counties that comprise the combined non-metropolitan assessment area. The Portland MSA was selected for full-scope review due to its high concentration of deposits (58 percent), reported loans (37.2 percent), and branches (40.6 percent) within the state. The concentration of deposits in the Portland MSA far exceeds the non-metropolitan assessment area which is the next largest assessment area in terms of deposits with 31.5 percent of Key's deposits in the state. The remaining assessment areas, including the combined non-metropolitan areas were analyzed using limited-scope procedures. Deposits in Maine represent only 4.5 percent of the bank's total deposits. As such, performance in this rating area did not have a significant impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Maine is rated "Outstanding." Based on a full-scope review, the bank's performance in the Portland AA is excellent.

### Lending Activity

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

Key's lending activity is adequate in the Portland AA, especially considering the strong level of competition in the market. Key ranks second in deposits among 23 depository institutions and has a 17

percent share of the market according to June 30, 2007, FDIC deposit data. But, with over 300 lenders operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Key has been active in home purchase, home improvement, home refinance, and small business lending. As an insignificant number of multifamily loans and small loans to farms were made during the period, no analyses were performed on those loan types for this AA. According to 2006 aggregate CRA and HMDA data, Key is ranked 11<sup>th</sup> in volume of originated/purchased home improvement loans with a 2.5 percent market share. Key is ranked 15<sup>th</sup> in volume of small business lending with a 1.3 percent share. Key is ranked 25<sup>th</sup> in home refinance lending with a 1.2 percent market share. For home purchase lending, Key is ranked 46<sup>th</sup> with less than one half of one percent market share.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is excellent in Maine. This is primarily based on an overall excellent distribution record within the Portland full-scope AA.

#### ***Home Mortgage Loans***

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

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of the Portland AA is very small. Less than one third of one percent of the housing units are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods. The geographic distribution of home purchase loans is excellent. The percentage of Key's loans in low-income geographies significantly exceeds the percentage of owner-occupied housing units located in those areas. However, the bank's performance is represented by few loans due to the few opportunities to lend in low-income areas. The percentage of loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in that segment of the AA. Key's home purchase market share in 2006 was too small for meaningful analysis.

The geographic distribution of home improvement loans is excellent. The percentage of Key's loans in low-income geographies significantly exceeds the percentage of owner-occupied housing units located in those areas. However, the bank's performance is represented by few loans due to the few opportunities to lend in low-income areas. Key made no home improvement loans in low-income areas during 2006 so had no share of that limited market that year. The percentage of loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in that segment of the AA. Key's 2006 home improvement market share in moderate-income areas exceeded its overall home improvement market share in Portland.

The geographic distribution of home refinance loans is excellent, based primarily on performance in moderate-income areas. The percentage of Key's loans in moderate-income geographies exceeds the percentage of owner-occupied housing units located in those areas. While the percentage of loans in low-income areas is well below the percentage of owner-occupied housing units in that segment of the market, the opportunities to lend are few as only .32 percent of owner-occupied units are located in low-income geographies. Key's 2006 home refinance market share in Portland was too small for meaningful analysis.

### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is excellent, based primarily on performance in moderate-income areas, as there are more than eight times as many businesses located in moderate-income areas than in low-income areas. Less than two percent of businesses are located in low-income portions of the AA. The percentage of Key's loans in moderate-income geographies exceeds the percentage of businesses located in that segment of the AA. Key's 2006 small business market share in moderate-income areas significantly exceeded its overall small business market share in Portland. The percentage of lending in low-income areas is adequate, as the percentage of loans made in those neighborhoods is below the percentage of businesses located there. Key's 2006 small business market share in low-income areas was well below its overall small business market share in Portland.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in Maine. This is primarily based on a good distribution record within the Portland full-scope AA.

### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home purchase loans to borrowers of different income levels is good overall. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families within the AA. While the percentage of loans to low-income borrowers is well below the percentage of families in that segment of the AA, performance is considered adequate considering the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home purchase market shares were too small for meaningful analyses.

The borrower distribution of home improvement loans is excellent overall. While the percentage of loans made to low-income borrowers is lower than the percentage of low-income families, performance is considered good considering the impact that the area's poverty level has on lending to the low-income segment of the community. And, Key's 2006 market share of lending to low-income borrowers significantly exceeded its overall home improvement market share for the area. The percentage of lending to moderate-income borrowers exceeds the percentage of moderate-income families; while Key's moderate-income market share significantly exceeded its overall share of the market.

The borrower distribution of home refinance loans is excellent overall. While the percentage of loans made to low-income borrowers is lower than the percentage of low-income families, performance is considered good in this segment considering the impact that the area's poverty level has on lending to the low-income segment of the community. And, Key's 2006 market share of lending to low-income borrowers significantly exceeded its overall home refinance market share for the area. The percentage

of lending to moderate-income borrowers significantly exceeds the percentage of moderate-income families, while Key's moderate-income market share exceeded its overall share of the market.

### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of small businesses within the AA. Key's 2006 market share of small loans to businesses significantly exceeds its overall small business market share in this AA.

### **Community Development Lending**

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

Community development lending had a positive impact on the Lending Test rating for Maine. The bank's record of originating community development loans is excellent in the Portland AA. During the evaluation period Key generated 20 CD loans totaling \$89.7 million in the area. The CD loans reflect a variety of community development purposes such as affordable housing, activities that revitalize/stabilize low-and moderate-income geographies, and funding for organizations providing community services targeted to low-and moderate-income individuals and families. For example, Key originated a series of 11 loans totaling \$41.9 million to a community development service organization that provides health services targeted to low- and moderate-income individuals, families, schools, and communities.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lewiston AA is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Maine, as CD lending is significant. Performance in the Bangor and Maine's non-MSA AAs is weaker than the bank's overall Lending Test performance in the state. In both areas, relative CD lending levels are not as high, and geographic distribution performance is weaker. It is noted that those areas do have a somewhat stronger borrower distribution record. The results of the limited-scope reviews did not impact the overall Lending Test rating for Maine. Refer to the Tables 1 through 12 in the state of Maine section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Maine is rated "Outstanding." Based on a full-scope review, performance in the Portland AA is excellent. The bank's performance in the State of Maine was not impacted by investments made in the in the broader regional area. Key's responsiveness to the identified needs of the assessment area is excellent, especially in the area of affordable housing.

During the evaluation period, Key originated 19 investments and donations in the Portland AA totaling \$11.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on 40 prior period investments as of June 30, 2008, was \$5.8 million.

Consideration was 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 the broader regional area. Refer to Table 14 in the State of Maine section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area. These additional investments did not impact the bank's overall Outstanding performance under the State of Maine.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the Bangor, Lewiston, and non-metropolitan AAs is weaker than the bank's overall Outstanding performance in the State of Maine due to a lower level of investments. While weaker than the overall performance in the state, the bank's performance Lewiston area is considered good and performance in the Bangor and non-metropolitan AA is adequate. Performance in the limited-scope assessment areas did not impact the State of Maine Investment Test rating as the rating was influenced primarily by the performance in the Denver Portland full-scope AA. Refer to the Table 14 in the State of Maine section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Maine is rated "Outstanding." Performance in the Portland AA is excellent.

### **Retail Banking Services**

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

The distribution of bank branches is excellent in the Portland AA, as they are readily accessible to all portions of the full-scope area. The percentage of bank branches located in moderate-income geographies is substantially the same as the percentage of the population residing in those geographies. While the bank does not have a branch located in a low-income geography, only 1.33 percent of the Portland population resides in low-income geographies. Similarly, of all Portland AA businesses less than 2 percent are located in low-income geographies. Access to banking services in low-income areas is augmented by two deposit-taking ATMs located in low-income geographies. During the evaluation period the bank opened one branch in a middle-income geography. During the same period, the bank closed one branch in a moderate-income geography. The branch closing was a consolidation of a satellite office. The branch closing did not adversely impact the accessibility of banking services in low-and moderate-income Portland AA geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

The bank designated a majority of its Portland AA branches as KeyBank Plus program branches that offer affordable check cashing for non-depository clients. In addition to fees that are well below those

of check cashing companies, participants receive up to five free money orders per visit which facilitates bill payments.

### **Community Development Services**

Bank employees provided an excellent level of community development services to the Portland AA. Seventeen employees provided over 2,400 hours of financial guidance to several organizations serving the community development needs of low-and moderate-income residents and geographies in the Portland community. The services the community development organizations provide address community needs, including affordable housing, economic revitalization, and services for low-and moderate-income individuals and families.

Bank employees provided technical assistance to the Portland community by submitting Affordable Housing Program applications to the Cincinnati Federal Home Loan Bank. Specifically, the bank assisted in filing one application which totaled \$800 thousand.

The bank sponsored a Super Refund Saturday event in its Portland AA in 2008 to facilitate access to the Earned Income Tax Credit (EITC). The bank collaborated with non-profit organizations to publicize the EITC and free tax preparation primarily for low- and moderate-income individuals. Bank employees provided expertise through their participation in the tax preparation process. For 2008, the event resulted in the preparation of 83 tax returns representing \$173 thousand in tax refunds.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in the limited-scope non-MSA and Lewiston AAs is not inconsistent with the Outstanding performance in the State of Maine. The bank's performance under the Service Test in the Bangor AA is weaker than the bank's overall excellent performance due to good rather than excellent accessibility of the bank's branch facilities to the portion of the population residing in low-and moderate-income geographies. The difference in performance in the limited-scope Bangor AA did not impact the bank's overall performance in the State of Maine.

## State of Michigan

<b>CRA Rating for Michigan:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- The geographic distribution of Key's lending is good in Michigan. This is based on excellent performance in the Wayne County AA and adequate performance in the Oakland-Macomb AA.
- The borrower distribution of loans is good in both the Oakland-Macomb and Wayne County AAs
- Community development lending activity has been substantial. Performance has been excellent in both the Oakland-Macomb and Wayne County AAs. CD lending had the impact of raising the Lending Test rating for the state of Michigan.
- The bank had an excellent volume of community development investments that addressed the need for affordable housing and projects that revitalize or stabilize low- and moderate-income areas.
- The bank's distribution of branches and ATMs in Oakland-Macomb AA is excellent, however the bank's distribution of branches and ATMs in the Wayne County AA is poor. Stronger performance in the limited-scope Ann Arbor AA had a positive impact on the Service Test rating.

## Description of Institution's Operations in Michigan

Key operates 35 branches and 34 deposit-taking ATMs in the State of Michigan. These branches represent 3.5 percent of the bank's total branch network. The bank's assessment areas in the state include the Ann Arbor MSA, the Monroe MSA, the Wayne County- Metropolitan Division of the Detroit MSA, the Oakland-Macomb-Livingston county portion of the Detroit MSA's second Metropolitan Division, and 2 other entire counties that comprise the combined non-metropolitan assessment area. The Wayne County AA which includes the City of Detroit was selected for full-scope review as the bank added the AA to its market area since the last performance evaluation. The AA had a high concentration of reported loans (31 percent) within the state. The Oakland- Macomb AA was also selected for full-scope review due to its high concentration of reported loans (32.9 percent), branches (28.6 percent) and to a lesser degree its concentration of deposits (10.7 percent) within the state. Furthermore, the Wayne County MD and the Oakland-Macomb-Livingston MD are interrelated segments of the Detroit MSA. While the concentration of deposits in the Ann Arbor MSA is significantly higher (62.9 percent) than the Oakland- Macomb and Wayne County MSAs, Key also had significantly less lending activity in the Ann Arbor AA which also has a smaller percentage of low- and moderate-income geographies. The remaining assessment areas, including the combined non-metropolitan areas, were analyzed using limited-scope procedures. Deposits in Michigan represent 2.5 percent of the bank's total deposits. As such, performance in this rating area did not have a significant impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in State of Michigan is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Wayne County AA is excellent and good in the Oakland-Macomb AA.

### Lending Activity

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

Key's lending activity is adequate in the Oakland-Macomb and Wayne County AAs, especially considering the strong level of competition in those markets.

In the Oakland-Macomb AA, Key ranks 25<sup>th</sup> in deposits among 46 depository institutions with a 0.28 percent of the market according to June 30, 2007, FDIC deposit data. In the Wayne County AA, Key ranks 17<sup>th</sup> in deposits among 29 depository institutions, also having a 0.28 percent share of the market. But, with nearly 600 lenders operating in the Oakland-Macomb AA and nearly 500 operating in the Wayne County AA, the majority of which are not depository institutions, Key's lending market shares are lower than its deposit shares.

Key's primary lending product in the Oakland-Macomb and Wayne County AAs is home improvement loans, while also making some small loans to businesses, home refinance, and home purchase lending. As no small loans to farms and an insignificant number of multifamily loans were originated/purchased during the evaluation period, no analyses were done on those loan types.

In the Oakland-Macomb AA, 2006 aggregate HMDA reflects that Key is ranked sixth in volume of originated/purchased home improvement loans with a 3.1 percent market share. Key was ranked low with market shares of less than one tenth of one percent for home purchase and home improvement loans. Aggregate 2006 CRA data reflects that Key's small business lending rank was also low with a market share of less than one tenth of one percent.

In the Wayne County AA, 2006 aggregate HMDA reflects that Key is ranked fifth in volume of originated/purchased home improvement loans with a 4.7 percent market share. Key was ranked low with market shares of less than one tenth of one percent for both home purchase and home refinance lending. Aggregate 2006 CRA data reflects that Key's small business lending rank was also low with a market share of less than a quarter of one percent.

### Distribution of Loans by Income Level of the Geography

The geographic distribution of Key's loans is good in Michigan. This is primarily based on excellent performance in the Wayne County AA and adequate performance in the Oakland-Macomb AA.

### Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases. As the level of Key's multifamily lending is very low in both the Wayne County and Oakland-Macomb AAs, no analyses were performed for that loan type.

In evaluating the geographic distribution of home mortgage loans in the Oakland-Macomb AA, we considered that the number of owner-occupied housing units located in the low-income neighborhoods is very small. Less than one percent of the housing units are located in those segments of each of those communities. This has an impact on the opportunity to lend in the low-income neighborhoods.

#### Oakland-Macomb Assessment Area

The geographic distributions of home improvement and home refinance loans are adequate, based primarily on performance in the moderate-income sections of the AA while the geographic distribution of home purchase loans is poor.

The percentage of Key's home purchase loans in moderate-income geographies is well below the percentage of owner-occupied housing units that are located in that segment of the AA. Key made no loans in the low-income areas during the evaluation period. However, with the opportunity to lend being very limited due to few owner-occupied housing units in the low-income parts of the AA, the lack of lending activity is not a significant factor. Key's home purchase market share was too small in 2006 for meaningful analysis.

The percentage of Key's home improvement loans in moderate-income geographies is below the percentages of owner-occupied housing units that are located in those segments of the AA. Key's 2006 market share of lending in the moderate-income areas is near its overall home improvement market share in the AA. The percentage of loans in low-income areas is well below the percentage of owner-occupied housing units located in that segment of the market, and Key's low-income market share was well below its overall home improvement market share. However, the opportunity to lend in low-income areas is limited.

The percentage of Key's home refinance loans in low-income areas significantly exceeds the percentage of owner-occupied housing units located in that segment of the AA. In the moderate-income areas, the percentage of loans is well below the percentage of owner-occupied housing units located in those neighborhoods. However, with the limited volume of loans Key made, the differences between strong, adequate, and weak performance is represented by few loans. Key's home refinance market share was too small in 2006 for meaningful analysis.

#### Wayne County Assessment Area

The geographic distribution of home improvement loans is excellent, while the distribution of home refinance loans is good. The number of home purchase loans was too small for meaningful analysis. The percentages of Key's home improvement loans in low-income and moderate-income geographies exceed the percentages of owner-occupied housing units that are located in those segments of the AA. And, Key's 2006 market shares in low-income and moderate-income areas significantly exceeded the bank's overall home improvement market share within the Wayne County AA.

The percentage of Key's home refinance loans in moderate-income areas exceeds the percentage of owner-occupied housing units located in that segment of the AA. In the low-income areas, the percentage of loans is well below the percentage of owner-occupied housing units located in those neighborhoods. However, opportunities to lend are limited as only 3.81 percent of owner-occupied units are located in low-income geographies. Key's home refinance market share was too small in 2006 for meaningful analysis.

#### ***Small Loans to Businesses***

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

Oakland-Macomb Assessment Area

The geographic distribution of small loans to businesses is good in the Oakland-Macomb AA. The percentage of Key's loans in low-income areas significantly exceeds the percentage of businesses located in that segment of the AA. In moderate-income areas, the percentage of loans is below the percentage of businesses located in that portion of the AA. Key's 2006 market share of small business lending was too small for meaningful analysis.

Wayne County Assessment Area

The geographic distribution of small loans to businesses is good in the Wayne County AA. The percentage of Key's loans in moderate-income geographies is near the percentage of businesses located in moderate-income segments of the AA. The percentage of Key's loans in low-income areas is below the percentage of businesses located in that portion of the AA. Key's 2006 market share of small business lending was too small for meaningful analysis.

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

The borrower distribution of Key's loans is good in Michigan. This is based on good performance in both the Wayne County and Oakland-Macomb AAs.

***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

Oakland-Macomb Assessment Area

The borrower distribution of home purchase loans is excellent, and the distribution of home improvement and home refinance loans is good.

The percentage of home purchase loans to low-income borrowers significantly exceeds the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the area, although performance is represented by few loans. Key's market shares of home purchase loans were too small in 2006 for meaningful analyses.

The percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. Key's 2006 home improvement market share to moderate-income borrowers was below the bank's overall home improvement market share in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, performance is considered adequate as consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home improvement market share to low-income borrowers exceeded the bank's overall home improvement market share in the AA.

The percentage of home refinance loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, performance is considered good, as consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 market share for home refinance lending was too small for meaningful analysis.

#### Wayne County Assessment Area

The borrower distribution of home improvement and home refinance loans is good. The number of home purchase loans was too small for meaningful analysis.

The percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. Key's 2006 home improvement market share to moderate-income borrowers was below the bank's overall home improvement market share in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, performance is considered adequate as consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home improvement market share to low-income borrowers exceeded the bank's overall home improvement market share in the AA.

The percentage of home refinance loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the area, performance is considered adequate. Consideration is given to the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 market share for home refinance lending was too small for meaningful analysis.

#### ***Small Loans to Businesses***

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

#### Oakland-Macomb Assessment Area

The borrower distribution of small loans to businesses is adequate in the Oakland-Macomb AA. The percentage of loans to businesses with revenues of \$1 million or less is below the percentage of small businesses within the AA. Key's 2006 market share of businesses with revenues of \$1 million or less was too small for meaningful analysis.

#### Wayne County Assessment Area

The borrower distribution of small loans to businesses is good in the Wayne County AA. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of small businesses within the AA. Key's market share of businesses with revenues of \$1 million or less significantly exceeds its overall share of small loans to businesses.

#### **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Michigan section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic

lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending activity is excellent the Oakland-Macomb and Wayne County AAs. CD lending had a significant positive impact on the Lending Test rating in Michigan.

#### Oakland-Macomb Assessment Area

During the evaluation period Key generated 4 CD loans totaling \$4.9 million in the area. The CD loans reflect a variety of community development purposes such as affordable housing and funding for organizations providing community services targeted to low-and moderate-income individuals and families. For example, Key originated a \$2.5 million affordable housing loan for the development of 30 homes on scattered area sites. All homes will be rented to low-income individuals. This development represents the second phase of a 70-unit Low Income Tax Credit project. A community contact identified that there is a need for affordable housing in the area.

#### Wayne County Assessment Area

During the evaluation period Key generated eight CD loans totaling \$5.3 million in the area. The purpose of the loans was primarily to provide affordable housing for low- and moderate-income individuals, including building affordable housing stock within mixed-income subdivisions.

#### Additional CD Loan Activity

Consideration was given to 13 additional CD loans totaling \$86.8 million within the State of Michigan but not located within any of the bank's AAs. These loans have the potential to benefit one or more of the bank's AAs. These additional CD loans did not impact the overall Outstanding state rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Ann Arbor AA is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Michigan. Performance in the Monroe AA and Michigan non-MSA AA is weaker than the bank's overall Lending Test performance in the state. Weaker performance in the Monroe AA is due to a lower relative level of CD lending. In the non-MSA areas, the bank had lower CD lending and a weaker geographic distribution record. The results of the limited-scope reviews did not have a significant impact on the Lending Test rating for Michigan. Refer to the Tables 1 through 12 in the state of Michigan section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Michigan is rated "Outstanding." Based on a full-scope review, performance in the Wayne County and Oakland-Macomb AAs is excellent. The bank's performance in the State of Michigan was not impacted by investments made in the in the broader state/regional area. Key's responsiveness to the identified needs of the assessment area is excellent, especially in the area of affordable housing.

#### Wayne County Assessment Area

During the evaluation period, Key originated 46 investments and donations in the Wayne County AA totaling \$16.5 million. In addition, we considered the ongoing impact that investments made prior to the

current evaluation period had within the assessment area. The remaining balance on 50 prior period investments as of June 30, 2008, was \$2.8 million.

#### Oakland- Macomb Assessment Area

During the evaluation period, Key originated 8 investments and donations in the Oakland- Macomb AA totaling \$870 thousand. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on 8 prior period investments as of June 30, 2008, was \$529 thousand.

The bank also made investments in funds throughout the State of Michigan and 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 the broader statewide or regional area. Key did not make any statewide investments in the current evaluation period; however, 95 statewide investments with remaining balances of \$2.8 million were made in prior periods. Refer to Table 14 in the State of Michigan section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area. While consideration was given to these additional investments, they did not impact the bank's overall Investment Test performance under the State of Michigan.

#### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the non-metropolitan AA is not inconsistent with the bank's overall Outstanding performance in the State of Michigan. The bank's performance in the Ann Arbor and Monroe AAs is weaker than the overall performance in the state, due to a lower level of investments. While weaker than the overall performance in the state, the bank's performance Ann Arbor area is considered good. While performance in the limited-scope assessment areas supported the State of Michigan Investment Test rating, the results did not impact the rating. Refer to the Table 14 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

### **SERVICE TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Michigan is rated "High Satisfactory." Based on full-scope reviews, performance in the Oakland-Macomb AA is excellent; however, performance in the Wayne County AA is poor due to the poor accessibility of branches to low- and moderate-income residents as discussed below. As discussed at the end of this section, the bank's performance in the Ann Arbor limited-scope AA had a positive impact on the Service Test rating for the State of Michigan.

#### **Retail Banking Services**

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

#### Oakland-Macomb Assessment Area

The distribution of bank branches is excellent in the Oakland-Macomb AA, as they are readily accessible to all portions of the full-scope area. The percentage of bank branches located in moderate-income geographies exceeds the percentage of the population residing in those geographies. While the bank does not have a branch located in a low-income geography, only 1.73 percent of the Oakland-Macomb population resides in low-income geographies. Similarly, of all Oakland-Macomb AA businesses just over 2 percent are located in low-income geographies. Overall, the accessibility of

bank branches throughout Oakland-Macomb geographies is excellent. During the evaluation period in the Oakland-Macomb AA, the bank opened one branch in a moderate-income geography. During the same period, the bank did not close any branches. The branch opening positively impacted branch accessibility in moderate-income geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours. In addition to the traditional branches and ATMs, customers may access bank services through a toll-free telephone number. Customers also have 24-hour access to bank services including the ability to apply for financial products.

### Wayne County Assessment Area

The accessibility of the bank's branches in the full-scope Wayne County AA is poor. The bank operates four branch locations within the AA resulting from its 2004 purchase of the branches from Sterling Bank and Trust FSB which established Key's presence in the Detroit market. These branches are located in upper-income geographies and were primarily focused toward Sterling's private banking business. Despite poor accessibility of bank branches to residents in low-and moderate-income Wayne County geographies, Key provides a reasonable level of banking services to these residents in the form of loans for home improvement and refinancing, small loans to businesses, and community development loans through the branches located in surrounding geographies and other delivery channels. The bank also located one of its five Wayne County ATMs in a moderate-income geography. During the evaluation period the bank did not open or close branches within the AA.

The services offered at each branch are generally consistent and branch hours are considered to be convenient.

### **Community Development Services**

Bank employees provided an adequate level of community development services overall. In the Wayne County AA, four employees provided 240 hours of financial guidance to organizations serving the community development needs of low-and moderate-income residents and geographies in the Wayne City community. The services the community development organizations provide address the community's needs including economic revitalization and services for low-and moderate-income individuals and families. The bank did not provide CD services in the Oakland-Macomb AA.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in the Ann Arbor AA is stronger than the overall performance in full-scope AAs. This stronger performance reflects good accessibility of the bank's branches to the portion of the population residing in low-and moderate-income geographies. Performance in the limited-scope Ann Arbor AA positively impacted the bank's overall performance in the State of Michigan, due to the significance of this AA where the bank derives approximately 63 percent of deposits within the state. Performance in the non-MSA and Monroe AAs is weaker than the overall rating as the bank has no branches in low- and moderate-income geographies; however, only a small portion of the population resides in those geographies.

## State of Oregon

<b>CRA Rating for Oregon:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>High Satisfactory</b>
<b>The service test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- The geographic distribution of Key's lending is good.
- The borrower distribution of Key's lending is good.
- Community development lending activity had a neutral impact on the Lending Test rating for Oregon.
- The volume of community development investments in the full-scope Salem AA is adequate. However, stronger performance in the limited-scope Medford and non-metropolitan AAs had a positive impact on the overall Investment Test rating for the state.
- The bank's distribution of branches in the full-scope Salem AA is adequate. However, better accessibility of branches in low- and moderate-income geographies in the limited-scope AAs had a positive impact on Service Test rating for the state

## Description of Institution's Operations in Oregon

Key operates 30 branches and 45 deposit-taking ATMs in the State of Oregon. These branches represent 3 percent of the bank's total branch network. The bank's assessment areas in the state include four MSAs and three entire counties that comprise the combined non-metropolitan assessment area. The Salem MSA was selected for full-scope review due to its high concentration of deposits (25.2 percent), reported loans (34 percent), and branches (26.7 percent) within the state. The concentration of branches and deposits and in the Salem MSA is similar to those in the Eugene MSA; however the Salem MSA had significantly more reported loans than the Eugene MSA. The remaining assessment areas, including the combined non-metropolitan areas were analyzed using limited-scope procedures. Deposits in Oregon represent only 1.8 percent of the bank's total deposits. As such, performance in this rating area had minimal impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

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

### Lending Activity

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

Key's lending activity is adequate in the Salem AA, especially considering the strong level of competition in the market. Key ranks fifth in deposits among 17 depository institutions and has a 6.7

percent share of the market according to June 30, 2007, FDIC deposit data. But, with over 300 lenders operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Key's primary lending activity has been small loans to businesses, small loans to farms, and home refinance loans, although the bank has also originated/purchased home purchase and home improvement loans. As Key made no multifamily loans during the period, no analyses were performed on that loan type for this AA.

According to 2006 aggregate CRA data, Key is ranked 16<sup>th</sup> in volume of originated/purchased small loans to businesses with a market share of one percent. For small farm loans, Key is ranked fourth with an 11.9 percent share of the market. According to 2006 aggregate HMDA data, Key is ranked eighth with a 3.5 percent share for home improvement lending. For home purchase and home refinance loans, Key is ranked low with market shares of less than one half of one percent.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is good overall in Oregon. This is primarily based on an overall good distribution record within the Salem full-scope AA.

#### ***Home Mortgage Loans***

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

In evaluating the geographic distribution of home mortgage loans in the Salem AA, we considered that the number of owner-occupied housing units located in the low-income neighborhoods is very small. Less than one tenth of one percent of the housing units are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods. Therefore, substantial weight is placed on performance in the moderate-income areas.

The geographic distribution of home purchase loans is excellent. The percentages of Key's loans in low-income and moderate-income geographies significantly exceed the percentages of owner-occupied housing units located in those areas, although the bank's performance in the low-income areas is not represented by many loans. Key's home purchase market share in 2006 was too small for meaningful analysis.

The geographic distribution of home improvement loans is excellent. The percentage of loans in moderate-income areas exceeds the percentage of owner-occupied housing units in that segment of the community. Key's 2006 market share in moderate-income areas significantly exceeded its overall home improvement market share for the AA. While no loans were made in low-income areas during the evaluation period, this is not a significant negative factor given the very limited opportunity to lend in the low-income areas based on the few owner-occupied housing units located there.

The geographic distribution of home refinance loans is excellent. The percentage of Key's loans in moderate-income geographies is very near the percentage of owner-occupied housing units located in those areas. While the percentage of loans in low-income areas is well below the percentage of owner-occupied housing units in that segment of the market this is not a significant negative factor given the very limited opportunity to lend in the low-income areas based on the few owner-occupied housing units located there. Key's 2006 home refinance market was too small for meaningful analysis.

### ***Small Loans to Businesses***

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

In evaluating the geographic distribution of small loans to businesses in the Salem AA, we considered that the number of businesses located in the low-income areas is very small. Only one quarter of one percent of the area's businesses are located in that segment of the community. This has an impact on the opportunity to lend in the low-income neighborhoods. Therefore, substantial weight is placed on performance in the moderate-income areas.

The geographic distribution of small loans to businesses is good. The percentage of Key's loans in moderate-income geographies is near the percentage of businesses located in that segment of the AA. Key's 2006 market share in the moderate-income areas significantly exceeded its overall small business market share within the Salem AA. While the percentage of loans in low-income geographies is well below the percentage of businesses in that segment of the AA, this is not a significant negative factor as the opportunity to lend is so limited in that part of the community. Key had no share of the low-income market in 2006.

### ***Small Loans to Farms***

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

In evaluating the geographic distribution of small loans to farms in the Salem AA, we considered that no farms are located in the low-income areas, and only 8 percent of farms are located in moderate-income areas. Performance is based on the moderate-income areas where the opportunity to lend is somewhat limited.

The geographic distribution of small loans to farms is considered poor, even when considering the degree of lending being evaluated and the opportunities to lend. Key originated/purchased no small loans to farms in moderate-income areas during the evaluation period.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in Oregon. This is primarily based on a good distribution record within the Salem full-scope AA.

### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home purchase loans to borrowers of different income levels is good overall. The percentage of loans to moderate-income borrowers significantly exceeds the percentages of moderate-income families within the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the area, performance is good when considering the impact that

the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home purchase market shares were too small for meaningful analyses.

The borrower distribution of home improvement loans is good overall. The percentage of lending to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. Key's 2006 moderate-income market share significantly exceeded its overall home improvement share in the AA. While the percentage of loans made to low-income borrowers is well below the percentage of low-income families, performance is considered adequate when considering the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 low-income borrower market share significantly exceeded its overall home improvement market share for the AA.

The borrower distribution of home refinance loans is good. The percentage of lending to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below percentage of low-income families in the AA, performance is considered adequate in this sector when considering the impact that the area's poverty level has on lending to low-income borrowers. Key's 2006 home refinance market share was too small for meaningful analysis.

### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with revenues of \$1 million or less is below the percentage of small businesses within the AA, but Key's 2006 market share of businesses with revenues of less than \$1 million significantly exceeded its overall small loans to business market share.

### ***Small Loans to Farms***

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

The borrower distribution of small loans to farms is adequate. The percentage of loans to farms with revenues of \$1 million or less is below the percentage of small businesses within the AA, but Key's 2006 market share of small loans to farms was near its overall farm lending market share in the AA.

### **Community Development Lending**

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

Community development lending activity within the Salem AA during the evaluation period consisted of three loans totaling \$1.1 million. This level of activity had a neutral impact on the Lending Test rating for Oregon. The CD loans reflect a variety of community development purposes such as affordable housing and activities that revitalize/stabilize low-and moderate-income geographies. For example, Key extended an affordable housing loan to a consortium of area housing organizations to construct, purchase and or rehabilitate single family and other housing units targeted to low- and moderate-income individuals.

### Additional CD Loan Activity

Consideration was given to six additional CD loans totaling \$4.1 million within the State of Oregon but not located within any of the bank's AAs. While having the potential to benefit one or more of the bank's AAs, these additional CD loans did not impact the overall state Lending Test rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Medford AA is not inconsistent with the bank's overall High Satisfactory performance under the Lending Test in Oregon. Performance in the Corvallis AA is considered stronger than the bank's overall Lending Test performance in the state due to relatively higher levels of CD lending. Performance in Eugene and Oregon non-MSA AAs is considered weaker than the bank's overall Lending Test performance in the state due to weaker geographic distribution records. The results of the limited-scope review did not impact the Lending Test rating for Oregon. Refer to the Tables 1 through 12 in the state of Oregon section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Oregon is rated "High Satisfactory." Based on a full-scope review, performance in the Salem AA is adequate. Stronger performance in the limited-scope AAs had a positive impact on the overall State of Oregon Investment Test rating as discussed at the end of this segment. The bank's performance in the State of Oregon was not impacted by investments made in the in the broader regional area.

During the evaluation period, Key originated three investments in the Salem AA totaling \$588 thousand. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on eight prior period investments as of June 30, 2008, was \$360 thousand.

Consideration was also 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 the broader statewide or regional area. These additional investments did not impact the bank's overall Outstanding performance under the State of Oregon. Refer to Table 14 in the State of Oregon section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the Medford and non-metropolitan AAs is not inconsistent with the bank's overall Outstanding performance in the State of Oregon. The bank's performance in the Eugene and Corvallis AAs is weaker than the overall performance in the state due to a lower level of investments. Performance in the limited-scope assessment areas had a positive impact on the State of Oregon Investment Test rating, due to the excellent performance in the Medford and non-metropolitan limited-scope areas. Refer to the Table 14 in the State of Oregon section of Appendix D for the facts and data that support these conclusions.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the State of Oregon is rated "High Satisfactory." Based on a full-scope review, performance in the Salem AA is adequate. However, strong performance within the Eugene and Medford limited-scope AAs positively impacted the Service Test rating for the state, as discussed at the end of this segment.

#### Retail Banking Services

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

The distribution of bank branches is adequate in the Salem AA as they are reasonably accessible to all portions of the full-scope area. The percentage of bank branches located in moderate-income geographies is below the percentage of the population residing in those geographies. While the bank does not have a branch located in a low-income geography, only .98 percent of the Salem population resides in low-income geographies. Similarly, of all Salem AA businesses just .25 percent are located in low-income geographies. During the evaluation period the bank did not open or close any Salem branches.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday hours.

#### Community Development Services

Bank employees provided an adequate level of community development services to the Salem AA. Two employees provided 345 hours of financial guidance to organizations serving the community development needs of low-and moderate-income residents and geographies in Salem. The services the community development organizations provide address the community's needs including economic revitalization and affordable housing low-and moderate-income individuals and families.

The bank designated a majority of its Salem AA branches as KeyBank Plus program branches that offer affordable check cashing for non-depository clients. In addition to fees that are well below those of check cashing companies, participants receive up to five free money orders per visit which facilitates bill payments.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Eugene, Medford and Corvallis AAs is stronger than the bank's overall High Satisfactory Service Test performance for the state of Oregon. The stronger performance is the result of the excellent degree of accessibility of the bank's branch facilities to the portion of the population residing in low-and moderate-income geographies. The stronger performance in the limited-scope Eugene and Medford AAs positively impacted the bank's overall performance in the State of Oregon. The bank derives a significant percentage of Oregon deposits from the Eugene and Medford AAs. The bank's performance under the Service Test in the non-MSA AA is weaker than the bank's overall performance in Oregon due to a weaker branch distribution record. The weaker performance did not impact the state rating.

## State of Utah

<b>CRA Rating for Utah:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- The geographic distribution of Key's lending is good.
- The borrower distribution of Key's lending is good.
- Key has an excellent community development lending record in Utah. CD lending had a positive impact on the state's Lending Test rating.
- The bank had an excellent volume of community development investments that addressed the need for affordable housing and projects that revitalize or stabilize low- and moderate-income areas.
- The bank's distribution of branch and ATM deposit facilities in the Salt Lake AA is excellent. The bank also provided an adequate level of community development services in the Salt Lake AA.

## Description of Institution's Operations in Utah

Key operates 39 branches and 38 deposit-taking ATMs in the State of Utah. These branches represent 3.9 percent of the bank's total branch network. The bank's assessment areas in the state include 2 MSAs or portions of MSAs, and a portion of a Multistate MSA that is comprised of only Utah counties, and 3 counties that comprise the combined non-metropolitan assessment area. The Salt Lake MSA was selected for full-scope review due to its high concentration of deposits (87.9 percent), reported loans (57.3 percent), and branches (56.4 percent) within the state. The concentration of deposits in the Salt Lake MSA far exceeds the Ogden MSA which is the next largest assessment area in terms of deposits with 6.7 percent of Key's deposits in the state. The remaining assessment areas, including the combined non-metropolitan areas, were analyzed using limited-scope procedures. Deposits in Utah represent only 4.6 percent of the bank's total deposits. As such, performance in this rating area did not have a significant impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Utah is rated "Outstanding." Based on a full-scope review, the bank's performance in the Salt Lake AA is good.

### Lending Activity

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

Key's lending activity is adequate in the Salt Lake AA, especially considering the strong level of competition in the market. Key ranks 13th in deposits among 63 depository institutions and has a 1.5 percent share of the market according to June 30, 2007, FDIC deposit data. But, with over 400 lenders

operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Key's primary lending activity has been small loans to businesses, although the bank has also originated/purchased home mortgage loans and some small loans to farms. An insignificant number of multifamily loans were made during the period, so no analyses were performed on that loan type for this AA. According to 2006 aggregate CRA data, Key is ranked 17<sup>th</sup> in volume of originated/purchased small loans to businesses with a market share of less than one percent. According to 2006 aggregate HMDA data, Key is ranked 16<sup>th</sup> with a 1.7 percent share for home improvement lending. For home purchase and home refinance loans, Key is ranked low with market shares of less than one half of one percent.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is good in Utah. This is primarily based on an overall good distribution record within the Salt Lake full-scope AA.

#### ***Home Mortgage Loans***

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

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of the Salt Lake AA is very small. Less than one quarter of one percent of the housing units are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods.

The geographic distribution of home purchase loans is excellent. The percentages of Key's loans in both low-income and moderate-income geographies significantly exceed the percentages of owner-occupied housing units located in those areas, although the bank's performance in the low-income areas is not represented by a significant number of loans. Key's home purchase market share in 2006 was too small for meaningful analysis.

The geographic distribution of home improvement loans is excellent. The percentages of loans in low-income and moderate-income areas exceed the percentage of owner-occupied housing units in those segments of the community, although the bank's performance in low-income areas is not represented by a significant number of loans. Key's 2006 home improvement market share in moderate-income areas significantly exceeded its overall home improvement market share in Salt Lake, while Key made no loans in low-income areas in 2006.

The geographic distribution of home refinance loans is poor. The percentage of Key's loans in moderate-income geographies is well below the percentage of owner-occupied housing units located in those areas. The percentage of the bank's loans in low-income areas was near the percentage of owner-occupied housing units in that segment of the market however only .20 percent of owner-occupied units are located in those areas. More consideration was given to performance in moderate-income areas due to greater opportunities to lend in those areas. Key's 2006 home refinance market was too small for meaningful analysis.

#### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is excellent. The percentages of Key's loans in low-income and moderate-income geographies significantly exceed the percentage of businesses located in those segments of the AA. Key's 2006 small business market share was too small for meaningful analyses.

### ***Small Loans to Farms***

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

The geographic distribution of small loans to farms is poor. The percentages of Key's loans in low-income and moderate-income geographies are well below the percentages of farms located in those segments of the AA. As Key made no small farm loans in 2006, it did not have a share of the market.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in Utah. This is primarily based on a good distribution record within the Salt Lake full-scope AA.

### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentage of loans to low-income borrowers exceeds the percentage of moderate-income families within the AA. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. Key's 2006 home purchase market shares were too small for meaningful analyses.

The borrower distribution of home improvement loans is excellent overall. While the percentage of loans made to low-income borrowers is below the percentage of low-income families, performance is considered good in this sector. This takes into consideration the impact that the area's poverty level has on lending to the low-income segment of the community, as well as the bank's low-income market share significantly exceeds the bank's overall share of the home improvement market in the AA. Performance relative to moderate-income borrowers is very strong. The percentage of lending to moderate-income borrowers significantly exceeds the percentage of moderate-income families, while Key's 2006 moderate-income market share significantly exceeds its overall share of the market.

The borrower distribution of home refinance loans is good. The percentage of loans made to low-income borrowers is well below percentage of low-income families however the opportunities for the bank to lend to low-income borrowers is impacted by the area's poverty level. The percentage of lending to moderate-income borrowers is near the percentage of moderate-income families. Key's 2006 home refinance market share was too small for meaningful analysis.

### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is adequate. The percentage of loans to businesses with revenues of \$1 million or less is lower than the percentage of small businesses within the AA. Key's 2006 market share of small loans to businesses is too small for meaningful analysis.

### ***Small Loans to Farms***

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

The borrower distribution of small loans to farms is excellent. The percentage of loans to farms with revenues of \$1 million or less exceeds the percentage of small businesses within the AA. Key's 2006 market share of small loans to farms exceeded its overall farm lending market share in the AA.

### **Community Development Lending**

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

The bank's record of originating community development loans is excellent in the Salt Lake AA. During the evaluation period Key generated 12 CD loans totaling \$31.9 million in the area. CD lending had a positive impact on the overall Lending Test rating for Utah.

The CD loans reflect a variety of community development purposes such as affordable housing and activities that revitalize/stabilize low-and moderate-income geographies. For example, Key originated a \$5.6 million affordable housing loan to fund the acquisition and rehabilitation of a 55-unit affordable apartment project. The project is located in a moderate-income geography and is part of a Low Income Housing Tax Credit program for low-income individuals. A community contact identified affordable housing as a Salt Lake AA community development need.

#### Additional CD Loan Activity

Consideration was given to one additional CD loan for \$69 thousand within the State of Utah but not located within any of the bank's AAs. While having the potential to benefit one or more of the bank's AAs, this additional CD loan did not impact the overall state rating.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Lending Test in the Ogden, Provo, and Utah non-MSA AAs is not inconsistent with the bank's performance under the Lending Test in the full-scope Salt Lake AA. Performance in the Logan AA is considered weaker due to a weaker borrower distribution record. The results of the limited-scope review did not impact the Lending Test rating for Utah. Refer to the Tables 1 through 12 in the state of Utah section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Utah is rated "Outstanding." Based on a full-scope review, performance in the Salt Lake AA is excellent. The bank's performance in the State of Utah was not impacted by its performance in the broader state/regional area. Key's responsiveness to the identified needs of the assessment area is excellent, especially in the areas of affordable housing and revitalizing low- and moderate-income areas.

During the evaluation period, Key originated 63 investments and donations in the Salt Lake AA totaling \$27.8 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on 19 prior period investments as of June 30, 2008, was \$3.8 million.

Consideration was given to investments the bank made in funds throughout the State of Utah and 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 the broader statewide or regional area. Key did not make any statewide investments in the current evaluation period and had one statewide investment with a remaining balance of \$746 thousand in prior periods. Refer to Table 14 in the State of Utah section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area. These additional investments did not impact the bank's overall Outstanding performance in the State of Utah.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the Ogden AA is not inconsistent with the bank's overall Outstanding performance in the State of Utah. The bank's performance in the Logan, Provo, and non-metropolitan assessment areas is weaker than the overall performance in the state due to a lower level of investments. While weaker than the overall performance in the state, the bank's performance in the non-metropolitan AA is considered adequate. Performance in the limited-scope assessment areas did not impact the overall State of Utah Investment Test rating. Refer to the Table 14 in the State of Utah section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Utah is rated "Outstanding." Based on a full-scope review, performance in the Salt Lake AA is excellent.

### **Retail Banking Services**

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.

The distribution of bank branches is excellent in the Salt Lake AA, as they are readily accessible to all portions of the full-scope area. The percentage of bank branches located in low-income geographies exceeds the percentage of the population residing in those areas while the percentage of bank branches in moderate-income area is substantially the same as the percentage of the population. The accessibility of bank ATMs to residents in low-and moderate-income Salt Lake geographies is also

excellent. During the evaluation period the bank opened one branch in a middle-income Salt Lake geography. During the same period, the bank did not close any Salt Lake branches.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday and Saturday hours.

### **Community Development Services**

Bank employees provided an adequate level of community development services to the Salt Lake AA. Six employees provided 265 hours of financial guidance to organizations serving the community development needs of low-and moderate-income residents and geographies in Salt Lake. The services the community development organizations provide address the community's needs, including affordable housing and services for low-and moderate-income individuals and families.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Logan, Ogden, and non-MSA AAs is not inconsistent with the bank's Outstanding performance in the State of Utah.

## State of Vermont

<b>CRA Rating for Vermont:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- The geographic distribution of Key's lending is good.
- The borrower distribution of Key's lending is good.
- Key has an excellent community development lending record in Vermont. CD lending had a substantial positive impact on the state's Lending Test rating.
- The bank has an excellent volume of community development investments that address the need for affordable housing.
- The bank's distribution of branch and ATM deposit facilities in the Burlington AA is excellent. The bank also provided an adequate level of community development services in the Burlington AA.

## Description of Institution's Operations in Vermont

Key operates 13 branches and 21 deposit-taking ATMs in the State of Vermont. These branches represent 1.3 percent of the bank's total branch network. The bank's assessment areas in the state include the entire Burlington MSA and three entire counties that comprise the non-metropolitan assessment area. The Burlington MSA was selected for full-scope review due to its high concentration of deposits (79.3 percent), reported loans (58.3 percent), branches (69.2 percent), and investments (43.6 percent) within the state. The concentration of deposits in the Burlington MSA far exceeds the combined non-metropolitan assessment area which is the next largest assessment area in terms of deposits with 20.7 percent of Key's deposits in the state. The combined non-metropolitan areas were analyzed using limited-scope procedures. Deposits in Vermont represent only 1.4 percent of the bank's total deposits. As such, performance in this rating area had minimal impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Vermont is rated "Outstanding." Based on a full-scope review, the bank's performance in the Burlington AA is excellent.

### Lending Activity

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

Key's lending activity is adequate in the Burlington AA, especially considering the strong level of competition in the market. Key ranks second in deposits among nine depository institutions and has a 17 percent share of the market according to June 30, 2007, FDIC deposit data. But, with over 150

lenders operating in the AA, the majority of which not being depository institutions, Key's lending market shares are lower than its deposit share.

Key has been active in small business and home refinance lending, while also making some home purchase and home improvement loans. As no multifamily loans and an insignificant number of small loans to farms were made during the period, no analyses were performed on those loan types for this AA. According to 2006 aggregate CRA data, Key is ranked 12<sup>th</sup> in volume of originated/purchased small loans to businesses with a one percent market share. According to 2006 aggregate HMDA data, Key is ranked 18<sup>th</sup> in volume of home refinance lending with a 1.6 percent share, and ranked 14<sup>th</sup> in home improvement lending with a 1.5 percent market share. For home purchase lending, Key is ranked 49<sup>th</sup> with less than one half of one percent market share.

### **Distribution of Loans by Income Level of the Geography**

The geographic distribution of Key's loans is good in Vermont. This is primarily based on an overall good distribution record within the Burlington full-scope AA.

#### ***Home Mortgage Loans***

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

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of the Burlington AA is very small. Less than one half of one percent of the housing units are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods.

The geographic distribution of home purchase loans is excellent, based primarily on performance in moderate income areas. The percentages of Key's loans in both low-income and moderate-income geographies significantly exceed the percentages of owner-occupied housing units located in those areas. However, the bank's performance is not represented by a significant number of loans. Key's home purchase market share in 2006 was too small for meaningful analysis.

The geographic distribution of home improvement loans is adequate, based primarily on performance in the moderate-income geographies. The percentage of loans in moderate-income areas is below the percentage of owner-occupied housing units in that segment of the community. Key's 2006 home improvement market share in moderate-income areas was well below its overall home improvement market share in Burlington. While Key made no loans in the low-income geographies during the period, the opportunity to lend is very limited given the low number of owner-occupied housing units.

The geographic distribution of home refinance loans is good, based primarily on performance in moderate-income areas. The percentage of Key's loans in moderate-income geographies is near the percentage of owner-occupied housing units located in those areas. Key's 2006 home refinance market share in moderate-income areas was below its overall home improvement market share in Burlington. While the percentage of loans in low-income areas significantly exceeds the percentage of owner-occupied housing units in that segment of the market, and Key's low-income market share significantly exceeds its overall market share, the strong performance is represented by few loans.

#### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is good overall, based primarily on performance in moderate-income areas, as there are nearly 11 times as many businesses located in moderate-income areas than in low-income areas. Key made no small loans to businesses in low-income areas during the evaluation period; however, the bank had limited opportunities to lend as less than two percent of businesses are located in low-income portions of the AA. The percentage of Key's loans in moderate-income geographies exceeds the percentage of businesses located in that segment of the AA. Key's 2006 small business market share in moderate-income areas significantly exceeded its overall small business market share in Burlington.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of Key's loans is good in Vermont. This is primarily based on a good distribution record within the Burlington full-scope AA.

#### ***Home Mortgage Loans***

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community.

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families within the AA. While the percentage of loans to low-income borrowers is below the percentage of families in that segment of the AA, performance is considered excellent when considering the impact that the area's poverty level has on lending to the low-income segment of the community. Key's 2006 home purchase market shares were too small for meaningful analyses.

The borrower distribution of home improvement loans is good overall. While the percentage of loans made to low-income borrowers is below the percentage of low-income families, performance is considered good considering the impact that the area's poverty level has on lending to the low-income segment of the community. However, performance is not represented by many loans, and Key's 2006 market share of lending to low-income was well below its overall home improvement market share for the area. The percentage of lending to moderate-income borrowers significantly exceeds the percentage of moderate-income families, while Key's 2006 moderate-income market share was below its overall share of the market.

The borrower distribution of home refinance loans is excellent. The percentage of loans made to low-income borrowers is substantially near the percentage of low-income families. When considering the impact that the area's poverty level has on lending to the low-income segment of the community, performance is particularly strong. And, Key's 2006 market share of lending to low-income borrowers significantly exceeded its overall home refinance market share for the area. The percentage of lending to moderate-income borrowers significantly exceeds the percentage of moderate-income families, while Key's moderate-income market share also significantly exceeded its overall share of the market.

#### ***Small Loans to Businesses***

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

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of small businesses within the AA. Key's 2006 market share of small loans to businesses significantly exceeds its overall small business market share in this AA.

### **Community Development Lending**

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

Key's CD lending record in Vermont is excellent, and had a significant positive impact on the Lending Test rating for the state.

The bank's record of originating community development loans is excellent in the Burlington AA. During the evaluation period Key generated three CD loans totaling \$8 million in the area. The CD loans reflect a variety of community development purposes such as activities that revitalize/stabilize low-and moderate-income geographies and funding for organizations providing community services targeted to low-and moderate-income individuals and families. For example, Key originated a \$2.9 million loan to assist a city's efforts to redevelop its downtown area located in a moderate-income area. The redevelopment plan included funding for a 50 unit affordable housing complex for low- and moderate-income individuals. Low Income Housing Tax Credits were used in conjunction with this project. A community contact identified affordable housing as a Burlington AA community development need.

#### Additional CD Loan Activity

Consideration was given to 12 additional CD loans totaling \$164 million within the State of Vermont but not located within any of the bank's AAs. These loans have the potential to benefit one or more of the bank's AAs. These additional CD loans enhanced the bank's overall performance under the Lending Test, and together with the CD loans made within the bank's AAs, had a positive impact on the bank's Lending Test rating for Vermont.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Lending Test in the Vermont non-MSA AA is weaker than the bank's overall Outstanding performance under the Lending Test in Vermont. The weaker performance is due to relatively lower levels of CD lending. The results of the limited-scope review did not impact the Lending Test rating for Vermont. Refer to the Tables 1 through 12 in the state of Vermont section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Key's overall Investment Test performance in the state of Vermont is rated "Outstanding." Based on a full-scope review, performance in the Burlington AA is excellent. The bank's performance in the State of Vermont was not impacted by its performance in the broader state/regional area. Key's responsiveness to the identified needs of the assessment area is excellent, especially in the areas of affordable housing.

During the evaluation period, Key originated 31 investments and donations in the Burlington AA totaling \$7.9 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on two prior period investments as of June 30, 2008, was \$250 thousand.

Consideration was given to investments the bank made in funds throughout the State of Vermont and 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 the broader statewide or regional area. Key did not make any statewide investments in the current evaluation period and had two statewide investments with remaining balances of \$200 thousand in prior periods. Refer to Table 14 in the State of Vermont section of Appendix D and the Additional Qualified Investments section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments in the state and broader regional area. These additional investments did not impact the bank's overall Outstanding performance under the State of Vermont.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance in the non-metropolitan AA is not inconsistent with the bank's overall Outstanding performance in the State of Vermont. Performance in the limited-scope assessment area did not impact the overall State of Vermont Investment Test rating. Refer to the Table 14 in the State of Vermont section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Vermont is rated "Outstanding." Based on a full-scope review, performance in the Burlington AA is excellent.

### **Retail Banking Services**

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

The distribution of bank branches is excellent in the Burlington AA, as they are readily accessible to all portions of the full-scope area. The percentage of bank branches located in moderate-income geographies exceeds the percentage of the population residing in those geographies. While the bank does not have a branch located in a low-income geography, only 1.51 percent of the Burlington population resides in low-income geographies. Similarly, of all Burlington AA businesses, less than 2 percent are located in low-income geographies. The accessibility of bank ATMs to residents in moderate-income Burlington geographies is excellent. During the evaluation period the bank opened one branch in an upper-income Burlington geography. During the same period, the bank did not close any Burlington branches.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are considered to be convenient and include extended weekday hours. In addition to the traditional branches and ATMs, customers may access bank services through a toll-free telephone number. Customers also have 24-hour access to bank services including the ability to apply for financial products.

### **Community Development Services**

Bank employees provided an adequate level of community development services to the Burlington AA. Seven employees provided almost 700 hours of financial guidance to organizations serving the community development needs of low-and moderate-income residents and geographies in Burlington. The services the community development organizations provide address the community's needs, including affordable housing and services for low-and moderate-income individuals and families.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in the non-MSA geographies is not inconsistent with the bank's overall Outstanding performance in the State of Vermont.

## 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): (1/1/2003 to 12/31/2007)		
	Investment and Service Tests and CD Loans: (7/1/2003 to 6/30/2008)		
Financial Institution:	Products Reviewed		
KeyBank, National Association (“Key”) Cleveland, Ohio	Home Purchase Home Improvement Refinances Small Loans to Businesses 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	
<b>List of Assessment Areas and Type of Examination</b>			
Assessment Area	MSA #/ MD #	Type of Exam	Other Information <small>(Reflects counties in non-MSA areas and/or counties in MSAs or MDs where whole MSAs or MDs were not selected)</small>
<b>Primary Rating Areas</b> <b>Ohio</b> Cleveland OH MSA Akron OH MSA Canton OH MSA Columbus OH MSA Dayton OH MSA Mansfield OH MSA Sandusky OH MSA Springfield OH MSA Toledo OH MSA Youngstown MSA Ohio Non-MSA	#17460 #10420 #15940 #18140 #19380 #31900 #41780 #44220 #45780 #49660	Full scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope	Delaware, Franklin Greene, Montgomery  Mahoning, Trumbull Ashtabula, Columbiana, Defiance, Hancock, Huron, Sandusky, Seneca

<b><u>New York</u></b>			
Albany NY MSA	#10580	Full scope	Warren
Buffalo NY MSA	#15380	Full scope	
Glens Falls NY MSA	#24020	Limited scope	
Kingston NY MSA	#28740	Limited scope	
New York NY MSA	#35644	Limited scope	
Poughkeepsie NY MSA	#39100	Limited scope	
Rochester NY MSA	#40380	Limited scope	
Syracuse NY MSA	#45060	Limited scope	Oneida Cattaraugus, Cayuga, Chautauqua, Clinton, Columbia, Cortland, Franklin, Fulton, Genesee, Greene, Jefferson, Lewis, Montgomery, Otsego, St. Lawrence, Sullivan
Utica NY MSA	#46540	Limited scope	
NY Non-MSA		Limited scope	
<b><u>Washington</u></b>			
Seattle WA MSA	#42644	Full scope	Clallam, Grant, Grays Harbor, Island, Lewis, Lincoln, Mason, Pacific, San Juan, Stevens
Tacoma WA MSA	#45104	Full scope	
Bellingham WA MSA	#13380	Limited scope	
Bremerton WA MSA	#14740	Limited scope	
Kennewick WA MSA	#28420	Limited scope	
Longview WA MSA	#31020	Limited scope	
Mt Vernon WA MSA	#34580	Limited scope	
Olympia WA MSA	#36500	Limited scope	
Wenatchee WA MSA	#48300	Limited scope	
Yakima WA MSA	#49420	Limited scope	
Washington Non-MSA		Limited scope	
<b><u>Non-Primary Rating Areas</u></b>			
Cincinnati-Middletown OH-KY-IN MSA	#17140	Full scope	
Portland Multistate MA	#38900	Full scope	All of Oregon, Washington - Clark
<b><u>Alaska</u></b>			
Anchorage AK MSA	#11260	Full scope	Aleutians West, Juneau, Kenai Peninsula, Ketchikan Gateway, Kodiak Island, Yakutat
Fairbanks AK MSA	#21820	Limited scope	
Alaska Non-MSA		Limited scope	
<b><u>Colorado</u></b>			
Denver CO MSA	#19740	Full scope	Adams, Arapahoe, Broomfield, Denver, Douglas, Jefferson
Boulder CO MSA	#14500	Limited scope	Logan, Morgan
Ft Collins CO MSA	#17820	Limited scope	
Greeley CO MSA	#22660	Limited scope	
Colorado Non-MSA	#24540	Limited scope	

<b><u>Florida</u></b>			
Cape Coral FL MSA	#15980	Full scope	
Naples FL MSA	#34940	Limited scope	
West Palm Beach FL MSA	#48424	Limited scope	
<b><u>Idaho</u></b>			
Boise ID MSA	#14260	Full scope	Ada, Canyon, Gem
Idaho Falls ID MSA	#26820	Limited scope	
Pocatello ID MSA	#38540	Limited scope	Bingham, Cassia, Fremont, Madison, Minidoka, Payette, Teton, Twin Falls
Idaho Non-MSA		Limited scope	
<b><u>Indiana</u></b>			
Indianapolis IN MSA	#26900	Full scope	Boone, Hamilton, Johnson, Marion, Morgan, Shelby
Anderson IN MSA	#11300	Limited scope	
Bloomington IN MSA	#14020	Limited scope	Monroe
Elkhart IN MSA	#21140	Limited scope	
Kokomo IN MSA	#29020	Limited scope	Howard
South Bend IN MSA	#43780	Limited scope	St. Joseph
Indiana Non-MSA		Limited scope	Kosciusko, Marshall, Pulaski, Starke, Steuben
<b><u>Maine</u></b>			
Portland ME MSA	#38860	Full scope	
Bangor ME MSA	#12620	Limited scope	
Lewiston ME MSA	#30340	Limited scope	
Maine Non-MSA		Limited scope	Aroostook, Franklin, Hancock, Kennebec, Knox, Lincoln, Oxford, Piscataquis, Somerset, Waldo
<b><u>Michigan</u></b>			
Wayne County MD portion of the Detroit MI MSA	#19804	Full scope	
Oakland-Macomb-Livingston MD portion of the Detroit MI MSA	#47644	Full scope	Livingston, Macomb, Oakland
Ann Arbor MI MSA	#11460	Limited scope	
Monroe MI MSA	#33780	Limited scope	
Michigan Non-MSA		Limited scope	Lenawee, St. Joseph
<b><u>Oregon</u></b>			
Salem OR MSA	#41420	Full scope	
Corvallis OR MSA	#18700	Limited scope	
Eugene OR MSA	#21660	Limited scope	
Medford OR MSA	#32780	Limited scope	
Oregon Non-MSA		Limited scope	Hood River, Josephine, Linn
<b><u>Utah</u></b>			
Salt Lake UT MSA	#41620	Full scope	
Logan UT MSA	#30860	Limited scope	Cache
Ogden UT MSA	#36360	Limited scope	Davis, Weber

Provo UT MSA Utah Non-MSA	#39340	Limited scope Limited scope	Utah Box Elder, Carbon, Emery
<u><b>Vermont</b></u> Burlington VT MSA Vermont Non-MSA	#15540	Full scope Limited scope	Addison, Bennington, Rutland, Washington, Windham

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS: KeyBank National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
BANK NAME	Outstanding	Outstanding	Outstanding	Outstanding
Primary Rating Areas:				
State of Ohio	Outstanding	Outstanding	High Satisfactory	Outstanding
State of New York	Outstanding	Outstanding	Outstanding	Outstanding
State of Washington	Outstanding	Outstanding	Outstanding	Outstanding
Multistate Metropolitan Area or State:				
Cincinnati Multistate Metropolitan Area	Outstanding	Outstanding	Low Satisfactory	Outstanding
Portland Multistate Metropolitan Area	Outstanding	Outstanding	Outstanding	Outstanding
State of Alaska	Outstanding	Outstanding	Outstanding	Outstanding
State of Colorado	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Florida	Low Satisfactory	Needs to Improve	Low Satisfactory	Needs to Improve
State of Idaho	Outstanding	Low Satisfactory	Outstanding	Outstanding
State of Indiana	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Maine	Outstanding	Outstanding	Outstanding	Outstanding
State of Michigan	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Oregon	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Utah	Outstanding	Outstanding	Outstanding	Outstanding
State of Vermont	Outstanding	Outstanding	Outstanding	Outstanding

(\*) 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 OH						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	693	16.02	20.06	38.82	23.81	1.30
Population by Geography	2,148,143	9.74	16.77	43.79	29.67	0.03
Owner-Occupied Housing by Geography	580,878	4.83	12.41	48.22	34.54	0.00
Business by Geography	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 HUD Adjusted Median Family Income for 2007		52,660 60,700	Median Housing Value Unemployment Rate (6/2008)		121,274 7.70 percent	
Households Below Poverty Level		11 percent				

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

Source: 2000 US Census and 2007 HUD updated MFI

The Cleveland AA is comprised of the entire Cleveland MSA. The MSA is comprised of five contiguous counties, including: Cuyahoga, Geauga, Lake, Lorain, and Medina. The MSA contains 693 census tracts of which 16 percent are low-income, 20.1 percent are moderate-income, 38.8 percent are middle-income, and 23.8 percent are upper-income. Additionally, 1.3 percent of the census tracts in the MSA does not have income information and are characterized as NA. The 2007 HUD adjusted median family income for the MSA is \$60,700. Approximately 11 percent of households in the MSA fall below the poverty level.

As of June 30, 2007, Key had \$10.6 billion in deposits in the MSA and is ranked second with a 17.5 percent market share of deposits. Banking competition is strong with 42 FDIC-insured institutions with 729 branches operating in the MSA, but the market is fairly concentrated with the five largest banks holding 68.9 percent of the MSA's deposits. Key's main deposit competitor is National City bank with a 27.7 percent market share of deposits. Key operates 68 branches and 154 ATMs, including 126 deposit-taking ATMs, in the MSA.

The Cleveland economy is currently in a deep recession with a jobless rate of 7.7 percent which is above the national average. A soft housing market is a further drain on the local economy, particularly the already declining construction industry. Cleveland's economy continues to be heavily dependent on manufacturing, particularly automobiles. Ford Motor Company is a major employer. Cleveland has a strong healthcare infrastructure and its top employers include the Cleveland Clinic and University Hospitals. Education and health services make up 16.2 percent of total employment with manufacturing jobs at 13.3 percent and governmental jobs at 13.2 percent. While housing is generally affordable due to declining home prices, per capita income has decreased as well.

Contacts with community-based organizations 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, and
- Individual Development Accounts (IDAs); matched savings accounts.

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

**10580 Albany NY**

Demographic Information for Full Scope Area: 10580 Albany NY						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent 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
Business 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 HUD Adjusted Median Family Income for 2007 Households Below Poverty Level		54,944 66,300 9 percent	Median Housing Value Unemployment Rate (6/2008)		103,896 5.70 percent	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2007 HUD updated MFI

The Albany AA is comprised of the entire Albany MSA. The MSA is comprised of five contiguous counties, including: Albany, Rensselaer, Saratoga, Schenectady, and Schoharie. The MSA contains 214 census tracts of which 9.4 percent are low-income, 20.1 percent are moderate-income, 48.1 percent are middle-income, and 21.5 percent are upper-income. Additionally, .9 percent of the census tracts in the MSA does not have income information and are characterized as NA. The 2007 HUD adjusted median family income for the MSA is \$66,300. Approximately 9 percent of households in the MSA fall below the poverty level.

As of June 30, 2007, Key had \$4.3 billion in deposits in the MSA and is ranked first with a 23.5 percent market share of deposits. Banking competition is strong with 24 FDIC-insured institutions with 316 branches operating in the MSA, but the market is fairly concentrated with the four largest banks holding 69.4 percent of the MSA's deposits. Key's main deposit competitor is Citizens Bank with a 21.8 percent market share of deposits. Key operates 40 branches and 66 ATMs, including 55 deposit-taking ATMs, in the MSA.

The Albany economy is currently in recession as nearly all private service-providing industries are losing jobs with a jobless rate of 5.7 percent. Government jobs provide 24.1 percent of the jobs in Albany, however state government payrolls, which contribute the majority of governmental jobs, are set to contract over the next year as state budget deficits grow. Education and health services jobs make up 17.9 percent of total employment with professional and business services jobs at 12.1 percent. Albany is a leader in nanotechnology. The city is at the center of an area labeled "Tech Valley" and is home to a growing number of companies, entrepreneurs and research facilities focusing on high-tech industries such as geographical information, nanotechnology, biotechnology, homeland security, information technology, and alternative energy. The lack of a housing boom during 2005 and 2006 is expected to prevent a significant drop in housing prices over the next year. However, as wages are expected to decline, housing is likely to be less affordable.

Contacts with community-based organizations indicated 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 ample community development opportunities particularly for lending and investments through partnerships with various affordable housing agencies and developers, community service organizations, availability of LIHTC projects as well as other investment opportunities.

## 15380 Buffalo NY

Demographic Information for Full Scope Area: 15380 Buffalo NY						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	302	10.60	20.86	45.36	19.54	3.64
Population by Geography	1,170,111	8.78	16.45	47.62	26.35	0.81
Owner-Occupied Housing by Geography	310,174	4.34	13.17	51.87	30.61	0.00
Business by Geography	70,487	9.31	13.03	45.89	29.96	1.80
Farms by Geography	1,603	1.81	4.68	59.33	33.69	0.50
Family Distribution by Income Level	303,215	20.37	18.07	22.08	39.48	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	116,550	15.99	24.51	45.47	14.03	0.00
Median Family Income HUD Adjusted Median Family Income for 2007 Households Below Poverty Level		49,149 59,300 12 percent	Median Housing Value Unemployment Rate (6/2008)		84,957 5.70 percent	

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

Source: 2000 US Census and 2007 HUD updated MFI

The Buffalo AA is comprised of the entire Buffalo MSA which includes both Erie and Niagara counties. The MSA contains 302 census tracts of which 10.6 percent are low-income, 20.9 percent are moderate-income, 45.4 percent are middle-income, and 19.5 percent are upper-income. Additionally, 3.6 percent of the census tracts in the MSA does not have income information and are characterized as NA. The 2007 HUD adjusted median family income for the MSA is \$59,300. Approximately 12 percent of households in the MSA fall below the poverty level.

As of June 30, 2007, Key had \$2.9 billion in deposits in the MSA and is ranked third with an 8.1 percent market share of deposits. Banking competition is strong with 20 FDIC-insured institutions with 324 branches operating in the MSA; however the deposit market is dominated by HSBC Bank with a 51.9 percent market share and by Manufacturers & Traders Trust Co. with a 22.1 percent deposit market share. Key operates 37 branches and 44 ATMs, including 42 deposit-taking ATMs, in the MSA.

The Buffalo economy is currently in recession as the metro area is losing jobs in nearly every industry. The jobless rate of 5.7 percent is expected to rise due to Buffalo's exposure to declining auto manufacturing and its dependence on a faltering Canadian economy. State and local government jobs provide 17.3 percent of the jobs in Buffalo with educational and health services jobs at 15.6 percent. Retail trade and manufacturing comprise 11.3 percent and 11.1 percent of employment respectively. The Niagara Falls area and casinos provide tourism attractions, however both are expected to suffer due to unfavorable economic conditions. Delinquency rates on mortgage loans are rising sharply, and foreclosures are expected to increase as well, particularly if layoffs result from decreased manufacturing demand.

Financial institutions have ample community development opportunities particularly for lending and investments through partnerships with various affordable housing agencies and developers,

community service organizations, availability of LIHTC projects as well as other investment opportunities.

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

- Home rehabilitation loans
- Loan programs to help revitalize struggling business districts
- Loans for smaller affordable housing projects
- Emergency repair loans as well as weatherization
- Down payment assistance for home buyers
- Products to serve the unbanked.
- Small business entrepreneur education programs.

## 45104 Tacoma WA

Demographic Information for Full Scope Area: 45104 Tacoma WA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	158	3.16	18.99	56.96	20.25	0.63
Population by Geography	700,820	2.73	18.13	58.48	20.44	0.22
Owner-Occupied Housing by Geography	165,623	0.50	10.96	63.09	25.46	0.00
Business by Geography	45,347	1.98	21.77	55.38	20.87	0.00
Farms by Geography	1,199	1.17	13.09	61.38	24.35	0.00
Family Distribution by Income Level	181,466	18.66	18.89	23.23	39.22	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	68,136	5.23	26.44	56.09	12.24	0.00
Median Family Income HUD Adjusted Median Family Income for 2007 Households Below Poverty Level		52,165 61,500 10 percent	Median Housing Value Unemployment Rate (6/2008)		144,289 6.30 percent	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2007 HUD updated MFI

The Tacoma AA is comprised of Pierce County and represents the entire Tacoma Metropolitan Division, which is part of the Seattle-Tacoma-Bellevue MSA. The area contains 158 census tracts of which 3.2 percent are low-income, 19 percent are moderate-income, 57 percent are middle-income, and 20.3 percent are upper-income. Additionally, .6 percent of the census tracts in the MSA does not have income information and are characterized as NA. The 2007 HUD adjusted median family income for the MSA is \$61,500. Approximately 10 percent of households in the MSA fall below the poverty level.

As of June 30, 2007, Key had \$1.4 billion in deposits in the AA and is ranked second with a 16.2 percent market share of deposits. Banking competition is strong with 34 FDIC-insured institutions with 206 branches operating in the area. The market is fairly concentrated with the five largest banks holding 64.2 percent of the area's deposits. Key's main deposit competitor is Columbia State Bank with a 16.6 percent market share of deposits. Key operates 28 branches and 76 ATMs, including 50 deposit-taking ATMs, in the AA.

While the Tacoma economy is currently stalled in terms of net job creation, the Tacoma area has not seen the dramatic employment volatility seen in other areas of the country, mostly due to the economic diversity in the area. The top employers in the area include U.S. Army Fort Lewis and the McChord Air Force Base. The Port of Tacoma is the sixth busiest container port in North America and is important to the local economy. Oil and refining operations are also located near the Port of Tacoma. Government jobs provide 19.5 percent of the jobs in Tacoma. Education and health services jobs make up 14.4 percent of total employment followed by retail trade at 11.9 percent. Home mortgage delinquencies and foreclosures are steadily rising while falling home prices weaken home equity positions and discretionary spending. Credit deterioration is worse than anticipated.

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

- Affordable home mortgages,
- Community development loans for affordable housing projects
- Foreclosure avoidance programs
- Better access to banking facilities

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

## 42644 Seattle WA

Demographic Information for Full Scope Area: 42644 Seattle WA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent 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
Business 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 HUD Adjusted Median Family Income for 2007 Households Below Poverty Level		63,951 75,600 8 percent	Median Housing Value Unemployment Rate (6/2008)		228,785 4.50 percent	

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

Source: 2000 US Census and 2007 HUD updated MFI

The Seattle AA is comprised of King and Snohomish counties, and represents the Seattle Metropolitan Division of the Seattle-Tacoma-Bellevue MSA. The Metropolitan Division contains 506 census tracts of which 2.2 percent are low-income, 20.8 percent are moderate-income, 53 percent are middle-income, and 24.1 percent are upper-income. The 2007 HUD adjusted median family income for the area is \$75,600. Approximately 8 percent of households in the area fall below the poverty level.

As of June 30, 2007, Key had \$4.9 billion in deposits in the AA and is ranked fourth with an 8.4 percent market share of deposits. Banking competition is very strong with 72 FDIC-insured institutions with 712 branches operating in the AA. The market is fairly concentrated with the five largest banks holding 70.7 percent of the area's deposits. Bank of America is the dominant bank in the area with a 31.2 percent market share of deposits. Key operates 72 branches and 112 ATMs, including 104 deposit-taking ATMs, in the AA.

Compared with other areas of the country, the Seattle economy is performing favorably despite the current recessionary period. Seattle's per capita income is well above the national average as are housing costs. The area boasts a highly trained, well educated work force and is a global center for the software industry. Top employers include the Boeing Company and Microsoft. Professional and business services provide 14.6 percent of the jobs in Seattle, government jobs provide 13.7 percent, while manufacturing, and educational and health services provide 11.5 percent and 10.4 percent respectively. Housing construction has dragged as builders have reined in construction and home prices are falling. The overall global slowdown is expected to lead to a soft market for aircraft while financial industry layoffs are expected as well.

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, availability of LIHTC projects as well as other investment opportunities.

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

## Appendix D: Tables of Performance Data

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## 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 30<sup>th</sup> 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.

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007						
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
17460 Cleveland OH	34.35	5,208	423,124	3,738	755,912	1	325	80	234,889	9,027	1,414,250	61.52
<b>Limited Review:</b>												
10420 Akron OH	9.06	1,312	96,591	1,057	225,396	4	72	8	9,427	2,381	331,486	6.24
15940 Canton OH	5.96	898	74,436	668	122,182	0	0	1	70	1,567	196,688	3.82
18140 Columbus OH	13.64	2,185	99,865	1,381	238,798	0	0	19	43,443	3,585	382,106	6.93
19380 Dayton OH	8.58	1,272	63,854	974	212,024	6	580	3	2,633	2,255	279,091	5.66
31900 Mansfield OH	2.10	353	22,198	200	37,898	0	0	0	0	553	60,096	1.33
41780 Sandusky OH	1.30	240	17,626	98	12,593	3	121	0	0	341	30,340	1.28
44220 Springfield OH	1.56	324	10,866	81	19,054	3	123	1	1,500	409	31,543	0.86
45780 Toledo OH	13.13	2,387	157,960	1,058	146,607	1	100	4	13,412	3,450	318,079	8.53
49660 Youngstown OH	3.35	503	26,194	371	65,791	0	0	7	16,565	881	108,550	0.69
OH Non-MSA Areas	6.97	1,367	69,985	427	64,352	35	3,457	3	5,265	1,832	143,059	3.14
Statewide CD Loans with potential benefit to one or more AAs								12	324,110			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
17460 Cleveland OH	1,114	41.58	4.83	13.73	12.41	21.81	48.22	26.84	34.54	37.61	0.64	1.68	1.04	0.36	0.72	
<b>Limited Review:</b>																
10420 Akron OH	238	8.88	2.76	3.78	18.38	18.07	51.56	48.74	27.30	29.41	0.37	0.15	0.36	0.35	0.45	
15940 Canton OH	153	5.71	0.92	0.65	14.69	7.19	65.16	62.09	19.23	30.07	0.47	0.00	0.39	0.46	0.57	
18140 Columbus OH	246	9.18	4.06	5.69	17.54	19.11	39.59	33.74	38.80	41.46	0.18	0.05	0.18	0.18	0.19	
19380 Dayton OH	190	7.09	2.33	3.16	18.71	15.79	45.53	34.74	33.44	46.32	0.23	0.66	0.37	0.19	0.20	
31900 Mansfield OH	26	0.97	0.16	0.00	14.17	11.54	58.08	50.00	27.58	38.46	0.20	0.00	0.28	0.14	0.28	
41780 Sandusky OH	40	1.49	0.00	0.00	18.57	17.50	65.56	57.50	15.87	25.00	0.49	0.00	0.00	0.40	1.35	
44220 Springfield OH	16	0.60	1.73	0.00	9.72	0.00	59.32	68.75	29.23	31.25	0.10	0.00	0.00	0.11	0.14	
45780 Toledo OH	385	14.37	2.74	1.04	13.99	7.01	56.25	57.40	27.01	34.55	0.61	0.76	0.44	0.64	0.60	
49660 Youngstown OH	57	2.13	2.74	1.75	12.34	1.75	60.78	59.65	24.14	36.84	0.19	1.64	0.00	0.14	0.32	
OH Non-MSA Areas	214	7.99	0.00	0.00	6.94	7.01	73.60	77.57	19.46	15.42	0.57	0.00	0.35	0.67	0.30	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
17460 Cleveland OH	2,373	30.89	4.83	8.77	12.41	16.22	48.22	46.14	34.54	28.87	8.25	12.07	9.23	7.38	8.63	
<b>Limited Review:</b>																
10420 Akron OH	479	6.24	2.76	2.09	18.38	18.79	51.56	57.20	27.30	21.92	4.53	0.00	4.44	5.36	3.16	
15940 Canton OH	269	3.50	0.92	1.49	14.69	15.61	65.16	64.68	19.23	18.22	4.44	6.67	3.83	4.40	5.06	
18140 Columbus OH	1,506	19.60	4.06	3.72	17.54	23.57	39.59	45.15	38.80	27.56	12.05	9.20	14.67	13.66	9.21	
19380 Dayton OH	750	9.76	2.33	4.13	18.71	22.00	45.53	46.67	33.44	27.20	8.81	15.52	9.77	8.86	7.45	
31900 Mansfield OH	124	1.61	0.16	0.81	14.17	12.90	58.08	55.65	27.58	30.65	5.10	0.00	4.12	5.03	5.92	
41780 Sandusky OH	103	1.34	0.00	0.00	18.57	15.53	65.56	73.79	15.87	10.68	9.51	0.00	7.79	10.69	7.41	
44220 Springfield OH	226	2.94	1.73	2.65	9.72	11.95	59.32	64.16	29.23	21.24	15.20	10.00	16.07	15.52	14.65	
45780 Toledo OH	992	12.91	2.74	2.92	13.99	14.01	56.25	57.16	27.01	25.91	11.35	8.45	7.69	12.64	11.26	
49660 Youngstown OH	240	3.12	2.74	4.17	12.34	17.50	60.78	65.00	24.14	13.33	2.43	11.54	5.52	2.11	1.25	
OH Non-MSA Areas	620	8.07	0.00	0.00	6.94	7.74	73.60	73.87	19.46	18.39	8.72	0.00	9.02	8.76	8.44	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
17460 Cleveland OH	1,714	30.26	4.83	8.23	12.41	11.90	48.22	41.48	34.54	38.39	0.88	1.40	0.94	0.77	0.94
<b>Limited Review:</b>															
10420 Akron OH	594	10.49	2.76	3.54	18.38	16.50	51.56	49.16	27.30	30.81	0.73	0.68	0.64	0.76	0.73
15940 Canton OH	476	8.40	0.92	0.84	14.69	11.76	65.16	59.45	19.23	27.94	0.96	1.15	0.77	0.98	1.04
18140 Columbus OH	425	7.50	4.06	1.88	17.54	16.71	39.59	39.53	38.80	41.88	0.38	0.11	0.35	0.43	0.39
19380 Dayton OH	331	5.84	2.33	2.72	18.71	16.92	45.53	45.62	33.44	34.74	0.64	0.61	0.68	0.64	0.62
31900 Mansfield OH	203	3.58	0.16	0.49	14.17	11.82	58.08	44.83	27.58	42.86	1.63	0.00	1.18	1.40	2.30
41780 Sandusky OH	96	1.69	0.00	0.00	18.57	10.42	65.56	64.58	15.87	25.00	1.22	0.00	0.33	1.44	1.33
44220 Springfield OH	80	1.41	1.73	0.00	9.72	7.50	59.32	58.75	29.23	33.75	0.89	0.00	0.81	0.90	0.96
45780 Toledo OH	1,007	17.78	2.74	1.29	13.99	10.13	56.25	49.85	27.01	38.73	1.64	1.20	1.36	1.52	2.06
49660 Youngstown OH	206	3.64	2.74	0.49	12.34	7.28	60.78	64.08	24.14	28.16	0.68	0.00	0.73	0.75	0.54
OH Non-MSA Areas	532	9.39	0.00	0.00	6.94	7.89	73.60	76.13	19.46	15.98	1.28	0.00	1.34	1.34	1.02

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans***	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units**	% BANK Loans						
<b>Full Review:</b>																
17460 Cleveland OH	7	29.17	12.81	28.57	25.25	14.29	44.29	57.14	17.66	0.00	1.49	3.85	0.00	2.17	0.00	
<b>Limited Review:</b>																
10420 Akron OH	1	4.17	12.03	0.00	24.76	0.00	44.88	0.00	18.33	100.00	2.04	0.00	0.00	0.00	100.00	
15940 Canton OH	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	
18140 Columbus OH	8	33.33	13.19	0.00	31.59	50.00	33.42	25.00	21.79	25.00	5.74	0.00	11.11	5.71	4.17	
19380 Dayton OH	1	4.17	9.11	0.00	22.31	100.00	46.47	0.00	22.11	0.00	1.59	0.00	6.25	0.00	0.00	
31900 Mansfield OH	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	
41780 Sandusky OH	1	4.17	0.00	0.00	31.32	100.00	48.15	0.00	20.53	0.00	10.00	0.00	16.67	0.00	0.00	
44220 Springfield OH	2	8.33	4.16	0.00	21.72	0.00	70.62	100.00	3.49	0.00	28.57	0.00	0.00	33.33	0.00	
45780 Toledo OH	3	12.50	7.15	0.00	21.51	0.00	54.06	66.67	17.28	33.33	1.54	0.00	0.00	3.13	0.00	
49660 Youngstown OH	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	
OH Non-MSA Areas	1	4.17	0.00	0.00	13.50	0.00	72.17	100.00	14.34	0.00	2.94	0.00	0.00	4.17	0.00	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: OHIO					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
17460 Cleveland OH	3,673	36.77	8.01	8.22	14.96	17.29	40.66	34.03	35.66	40.46	1.31	1.85	2.16	1.14	1.20						
<b>Limited Review:</b>																					
10420 Akron OH	1,057	10.58	9.15	9.74	14.36	13.34	43.51	40.02	32.98	36.90	1.21	1.20	1.45	1.17	1.23						
15940 Canton OH	668	6.69	3.82	2.99	14.98	14.52	57.65	52.69	23.55	29.79	1.81	2.20	1.99	1.76	1.93						
18140 Columbus OH	1,381	13.83	8.80	10.07	18.53	18.32	35.81	28.82	36.86	42.80	0.93	1.58	1.05	0.79	0.93						
19380 Dayton OH	974	9.75	7.67	8.62	20.82	20.74	39.38	30.39	32.12	40.25	1.42	2.17	1.69	0.99	1.67						
31900 Mansfield OH	200	2.00	3.49	10.00	20.43	36.00	51.75	21.50	24.33	32.50	1.28	4.79	2.48	0.67	1.19						
41780 Sandusky OH	98	0.98	0.00	0.00	24.61	22.45	60.06	54.08	15.33	23.47	1.36	0.00	1.04	1.27	2.22						
44220 Springfield OH	81	0.81	2.79	2.47	17.99	18.52	54.80	45.68	24.42	33.33	0.53	0.00	0.82	0.56	0.41						
45780 Toledo OH	1,058	10.59	4.48	4.73	12.01	13.99	54.33	41.49	29.18	39.79	1.53	2.36	1.85	1.31	1.76						
49660 Youngstown OH	371	3.71	4.99	2.96	14.74	8.36	51.56	53.10	28.46	35.58	0.77	0.73	0.69	0.79	0.82						
OH Non-MSA Areas	427	4.28	0.00	0.00	8.28	9.60	75.62	82.20	16.10	8.20	0.87	0.00	1.67	0.98	0.41						

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: OHIO					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
<b>Full Review:</b>																
17460 Cleveland OH	1	1.89	2.19	0.00	6.59	0.00	50.63	100.00	40.49	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
10420 Akron OH	4	7.55	2.78	0.00	7.12	0.00	58.00	100.00	32.10	0.00	1.64	0.00	0.00	2.63	0.00	
15940 Canton OH	0	0.00	0.94	0.00	7.82	0.00	74.45	0.00	16.79	0.00	0.00	0.00	0.00	0.00	0.00	
18140 Columbus OH	0	0.00	2.69	0.00	12.80	0.00	45.74	0.00	38.76	0.00	0.00	0.00	0.00	0.00	0.00	
19380 Dayton OH	6	11.32	1.08	0.00	12.73	0.00	55.78	100.00	30.42	0.00	0.00	0.00	0.00	0.00	0.00	
31900 Mansfield OH	0	0.00	0.30	0.00	2.67	0.00	71.22	0.00	25.82	0.00	0.00	0.00	0.00	0.00	0.00	
41780 Sandusky OH	3	5.66	0.00	0.00	6.57	0.00	80.75	100.00	12.68	0.00	5.56	0.00	0.00	8.33	0.00	
44220 Springfield OH	3	5.66	0.84	0.00	4.21	0.00	49.16	0.00	45.79	100.00	0.00	0.00	0.00	0.00	0.00	
45780 Toledo OH	1	1.89	0.78	0.00	4.14	0.00	72.85	100.00	22.24	0.00	0.00	0.00	0.00	0.00	0.00	
49660 Youngstown OH	0	0.00	1.11	0.00	4.79	0.00	70.02	0.00	24.08	0.00	0.00	0.00	0.00	0.00	0.00	
OH Non-MSA Areas	35	66.04	0.00	0.00	0.97	0.00	69.70	100.00	29.34	0.00	3.18	0.00	0.00	5.24	0.00	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans**	% Families3	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
17460 Cleveland OH	1,114	41.58	20.34	17.17	18.08	22.77	22.21	20.57	39.37	39.49	0.78	1.24	0.68	0.66	0.82	
<b>Limited Review:</b>																
10420 Akron OH	238	8.88	19.24	15.09	18.62	31.03	23.21	15.09	38.93	38.79	0.46	0.78	0.52	0.16	0.52	
15940 Canton OH	153	5.71	17.81	11.33	19.41	30.00	24.06	17.33	38.73	41.33	0.56	0.48	0.69	0.19	0.78	
18140 Columbus OH	246	9.18	19.80	19.75	17.61	33.61	22.33	16.39	40.26	30.25	0.21	0.29	0.33	0.11	0.18	
19380 Dayton OH	190	7.09	19.59	15.96	18.50	25.53	22.25	19.15	39.66	39.36	0.28	0.48	0.31	0.32	0.18	
31900 Mansfield OH	26	0.97	17.95	3.85	19.32	34.62	23.37	30.77	39.36	30.77	0.25	0.00	0.19	0.56	0.14	
41780 Sandusky OH	40	1.49	19.00	15.38	18.59	15.38	23.34	28.21	39.07	41.03	0.59	0.65	0.31	0.60	0.73	
44220 Springfield OH	16	0.60	18.75	12.50	18.55	31.25	24.25	18.75	38.44	37.50	0.12	0.00	0.00	0.15	0.26	
45780 Toledo OH	385	14.37	20.18	14.06	18.07	28.12	22.67	24.67	39.08	33.16	0.71	0.96	0.74	0.57	0.70	
49660 Youngstown OH	57	2.13	18.59	12.28	18.34	14.04	22.23	26.32	40.83	47.37	0.22	0.33	0.15	0.39	0.08	
OH Non-MSA Areas	214	7.99	16.43	12.98	18.92	28.85	24.13	25.96	40.52	32.21	0.67	0.72	0.76	0.60	0.67	

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by bank.

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

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

3 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, 2004 TO DECEMBER 31, 2007									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families***	% BANK Loans****	% Families <sup>4</sup>	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
17460 Cleveland OH	2,373	30.89	20.34	13.26	18.08	21.72	22.21	26.74	39.37	38.27	8.11	7.45	7.90	7.83	8.69	
<b>Limited Review:</b>																
10420 Akron OH	479	6.24	19.24	14.29	18.62	21.75	23.21	30.28	38.93	33.69	4.48	3.75	3.42	5.23	4.90	
15940 Canton OH	269	3.50	17.81	15.77	19.41	21.92	24.06	27.31	38.73	35.00	4.33	7.06	3.75	2.66	5.39	
18140 Columbus OH	1,506	19.60	19.80	11.06	17.61	27.05	22.33	28.91	40.26	32.98	12.50	13.82	13.13	12.11	11.94	
19380 Dayton OH	750	9.76	19.59	12.75	18.50	24.56	22.25	28.32	39.66	34.36	8.91	11.38	9.65	8.21	8.05	
31900 Mansfield OH	124	1.61	17.95	16.13	19.32	17.74	23.37	30.65	39.36	35.48	5.19	5.97	3.52	5.38	5.94	
41780 Sandusky OH	103	1.34	19.00	10.68	18.59	29.13	23.34	24.27	39.07	35.92	9.88	7.50	12.86	6.76	11.59	
44220 Springfield OH	226	2.94	18.75	14.16	18.55	25.66	24.25	27.43	38.44	32.74	15.45	9.72	19.57	20.49	10.98	
45780 Toledo OH	992	12.91	20.18	12.69	18.07	22.74	22.67	25.28	39.08	39.29	11.51	12.74	9.42	10.36	13.62	
49660 Youngstown OH	240	3.12	18.59	13.39	18.34	24.69	22.23	30.96	40.83	30.96	2.48	3.45	2.75	2.64	1.79	
OH Non-MSA Areas	620	8.07	16.43	11.69	18.92	25.65	24.13	26.79	40.52	35.88	8.75	10.00	9.27	9.43	7.47	

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 1.4% of loans originated and purchased by bank.

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

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

4 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families***	% BANK Loans****	% Families <sup>5</sup>	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
17460 Cleveland OH	1,714	30.26	20.34	14.67	18.08	24.48	22.21	23.91	39.37	36.94	0.94	1.31	1.10	0.82	0.85	
<b>Limited Review:</b>																
10420 Akron OH	594	10.49	19.24	12.06	18.62	25.00	23.21	26.77	38.93	36.17	0.86	0.97	1.09	0.84	0.71	
15940 Canton OH	476	8.40	17.81	12.17	19.41	23.48	24.06	23.91	38.73	40.43	1.13	1.66	1.30	0.99	0.97	
18140 Columbus OH	425	7.50	19.80	10.64	17.61	21.04	22.33	24.26	40.26	44.06	0.46	0.59	0.51	0.36	0.47	
19380 Dayton OH	331	5.84	19.59	15.53	18.50	24.84	22.25	24.53	39.66	35.09	0.79	1.39	1.08	0.60	0.60	
31900 Mansfield OH	203	3.58	17.95	9.41	19.32	18.32	23.37	23.76	39.36	48.51	1.97	2.59	2.40	1.99	1.47	
41780 Sandusky OH	96	1.69	19.00	9.68	18.59	30.11	23.34	15.05	39.07	45.16	1.43	2.16	2.05	0.50	1.54	
44220 Springfield OH	80	1.41	18.75	11.39	18.55	29.11	24.25	25.32	38.44	34.18	1.10	1.29	1.52	0.77	1.05	
45780 Toledo OH	1,007	17.78	20.18	12.02	18.07	19.12	22.67	27.75	39.08	41.11	1.97	2.71	1.82	1.84	1.96	
49660 Youngstown OH	206	3.64	18.59	4.95	18.34	24.26	22.23	28.22	40.83	42.57	0.79	0.38	0.97	0.68	0.88	
OH Non-MSA Areas	532	9.39	16.43	7.98	18.92	25.29	24.13	30.42	40.52	36.31	1.56	2.06	2.04	1.51	1.20	

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 4.6% of loans originated and purchased by bank.

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

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

<sup>5</sup> 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, 2004 TO DECEMBER 31, 2007			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
17460 Cleveland OH	3,738	37.18	67.19	50.94	54.33	19.66	26.00	1.31	1.92
<b>Limited Review:</b>									
10420 Akron OH	1,057	10.51	67.04	47.87	49.86	21.76	28.38	1.21	1.43
15940 Canton OH	668	6.64	66.72	59.88	58.83	18.11	23.05	1.81	3.15
18140 Columbus OH	1,381	13.74	63.69	53.37	57.35	21.43	21.22	0.93	1.50
19380 Dayton OH	974	9.69	63.26	55.95	48.77	24.54	26.69	1.42	2.39
31900 Mansfield OH	200	1.99	65.57	53.50	53.50	22.00	24.50	1.28	1.49
41780 Sandusky OH	98	0.97	65.75	66.33	69.39	15.31	15.31	1.36	2.22
44220 Springfield OH	81	0.81	61.07	46.91	45.68	24.69	29.63	0.53	0.60
45780 Toledo OH	1,058	10.52	64.73	61.53	67.20	15.78	17.01	1.53	2.35
49660 Youngstown OH	371	3.69	63.99	57.68	60.92	19.41	19.68	0.77	1.41
OH Non-MSA Areas	427	4.25	63.03	56.21	64.40	16.86	18.74	0.87	1.24

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.60% of small loans to businesses originated and purchased by the bank.

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS			Geography: OHIO		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
17460 Cleveland OH	1	1.89	96.61	0.00	0.00	0.00	100.00	0.00	0.00
<b>Limited Review:</b>									
10420 Akron OH	4	7.55	96.95	100.00	100.00	0.00	0.00	1.64	2.50
15940 Canton OH	0	0.00	97.91	0.00	0.00	0.00	0.00	0.00	0.00
18140 Columbus OH	0	0.00	94.67	0.00	0.00	0.00	0.00	0.00	0.00
19380 Dayton OH	6	11.32	96.84	100.00	50.00	50.00	0.00	0.00	0.00
31900 Mansfield OH	0	0.00	98.22	0.00	0.00	0.00	0.00	0.00	0.00
41780 Sandusky OH	3	5.66	96.71	100.00	100.00	0.00	0.00	5.56	7.14
44220 Springfield OH	3	5.66	96.91	100.00	100.00	0.00	0.00	0.00	0.00
45780 Toledo OH	1	1.89	96.64	100.00	100.00	0.00	0.00	0.00	0.00
49660 Youngstown OH	0	0.00	97.67	0.00	0.00	0.00	0.00	0.00	0.00
OH Non-MSA Areas	35	66.04	98.19	94.29	71.43	22.86	5.71	3.18	3.70

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
17460 Cleveland OH	111	24,997	310	35,892	421	60,889	37.24	80	19,461
<b>Limited Review</b>									
10420 Akron OH	30	2,771	52	5,735	82	8,506	5.20	32	3,338
15940 Canton OH	12	924	15	2,028	27	2,952	1.81	12	1,783
18140 Columbus OH	52	4,844	64	22,705	116	27,549	16.85	52	7,655
19380 Dayton OH	37	2,499	24	8,795	61	11,295	6.91	32	5,288
31900 Mansfield OH	11	1,047	10	1,155	21	2,203	1.35	12	809
41780 Sandusky OH	0	0	2	123	2	123	.08	1	100
44220 Springfield OH	6	594	4	1,996	10	2,589	1.58	4	1,205
45780 Toledo OH	18	1,777	43	10,378	61	12,155	7.43	21	7,118
49660 Youngstown OH	21	1,026	22	2,918	43	3,944	2.41	17	1,872
OH Non-MSA Areas	21	1,771	11	1,893	32	3,664	2.24	22	1,463
<b>Statewide Qualified Investments with potential benefit to one or more AAs</b>	96	5,734	66	21,918	162	27,652	16.91	116	16,451

\* '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: SEPT 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Deposits % of Rated Area Deposits in AA	Branches						Branch Openings/Closings						Population								
		# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
<b>Full Review:</b>																						
17460 Cleveland OH	61.52	68	32.23	11.76	13.24	39.71	35.29	6	6	0	-1	+1	0	9.74	16.77	43.79	29.67					
<b>Limited Review:</b>																						
10420 Akron OH	6.24	20	9.48	15.00	20.00	30.00	35.00	0	0	0	0	0	0	6.29	21.45	48.11	24.15					
15940 Canton OH	3.82	14	6.64	0.00	7.14	64.29	28.57	1	0	0	0	0	+1	1.88	17.09	62.40	18.63					
18140 Columbus OH	6.93	26	12.32	3.85	23.08	38.46	34.62	9	2	0	0	+3	+4	8.77	23.52	36.11	31.60					
19380 Dayton OH	5.66	20	9.48	0.00	20.00	50.00	30.00	0	0	0	0	0	0	3.98	23.85	43.48	28.70					
31900 Mansfield OH	1.33	6	2.84	0.00	50.00	16.67	33.33	0	0	0	0	0	0	2.08	17.95	56.06	23.91					
41780 Sandusky OH	1.28	5	2.37	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	24.16	61.49	14.35					
44220 Springfield OH	0.86	3	1.42	0.00	33.33	66.67	0.00	0	1	0	0	-1	0	3.37	15.18	57.07	24.38					
45780 Toledo OH	8.53	27	12.80	3.70	14.81	51.85	29.63	1	1	0	0	0	0	6.14	17.69	52.10	24.07					
49660 Youngstown OH	0.69	6	2.84	0.00	0.00	33.33	66.67	1	1	0	-1	0	+1	4.61	15.87	58.03	21.49					
OH Non-MSA Areas	3.14	16	7.58	0.00	12.50	87.50	0.00	0	1	0	0	-1	0	0.00	8.34	73.42	18.23					

**Table 1. Lending Volume**

LENDING VOLUME		Geography: NEW YORK						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
10580 Albany NY	17.07	1,815	149,071	1,904	351,034	0	0	13	144,890	3,732	644,995	32.92
15380 Buffalo NY	19.00	2,785	159,677	1,274	187,082	8	334	85	203,687	4,152	550,780	21.89
<b>Limited Review:</b>												
24020 Glens Falls NY	0.80	118	10,720	58	6,829	0	0	0	0	176	17,549	0.35
28740 Kingston NY	3.60	524	49,511	249	33,306	14	2,580	0	0	787	85,397	2.38
35644 New York NY	4.66	800	121,672	208	33,040	0	0	10	35,700	1,018	190,412	2.09
39100 Poughkeepsie NY	9.27	1,530	171,964	471	66,908	7	485	18	53,416	2,026	292,773	7.82
40380 Rochester NY	8.16	1,247	59,013	487	104,699	18	2,203	31	100,310	1,783	266,225	4.50
45060 Syracuse NY	13.73	1,785	105,392	1,190	197,675	7	922	18	60,238	3,000	364,227	13.09
46540 Utica NY	1.80	303	12,750	86	10,903	0	0	5	20,937	394	44,590	0.51
NY Non-MSA Areas	21.91	3,485	198,349	1,245	184,437	40	3,249	18	41,685	4,788	427,720	14.45
Statewide CD Loans with potential benefit to one or more AAs								32	63,818			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
10580 Albany NY	292	14.68	2.78	4.45	13.35	14.04	53.66	50.34	30.21	31.16	0.27	0.15	0.14	0.26	0.40	
15380 Buffalo NY	515	25.89	4.34	3.69	13.17	16.31	51.87	51.26	30.61	28.74	0.71	1.26	1.02	0.78	0.45	
<b>Limited Review:</b>																
24020 Glens Falls NY	14	0.70	0.00	0.00	10.09	7.14	59.90	35.71	30.01	57.14	0.13	0.00	0.65	0.11	0.00	
28740 Kingston NY	35	1.76	0.00	0.00	8.34	11.43	76.90	85.71	14.76	2.86	0.20	0.00	0.00	0.26	0.00	
35644 New York NY	14	0.70	0.37	0.00	1.81	7.14	8.91	7.14	88.90	85.71	0.01	0.00	0.00	0.00	0.01	
39100 Poughkeepsie NY	80	4.02	2.07	8.75	8.38	13.75	66.59	63.75	22.96	13.75	0.13	0.24	0.15	0.10	0.16	
40380 Rochester NY	152	7.64	3.69	1.97	10.69	26.32	51.40	44.74	34.21	26.97	0.16	0.00	0.33	0.16	0.11	
45060 Syracuse NY	245	12.32	2.33	4.08	11.70	11.02	55.10	46.12	30.87	38.78	0.29	0.48	0.36	0.17	0.42	
46540 Utica NY	32	1.61	3.44	6.25	10.51	9.38	56.56	59.38	29.49	25.00	0.17	1.01	0.22	0.11	0.19	
NY Non-MSA Areas	610	30.67	0.10	0.00	6.34	9.02	80.23	81.15	13.33	9.84	0.84	0.00	0.86	0.86	0.74	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
10580 Albany NY	672	11.82	2.78	2.38	13.35	15.48	53.66	54.91	30.21	27.23	3.51	1.67	2.68	3.75	3.65	
15380 Buffalo NY	1,049	18.45	4.34	2.76	13.17	14.49	51.87	53.10	30.61	29.65	5.85	4.79	5.99	5.37	6.78	
<b>Limited Review:</b>																
24020 Glens Falls NY	45	0.79	0.00	0.00	10.09	4.44	59.90	68.89	30.01	26.67	1.06	0.00	0.00	1.25	1.20	
28740 Kingston NY	165	2.90	0.00	0.00	8.34	10.91	76.90	75.76	14.76	13.33	3.76	0.00	3.17	3.55	5.52	
35644 New York NY	220	3.87	0.37	0.00	1.81	6.82	8.91	9.09	88.90	84.09	1.30	0.00	3.96	1.33	1.22	
39100 Poughkeepsie NY	488	8.58	2.07	3.48	8.38	10.04	66.59	65.57	22.96	20.90	2.76	6.52	3.35	2.71	2.24	
40380 Rochester NY	716	12.59	3.69	5.31	10.69	17.74	51.40	58.52	34.21	18.44	2.65	1.07	3.28	2.61	2.65	
45060 Syracuse NY	845	14.86	2.33	2.01	11.70	12.07	55.10	59.64	30.87	26.27	4.55	7.14	4.39	4.41	4.74	
46540 Utica NY	157	2.76	3.44	6.37	10.51	9.55	56.56	57.96	29.49	26.11	1.68	1.02	1.30	1.92	1.49	
NY Non-MSA Areas	1,328	23.36	0.10	0.08	6.34	7.45	80.23	82.38	13.33	10.09	3.88	0.00	5.75	3.81	3.41	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: NEW YORK				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
<b>Full Review:</b>															
10580 Albany NY	849	12.68	2.78	2.47	13.35	14.02	53.66	55.83	30.21	27.68	1.40	1.16	1.40	1.35	1.53
15380 Buffalo NY	1,217	18.17	4.34	2.63	13.17	12.24	51.87	53.90	30.61	31.22	2.48	2.35	2.07	2.80	2.13
<b>Limited Review:</b>															
24020 Glens Falls NY	59	0.88	0.00	0.00	10.09	16.95	59.90	42.37	30.01	40.68	0.76	0.00	1.20	0.52	1.12
28740 Kingston NY	322	4.81	0.00	0.00	8.34	9.63	76.90	79.50	14.76	10.87	2.16	0.00	1.32	2.35	1.73
35644 New York NY	564	8.42	0.37	0.35	1.81	3.55	8.91	10.82	88.90	85.28	0.61	0.44	0.41	0.31	0.67
39100 Poughkeepsie NY	961	14.35	2.07	1.87	8.38	11.45	66.59	66.29	22.96	20.40	1.51	0.67	1.55	1.56	1.51
40380 Rochester NY	376	5.61	3.69	3.72	10.69	14.89	51.40	57.71	34.21	23.67	0.64	0.76	1.17	0.72	0.32
45060 Syracuse NY	694	10.36	2.33	1.44	11.70	9.80	55.10	55.33	30.87	33.43	2.32	1.79	1.98	2.42	2.29
46540 Utica NY	113	1.69	3.44	6.19	10.51	12.39	56.56	66.37	29.49	15.04	1.86	5.88	2.74	1.86	1.30
NY Non-MSA Areas	1,542	23.03	0.10	0.00	6.34	6.42	80.23	83.01	13.33	10.57	2.73	0.00	2.52	2.96	1.66

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
10580 Albany NY	2	10.53	18.98	0.00	14.82	0.00	46.89	100.00	19.32	0.00	1.02	0.00	0.00	2.27	0.00
15380 Buffalo NY	3	15.79	18.07	0.00	14.71	0.00	43.80	33.33	23.42	66.67	2.73	0.00	0.00	1.89	7.69
<b>Limited Review:</b>															
24020 Glens Falls NY	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
28740 Kingston NY	2	10.53	0.00	0.00	30.39	0.00	63.99	100.00	5.62	0.00	0.00	0.00	0.00	0.00	0.00
35644 New York NY	1	5.26	3.27	0.00	15.53	0.00	27.12	100.00	54.08	0.00	0.00	0.00	0.00	0.00	0.00
39100 Poughkeepsie NY	1	5.26	15.63	0.00	20.85	0.00	59.37	100.00	4.16	0.00	1.56	0.00	0.00	3.03	0.00
40380 Rochester NY	3	15.79	16.21	66.67	18.65	0.00	43.15	33.33	21.99	0.00	1.89	4.00	0.00	2.38	0.00
45060 Syracuse NY	1	5.26	26.31	0.00	23.07	0.00	34.40	100.00	16.22	0.00	1.41	0.00	0.00	3.45	0.00
46540 Utica NY	1	5.26	26.85	0.00	27.54	0.00	30.15	100.00	15.45	0.00	7.69	0.00	0.00	16.67	0.00
NY Non-MSA Areas	5	26.32	2.41	0.00	19.27	0.00	70.46	80.00	7.86	20.00	2.08	0.00	0.00	1.33	11.11

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
<b>Full Review:</b>																
10580 Albany NY	1,904	26.63	11.82	11.87	13.66	14.81	48.76	45.38	25.75	27.94	1.65	2.81	2.17	1.53	1.51	
15380 Buffalo NY	1,254	17.54	9.31	9.81	13.03	11.48	45.89	45.93	29.96	32.78	1.08	1.50	1.04	1.06	1.08	
<b>Limited Review:</b>																
24020 Glens Falls NY	58	0.81	0.00	0.00	15.43	12.07	53.56	55.17	31.01	32.76	0.44	0.00	0.89	0.31	0.52	
28740 Kingston NY	249	3.48	0.00	0.00	11.42	12.85	75.07	73.09	13.52	14.06	0.63	0.00	0.57	0.66	0.77	
35644 New York NY	208	2.91	1.34	3.85	7.68	6.25	14.19	9.62	76.77	80.29	0.05	0.24	0.06	0.03	0.05	
39100 Poughkeepsie NY	471	6.59	7.51	5.73	12.39	11.89	61.35	62.85	18.74	19.53	0.36	0.20	0.43	0.42	0.27	
40380 Rochester NY	487	6.81	9.60	13.55	13.54	14.58	46.06	43.53	30.68	28.34	0.40	0.89	0.60	0.39	0.28	
45060 Syracuse NY	1,190	16.64	12.89	13.45	12.54	9.83	49.31	52.44	25.26	24.29	1.51	2.61	1.27	1.55	1.28	
46540 Utica NY	86	1.20	11.80	10.47	13.67	30.23	49.63	19.77	24.89	39.53	0.23	0.00	0.65	0.12	0.31	
NY Non-MSA Areas	1,243	17.38	1.10	0.80	10.51	13.52	76.20	75.95	12.14	9.73	0.87	0.00	1.06	0.95	0.68	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
<b>Full Review:</b>																
10580 Albany NY	0	0.00	1.68	0.00	13.80	0.00	57.60	0.00	26.92	0.00	0.00	0.00	0.00	0.00	0.00	
15380 Buffalo NY	8	8.51	1.81	0.00	4.68	0.00	59.33	0.00	33.69	100.00	1.25	0.00	0.00	0.00	3.17	
<b>Limited Review:</b>																
24020 Glens Falls NY	0	0.00	0.00	0.00	7.89	0.00	50.88	0.00	41.23	0.00	0.00	0.00	0.00	0.00	0.00	
28740 Kingston NY	14	14.89	0.00	0.00	4.41	0.00	73.13	100.00	22.47	0.00	11.11	0.00	0.00	13.89	0.00	
35644 New York NY	0	0.00	0.49	0.00	3.20	0.00	11.91	0.00	84.40	0.00	0.00	0.00	0.00	0.00	0.00	
39100 Poughkeepsie NY	7	7.45	0.95	0.00	7.72	0.00	63.88	14.29	27.45	85.71	3.91	0.00	0.00	1.35	11.76	
40380 Rochester NY	18	19.15	1.28	0.00	5.79	0.00	63.58	83.33	29.34	16.67	1.66	0.00	0.00	1.74	2.04	
45060 Syracuse NY	7	7.45	1.95	0.00	10.27	42.86	54.05	42.86	33.73	14.29	0.49	0.00	0.00	0.78	0.00	
46540 Utica NY	0	0.00	1.36	0.00	4.87	0.00	72.71	0.00	21.05	0.00	0.00	0.00	0.00	0.00	0.00	
NY Non-MSA Areas	40	42.55	0.15	0.00	2.74	0.00	83.35	87.50	13.76	12.50	0.85	0.00	0.00	0.87	0.93	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families6	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
10580 Albany NY	292	14.68	19.23	10.71	18.71	20.71	23.17	23.21	38.88	45.36	0.30	0.29	0.19	0.23	0.40
15380 Buffalo NY	515	25.89	20.37	19.48	18.07	30.22	22.08	22.66	39.48	27.63	0.81	1.77	1.01	0.62	0.56
<b>Limited Review:</b>															
24020 Glens Falls NY	14	0.70	17.32	7.69	18.14	23.08	23.62	7.69	40.93	61.54	0.15	0.00	0.00	0.00	0.25
28740 Kingston NY	35	1.76	19.23	5.71	18.20	22.86	23.74	22.86	38.83	48.57	0.24	0.00	0.00	0.25	0.29
35644 New York NY	14	0.70	11.98	0.00	10.12	0.00	14.24	7.14	63.66	92.86	0.01	0.00	0.00	0.00	0.01
39100 Poughkeepsie NY	80	4.02	19.14	9.21	18.04	30.26	24.40	35.53	38.41	25.00	0.13	0.33	0.29	0.21	0.04
40380 Rochester NY	152	7.64	19.57	21.33	17.94	38.67	22.77	18.67	39.71	21.33	0.18	0.48	0.19	0.15	0.09
45060 Syracuse NY	245	12.32	20.27	14.35	18.30	20.68	21.84	24.47	39.58	40.51	0.32	0.34	0.29	0.23	0.38
46540 Utica NY	32	1.61	19.49	15.63	17.60	28.13	22.45	21.88	40.46	34.38	0.19	0.85	0.12	0.11	0.17
NY Non-MSA Areas	610	30.67	18.77	11.26	18.89	31.29	22.93	24.01	39.42	33.44	0.98	2.36	1.88	0.72	0.70

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

6 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families <sup>7</sup>	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
10580 Albany NY	672	11.82	19.23	12.84	18.71	24.01	23.17	28.59	38.88	34.56	3.44	3.08	2.71	3.29	4.17	
15380 Buffalo NY	1,050	18.47	20.37	11.86	18.07	20.54	22.08	26.42	39.48	41.18	6.28	5.43	4.54	5.94	8.02	
<b>Limited Review:</b>																
24020 Glens Falls NY	45	0.79	17.32	6.67	18.14	28.89	23.62	31.11	40.93	33.33	1.09	0.00	0.88	1.39	1.20	
28740 Kingston NY	165	2.90	19.23	19.51	18.20	25.61	23.74	18.90	38.83	35.98	4.09	13.70	6.67	1.98	3.08	
35644 New York NY	220	3.87	11.98	0.46	10.12	5.02	14.24	14.16	63.66	80.37	1.45	2.70	1.76	1.44	1.41	
39100 Poughkeepsie NY	488	8.58	19.14	8.44	18.04	16.67	24.40	28.40	38.41	46.50	3.00	4.26	2.72	2.93	2.97	
40380 Rochester NY	716	12.59	19.57	11.20	17.94	29.13	22.77	33.05	39.71	26.61	2.73	2.28	2.32	3.34	2.87	
45060 Syracuse NY	845	14.86	20.27	12.95	18.30	22.33	21.84	23.52	39.58	41.21	4.69	5.53	3.93	3.44	6.08	
46540 Utica NY	157	2.76	19.49	10.32	17.60	13.55	22.45	29.03	40.46	47.10	1.67	1.96	0.46	1.90	2.30	
NY Non-MSA Areas	1,328	23.36	18.77	9.44	18.89	20.85	22.93	31.05	39.42	38.66	3.98	2.76	3.52	4.70	3.99	

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

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

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

<sup>7</sup> 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families***	% BANK Loans****	% Families <sup>8</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
10580 Albany NY	849	12.68	19.23	12.52	18.71	26.01	23.17	28.22	38.88	33.25	1.62	2.40	1.95	1.55	1.33	
15380 Buffalo NY	1,217	18.17	20.37	11.17	18.07	25.63	22.08	30.63	39.48	32.57	2.94	4.68	3.28	2.96	2.39	
<b>Limited Review:</b>																
24020 Glens Falls NY	59	0.88	17.32	12.28	18.14	22.81	23.62	24.56	40.93	40.35	0.90	1.89	0.88	1.25	0.61	
28740 Kingston NY	322	4.81	19.23	8.33	18.20	25.32	23.74	36.54	38.83	29.81	2.70	3.30	4.38	3.30	1.63	
35644 New York NY	565	8.44	11.98	1.77	10.12	7.62	14.24	21.63	63.66	68.97	0.76	1.96	1.21	1.26	0.65	
39100 Poughkeepsie NY	961	14.35	19.14	6.15	18.04	25.13	24.40	37.43	38.41	31.28	1.83	2.28	2.92	1.96	1.27	
40380 Rochester NY	376	5.61	19.57	14.02	17.94	32.88	22.77	26.15	39.71	26.95	0.73	1.46	0.99	0.68	0.33	
45060 Syracuse NY	694	10.36	20.27	9.88	18.30	23.50	21.84	30.24	39.58	36.38	2.71	3.44	3.83	2.30	2.23	
46540 Utica NY	113	1.69	19.49	8.93	17.60	38.39	22.45	27.68	40.46	25.00	2.14	2.38	3.89	1.90	1.32	
NY Non-MSA Areas	1,542	23.02	18.77	7.66	18.89	22.27	22.93	32.15	39.42	37.92	3.27	5.44	4.55	3.75	2.35	

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by bank.

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

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

<sup>8</sup> 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 31, 2007				Geography: NEW YORK			Evaluation Period: JANUARY 1, 2004 TO DECEMBER			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
10580 Albany NY	1,904	26.55	62.41	48.48	55.72	20.64	23.63	1.65	2.35	
15380 Buffalo NY	1,274	17.76	63.12	58.63	66.56	14.99	18.45	1.08	1.78	
<b>Limited Review:</b>										
24020 Glens Falls NY	58	0.81	63.42	55.17	67.24	17.24	15.52	0.44	0.90	
28740 Kingston NY	249	3.47	68.68	55.42	69.88	14.06	16.06	0.63	0.89	
35644 New York NY	208	2.90	70.34	48.08	63.94	15.87	20.19	0.05	0.08	
39100 Poughkeepsie NY	471	6.57	68.30	59.66	68.79	16.14	15.07	0.36	0.75	
40380 Rochester NY	487	6.79	64.47	47.02	52.16	18.07	29.77	0.40	0.49	
45060 Syracuse NY	1,190	16.59	63.60	47.98	59.58	19.66	20.76	1.51	1.97	
46540 Utica NY	86	1.20	60.03	46.51	66.28	24.42	9.30	0.23	0.32	
NY Non-MSA Areas	1,245	17.36	57.73	58.80	66.83	16.71	16.47	0.87	1.28	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.47% 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
10580 Albany NY	0	0.00	97.11	0.00	0.00	0.00	0.00	0.00	0.00
15380 Buffalo NY	8	8.51	95.20	87.50	100.00	0.00	0.00	1.25	1.67
<b>Limited Review:</b>									
24020 Glens Falls NY	0	0.00	96.49	0.00	0.00	0.00	0.00	0.00	0.00
28740 Kingston NY	14	14.89	94.27	21.43	42.86	35.71	21.43	11.11	6.45
35644 New York NY	0	0.00	94.40	0.00	0.00	0.00	0.00	0.00	0.00
39100 Poughkeepsie NY	7	7.45	95.70	85.71	85.71	14.29	0.00	3.91	4.49
40380 Rochester NY	18	19.15	95.49	38.89	61.11	22.22	16.67	1.66	0.90
45060 Syracuse NY	7	7.45	95.65	71.43	57.14	14.29	28.57	0.49	0.60
46540 Utica NY	0	0.00	97.47	0.00	0.00	0.00	0.00	0.00	0.00
NY Non-MSA Areas	40	42.55	96.61	85.00	75.00	17.50	7.50	0.85	1.01

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.06% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW YORK				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
10580 Albany NY	4	3,038	51	19,547	55	22,585	13.22	6	13,264	
15380 Buffalo NY	7	3,602	61	10,487	68	14,089	8.24	11	2,136	
<b>Limited Review:</b>										
24020 Glens Falls NY	0	0	1	210	1	210	.12	1	19	
28740 Kingston NY	1	40	3	823	4	863	.51	2	404	
35644 New York NY	5	148	17	5,210	22	5,358	3.14	7	3,750	
39100 Poughkeepsie NY	15	1,546	19	3,185	34	4,730	2.77	11	1,650	
40380 Rochester NY	30	904	43	10,531	73	11,436	6.69	26	8,301	
45060 Syracuse NY	8	3,023	38	33,150	46	36,173	21.17	8	18,825	
46540 Utica NY	6	4,558	7	21,176	13	25,734	15.06	3	228	
NY Non-MSA Areas	7	1,102	22	12,124	29	13,226	7.74	14	7,137	
<b>Statewide Qualified Investments with potential benefit to one or more AAs</b>	5	2,130	18	34,360	23	36,490	21.35	19	12,661	

\* '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: SEPT 1, 2003 TO JUNE 30, 2008																	
MA/Assessment Area:	Deposits % of Rated Area Deposits in AA	Branches						Branch Openings/Closings						Population			
		# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
10580 Albany NY	32.92	40	17.24	15.00	12.50	50.00	22.50	2	5	-2	0	-1	0	7.34	16.25	50.39	25.85
15380 Buffalo NY	21.89	37	15.95	10.81	13.51	51.35	24.32	0	1	-1	0	0	0	8.78	16.45	47.62	26.35
<b>Limited Review:</b>																	
24020 Glens Falls NY	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
28740 Kingston NY	2.38	10	4.31	0.00	10.00	80.00	10.00	0	0	0	0	0	0	0.00	11.46	75.10	13.44
35644 New York NY	2.09	31	13.36	0.00	9.68	19.35	70.97	1	0	0	0	+1	0	2.01	7.13	16.09	74.77
39100 Poughkeepsie NY	7.82	18	7.76	11.11	5.56	77.78	5.56	1	1	0	0	0	0	7.18	11.97	62.07	18.75
40380 Rochester NY	4.50	15	6.47	13.33	26.67	40.00	20.00	0	0	0	0	0	0	9.01	13.17	48.18	29.00
45060 Syracuse NY	13.09	29	12.50	10.34	24.14	44.83	20.69	1	1	+1	0	-1	0	8.20	15.32	49.06	27.42
46540 Utica NY	0.51	2	0.86	50.00	0.00	0.00	50.00	0	0	0	0	0	0	7.58	14.97	51.87	25.56
NY Non-MSA Areas	14.45	49	21.12	4.17	16.67	68.75	10.42	0	0	0	0	0	0	0.52	9.72	76.72	12.23

\* One branch in the NY Non-MSA Areas AA is located in a NA census tract. Branch distribution percentages for this AA are based on the 48 branches located in census tracts with income designations.

**Table 1. Lending Volume**

LENDING VOLUME		Geography: WASHINGTON						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
42644 Seattle WA	43.39	3,341	489,830	3,941	837,883	26	4,290	66	198,251	7,374	1,530,254	61.00
45104 Tacoma WA	17.24	1,682	184,350	1,238	253,514	3	520	6	15,043	2,929	453,427	17.67
<b>Limited Review:</b>												
13380 Bellingham WA	3.66	291	33,176	317	40,974	13	2,351	1	581	622	77,082	2.78
14740 Bremerton WA	2.85	312	38,857	166	26,921	4	220	3	10,625	485	76,623	1.52
28420 Kennewick WA	3.37	253	18,396	154	45,040	166	37,266	0	0	573	100,702	1.00
31020 Longview WA	0.97	99	6,325	64	17,785	0	0	1	912	164	25,022	0.69
34580 Mt Vernon WA	1.18	119	14,346	75	16,081	6	1,010	1	4,351	201	35,788	0.77
36500 Olympia WA	5.48	589	58,995	342	39,725	0	0	0	0	931	98,720	3.89
48300 Wenatchee WA	2.12	155	16,714	86	15,188	120	19,569	0	0	361	51,471	0.72
49420 Yakima WA	4.62	252	17,718	289	79,959	243	48,344	1	2,400	785	148,421	1.80
WA Non-MSA Areas	15.12	1,529	139,032	550	68,190	489	88,773	1	3,391	2,569	299,386	8.16
Statewide CD Loans with potential benefit to one or more AAs								7	28,999			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
42644 Seattle WA	477	46.00	0.49	0.42	15.58	16.14	55.45	55.56	28.48	27.88	0.09	0.09	0.07	0.09	0.12	
45104 Tacoma WA	156	15.04	0.50	2.56	10.96	16.03	63.09	58.97	25.46	22.44	0.11	0.00	0.08	0.12	0.09	
<b>Limited Review:</b>																
13380 Bellingham WA	20	1.93	0.00	0.00	8.83	10.00	71.28	80.00	19.90	10.00	0.06	0.00	0.00	0.09	0.00	
14740 Bremerton WA	29	2.80	1.75	0.00	9.31	3.45	69.62	65.52	19.32	31.03	0.08	0.00	0.07	0.07	0.14	
28420 Kennewick WA	20	1.93	2.95	0.00	13.08	5.00	55.11	60.00	28.86	35.00	0.03	0.00	0.00	0.05	0.00	
31020 Longview WA	13	1.25	2.18	0.00	10.31	15.38	66.32	69.23	21.20	15.38	0.03	0.00	0.00	0.00	0.17	
34580 Mt Vernon WA	12	1.16	0.00	0.00	9.11	0.00	71.16	91.67	19.73	8.33	0.05	0.00	0.00	0.06	0.00	
36500 Olympia WA	67	6.46	0.00	0.00	12.34	10.45	68.09	70.15	19.57	19.40	0.06	0.00	0.00	0.08	0.00	
48300 Wenatchee WA	42	4.05	0.00	0.00	18.55	11.90	54.40	59.52	27.04	28.57	0.41	0.00	0.36	0.57	0.22	
49420 Yakima WA	39	3.76	1.43	0.00	22.04	15.38	38.95	46.15	37.58	38.46	0.15	0.00	0.08	0.32	0.04	
WA Non-MSA Areas	162	15.62	0.00	0.00	8.38	13.58	73.97	71.60	17.65	14.81	0.23	0.00	0.30	0.27	0.08	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
42644 Seattle WA	945	37.94	0.49	0.74	15.58	18.84	55.45	60.32	28.48	20.11	2.85	3.85	3.26	3.07	2.02	
45104 Tacoma WA	455	18.27	0.50	1.10	10.96	10.99	63.09	65.05	25.46	22.86	2.84	18.75	1.94	2.76	3.15	
<b>Limited Review:</b>																
13380 Bellingham WA	81	3.25	0.00	0.00	8.83	9.88	71.28	75.31	19.90	14.81	2.84	0.00	4.71	2.57	2.99	
14740 Bremerton WA	119	4.78	1.75	2.52	9.31	14.29	69.62	68.91	19.32	14.29	2.69	2.86	4.03	2.71	1.27	
28420 Kennewick WA	83	3.33	2.95	2.41	13.08	7.23	55.11	60.24	28.86	30.12	2.42	3.13	0.00	3.26	1.58	
31020 Longview WA	51	2.05	2.18	3.92	10.31	7.84	66.32	74.51	21.20	13.73	3.46	0.00	10.34	3.02	3.19	
34580 Mt Vernon WA	28	1.12	0.00	0.00	9.11	7.14	71.16	78.57	19.73	14.29	0.79	0.00	0.00	1.08	0.00	
36500 Olympia WA	161	6.46	0.00	0.00	12.34	13.66	68.09	73.29	19.57	13.04	3.97	0.00	2.90	3.90	4.98	
48300 Wenatchee WA	39	1.57	0.00	0.00	18.55	20.51	54.40	51.28	27.04	28.21	1.70	0.00	1.54	1.90	1.47	
49420 Yakima WA	89	3.57	1.43	0.00	22.04	17.98	38.95	48.31	37.58	33.71	3.13	0.00	2.86	3.54	3.00	
WA Non-MSA Areas	440	17.66	0.00	0.00	8.38	8.86	73.97	77.50	17.65	13.64	5.83	0.00	9.63	5.96	4.26	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
<b>Full Review:</b>															
42644 Seattle WA	1,893	37.40	0.49	0.42	15.58	17.22	55.45	59.32	28.48	23.03	0.54	0.55	0.51	0.55	0.53
45104 Tacoma WA	1,067	21.08	0.50	0.66	10.96	7.31	63.09	68.51	25.46	23.52	0.70	1.55	0.44	0.82	0.51
<b>Limited Review:</b>															
13380 Bellingham WA	190	3.75	0.00	0.00	8.83	6.84	71.28	65.26	19.90	27.89	0.91	0.00	1.10	0.80	1.25
14740 Bremerton WA	162	3.20	1.75	0.62	9.31	9.26	69.62	78.40	19.32	11.73	0.30	0.00	0.23	0.37	0.11
28420 Kennewick WA	149	2.94	2.95	4.70	13.08	16.78	55.11	53.02	28.86	25.50	0.44	0.81	0.44	0.53	0.24
31020 Longview WA	35	0.69	2.18	0.00	10.31	2.86	66.32	82.86	21.20	14.29	0.20	0.00	0.00	0.25	0.14
34580 Mt Vernon WA	79	1.56	0.00	0.00	9.11	11.39	71.16	70.89	19.73	17.72	0.69	0.00	0.63	0.63	1.04
36500 Olympia WA	361	7.13	0.00	0.00	12.34	18.01	68.09	69.25	19.57	12.74	0.96	0.00	1.44	0.92	0.75
48300 Wenatchee WA	74	1.46	0.00	0.00	18.55	18.92	54.40	45.95	27.04	35.14	0.59	0.00	1.05	0.46	0.53
49420 Yakima WA	124	2.45	1.43	0.81	22.04	24.19	38.95	39.52	37.58	35.48	0.65	0.00	1.42	0.54	0.41
WA Non-MSA Areas	927	18.32	0.00	0.00	8.38	11.97	73.97	73.89	17.65	14.13	1.09	0.00	2.27	1.05	0.90

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
42644 Seattle WA	26	78.79	3.72	0.00	36.96	30.77	43.29	38.46	16.04	30.77	1.27	0.00	0.87	1.52	1.85	
45104 Tacoma WA	4	12.12	8.47	0.00	29.99	25.00	52.41	50.00	9.13	25.00	0.76	0.00	0.00	1.67	0.00	
<b>Limited Review:</b>																
13380 Bellingham WA	0	0.00	0.00	0.00	27.18	0.00	62.25	0.00	10.58	0.00	0.00	0.00	0.00	0.00	0.00	
14740 Bremerton WA	2	6.06	9.25	0.00	28.01	0.00	54.98	50.00	7.76	50.00	0.00	0.00	0.00	0.00	0.00	
28420 Kennewick WA	1	3.03	18.46	0.00	22.92	100.00	45.18	0.00	13.44	0.00	4.17	0.00	20.00	0.00	0.00	
31020 Longview WA	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	
34580 Mt Vernon WA	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	
36500 Olympia WA	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	
48300 Wenatchee WA	0	0.00	0.00	0.00	38.67	0.00	51.29	0.00	10.04	0.00	0.00	0.00	0.00	0.00	0.00	
49420 Yakima WA	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	
WA Non-MSA Areas	0	0.00	0.00	0.00	18.94	0.00	75.34	0.00	5.72	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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: WASHINGTON				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
42644 Seattle WA	3,941	54.57	2.55	3.22	23.79	22.20	47.30	42.02	26.35	32.56	0.91	1.50	0.92	0.83	1.08
45104 Tacoma WA	1,238	17.14	1.98	1.13	21.77	24.47	55.38	49.68	20.87	24.72	1.26	2.27	1.84	1.05	1.35
<b>Limited Review:</b>															
13380 Bellingham WA	317	4.39	0.00	0.00	11.66	17.98	76.03	69.09	12.31	12.93	0.73	0.00	1.75	0.66	0.23
14740 Bremerton WA	166	2.30	3.55	4.22	11.69	7.23	62.98	59.04	21.78	29.52	0.60	0.50	0.12	0.65	0.76
28420 Kennewick WA	154	2.13	4.19	2.60	23.02	35.71	47.96	42.21	24.84	19.48	0.53	1.09	1.17	0.41	0.32
31020 Longview WA	64	0.89	1.58	3.13	22.28	32.81	64.22	57.81	11.92	6.25	0.72	0.00	1.23	0.65	0.52
34580 Mt Vernon WA	75	1.04	0.00	0.00	18.55	16.00	66.42	61.33	15.03	22.67	0.50	0.00	0.68	0.44	0.63
36500 Olympia WA	342	4.74	0.00	0.00	22.33	18.13	63.99	72.22	13.68	9.65	1.05	0.00	1.01	1.23	0.63
48300 Wenatchee WA	86	1.19	0.00	0.00	23.82	18.60	58.78	59.30	17.40	22.09	0.59	0.00	0.52	0.65	0.67
49420 Yakima WA	289	4.00	10.11	11.07	23.04	22.84	38.68	42.91	28.17	23.18	1.25	1.63	1.43	1.51	0.88
WA Non-MSA Areas	550	7.62	0.00	0.00	11.63	8.36	72.61	77.82	15.76	13.82	0.72	0.00	0.76	0.83	0.51

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
<b>Full Review:</b>																
42644 Seattle WA	26	2.43	1.07	0.00	16.43	11.54	58.03	88.46	24.47	0.00	1.70	0.00	0.00	2.61	0.00	
45104 Tacoma WA	3	0.28	1.17	0.00	13.09	100.00	61.38	0.00	24.35	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
13380 Bellingham WA	13	1.21	0.00	0.00	6.02	0.00	86.51	76.92	7.47	23.08	0.99	0.00	0.00	0.35	20.00	
14740 Bremerton WA	4	0.37	0.74	0.00	5.72	0.00	68.45	100.00	25.09	0.00	3.03	0.00	0.00	5.26	0.00	
28420 Kennewick WA	166	15.51	1.09	0.00	21.86	45.18	63.60	53.61	13.45	1.20	16.83	0.00	20.45	17.62	0.00	
31020 Longview WA	0	0.00	2.25	0.00	14.41	0.00	59.46	0.00	23.87	0.00	0.00	0.00	0.00	0.00	0.00	
34580 Mt Vernon WA	6	0.56	0.00	0.00	10.92	0.00	60.08	100.00	28.99	0.00	0.72	0.00	0.00	1.45	0.00	
36500 Olympia WA	0	0.00	0.00	0.00	19.31	0.00	65.31	0.00	15.38	0.00	0.00	0.00	0.00	0.00	0.00	
48300 Wenatchee WA	120	11.21	0.00	0.00	15.94	14.17	62.63	63.33	21.43	22.50	14.73	0.00	12.50	15.14	19.35	
49420 Yakima WA	243	22.71	1.12	0.82	11.90	4.94	68.02	82.30	18.96	11.93	14.29	0.00	9.80	15.77	12.16	
WA Non-MSA Areas	489	45.70	0.00	0.00	11.05	20.65	77.63	75.66	11.32	3.68	15.85	0.00	23.66	16.52	4.35	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 2007			Geography: WASHINGTON						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31,						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families <sup>9</sup>	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
42644 Seattle WA	477	46.00	18.50	5.51	18.70	16.10	24.54	18.43	38.26	59.96	0.11	0.12	0.12	0.07	0.14
45104 Tacoma WA	156	15.04	18.66	7.33	18.89	18.00	23.23	24.00	39.22	50.67	0.12	0.00	0.15	0.10	0.13
<b>Limited Review:</b>															
13380 Bellingham WA	20	1.93	18.16	15.00	18.66	20.00	23.94	20.00	39.24	45.00	0.07	0.00	0.14	0.06	0.06
14740 Bremerton WA	29	2.80	17.45	6.90	19.02	13.79	24.52	24.14	39.02	55.17	0.09	0.62	0.09	0.04	0.10
28420 Kennewick WA	20	1.93	20.23	5.00	18.40	35.00	21.76	20.00	39.61	40.00	0.04	0.13	0.10	0.00	0.00
31020 Longview WA	13	1.25	20.36	23.08	17.47	7.69	23.64	23.08	38.53	46.15	0.03	0.00	0.00	0.00	0.07
34580 Mt Vernon WA	12	1.16	18.11	0.00	18.93	16.67	23.36	33.33	39.60	50.00	0.06	0.00	0.00	0.11	0.05
36500 Olympia WA	67	6.46	17.26	13.85	18.90	18.46	25.85	24.62	37.98	43.08	0.06	0.57	0.14	0.03	0.04
48300 Wenatchee WA	42	4.05	19.86	0.00	19.12	37.50	21.01	17.50	40.01	45.00	0.47	0.00	1.32	0.12	0.44
49420 Yakima WA	39	3.76	20.45	15.79	18.68	23.68	20.51	21.05	40.36	39.47	0.16	0.41	0.00	0.23	0.16
WA Non-MSA Areas	162	15.62	18.55	10.13	18.38	17.09	23.63	26.58	39.44	46.20	0.27	1.28	0.24	0.32	0.22

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by bank.

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

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

<sup>9</sup> 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families 10	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
42644 Seattle WA	945	37.94	18.50	7.79	18.70	17.10	24.54	30.41	38.26	44.70	2.93	5.30	2.44	2.87	2.90	
45104 Tacoma WA	455	18.27	18.66	6.65	18.89	20.18	23.23	33.04	39.22	40.13	2.91	5.08	2.95	2.69	2.90	
<b>Limited Review:</b>																
13380 Bellingham WA	81	3.25	18.16	3.90	18.66	20.78	23.94	25.97	39.24	49.35	2.72	0.00	1.35	2.25	3.82	
14740 Bremerton WA	119	4.78	17.45	5.93	19.02	21.19	24.52	27.97	39.02	44.92	2.71	5.26	2.70	2.42	2.66	
28420 Kennewick WA	83	3.33	20.23	4.82	18.40	22.89	21.76	28.92	39.61	43.37	2.46	1.67	4.24	2.72	1.77	
31020 Longview WA	51	2.05	20.36	7.84	17.47	29.41	23.64	35.29	38.53	27.45	3.61	0.00	8.47	5.22	1.57	
34580 Mt Vernon WA	28	1.12	18.11	3.57	18.93	7.14	23.36	17.86	39.60	71.43	0.84	0.00	0.00	0.00	1.63	
36500 Olympia WA	161	6.46	17.26	9.43	18.90	14.47	25.85	38.36	37.98	37.74	4.11	8.93	4.00	3.80	3.86	
48300 Wenatchee WA	39	1.57	19.86	5.26	19.12	18.42	21.01	28.95	40.01	47.37	1.78	0.00	0.00	2.06	2.53	
49420 Yakima WA	89	3.57	20.45	3.37	18.68	21.35	20.51	31.46	40.36	43.82	3.17	0.00	2.80	4.27	3.06	
WA Non-MSA Areas	440	17.66	18.55	7.42	18.38	20.88	23.63	29.23	39.44	42.46	5.91	5.00	6.82	5.98	5.73	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

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

10 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families 11	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
42644 Seattle WA	1,893	37.40	18.50	6.66	18.70	19.10	24.54	25.71	38.26	48.53	0.65	1.13	0.79	0.53	0.64	
45104 Tacoma WA	1,067	21.08	18.66	6.61	18.89	19.43	23.23	29.68	39.22	44.28	0.84	2.37	1.07	0.93	0.66	
<b>Limited Review:</b>																
13380 Bellingham WA	190	3.75	18.16	4.89	18.66	9.78	23.94	24.46	39.24	60.87	1.11	2.47	0.41	1.07	1.24	
14740 Bremerton WA	162	3.20	17.45	10.13	19.02	18.99	24.52	35.44	39.02	35.44	0.36	0.33	0.84	0.32	0.23	
28420 Kennewick WA	149	2.94	20.23	15.07	18.40	27.40	21.76	24.66	39.61	32.88	0.56	0.74	0.97	0.54	0.34	
31020 Longview WA	35	0.69	20.36	8.82	17.47	14.71	23.64	35.29	38.53	41.18	0.21	0.00	0.37	0.19	0.19	
34580 Mt Vernon WA	79	1.56	18.11	3.85	18.93	20.51	23.36	28.21	39.60	47.44	0.85	1.27	1.00	0.21	1.15	
36500 Olympia WA	361	7.13	17.26	8.41	18.90	22.32	25.85	31.59	37.98	37.68	1.17	2.15	1.49	1.03	1.04	
48300 Wenatchee WA	74	1.46	19.86	8.57	19.12	12.86	21.01	37.14	40.01	41.43	0.76	2.38	0.52	0.75	0.73	
49420 Yakima WA	124	2.45	20.45	4.96	18.68	23.97	20.51	26.45	40.36	44.63	0.75	1.73	1.30	0.54	0.60	
WA Non-MSA Areas	927	18.32	18.55	4.40	18.38	19.03	23.63	25.08	39.44	51.49	1.30	1.21	2.13	1.21	1.15	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by bank.

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

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

11 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, 2004 TO DECEMBER 31, 2007					
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
42644 Seattle WA	3,941	54.57	70.55	60.11	54.17	17.96	27.86	0.91	1.53	
45104 Tacoma WA	1,238	17.14	70.60	65.19	55.01	19.55	25.44	1.26	2.09	
<b>Limited Review:</b>										
13380 Bellingham WA	317	4.39	71.27	64.98	70.66	15.14	14.20	0.73	1.22	
14740 Bremerton WA	166	2.30	74.33	73.49	59.04	22.29	18.67	0.60	1.33	
28420 Kennewick WA	154	2.13	68.28	39.61	40.26	16.88	42.86	0.53	0.47	
31020 Longview WA	64	0.89	69.01	43.75	48.44	20.31	31.25	0.72	0.78	
34580 Mt Vernon WA	75	1.04	70.21	56.00	56.00	14.67	29.33	0.50	0.75	
36500 Olympia WA	342	4.74	71.30	71.05	73.68	12.87	13.45	1.05	2.25	
48300 Wenatchee WA	86	1.19	68.27	76.74	60.47	20.93	18.60	0.59	1.24	
49420 Yakima WA	289	4.00	67.05	47.40	44.98	16.96	38.06	1.25	1.88	
WA Non-MSA Areas	550	7.62	72.02	70.36	67.27	19.27	13.45	0.72	1.40	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.68% 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
42644 Seattle WA	26	2.43	94.77	100.00	42.31	30.77	26.92	1.70	2.53
45104 Tacoma WA	3	0.28	95.00	100.00	66.67	0.00	33.33	0.00	0.00
<b>Limited Review:</b>									
13380 Bellingham WA	13	1.21	94.10	53.85	38.46	46.15	15.38	0.99	0.98
14740 Bremerton WA	4	0.37	97.05	100.00	100.00	0.00	0.00	3.03	3.85
28420 Kennewick WA	166	15.51	90.11	65.66	31.93	33.73	34.34	16.83	18.34
31020 Longview WA	0	0.00	95.95	0.00	0.00	0.00	0.00	0.00	0.00
34580 Mt Vernon WA	6	0.56	91.81	50.00	33.33	33.33	33.33	0.72	1.16
36500 Olympia WA	0	0.00	95.78	0.00	0.00	0.00	0.00	0.00	0.00
48300 Wenatchee WA	120	11.21	92.96	90.00	36.67	43.33	20.00	14.73	16.35
49420 Yakima WA	243	22.71	88.03	82.30	37.45	29.22	33.33	14.29	16.37
WA Non-MSA Areas	489	45.70	94.89	82.82	45.19	27.40	27.40	15.85	17.02

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.37% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WASHINGTON				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
42644 Seattle WA	53	3,417	177	25,336	230	28,754	52.24	47	11,926	
45104 Tacoma WA	3	186	29	11,084	32	11,270	20.47	5	6,831	
<b>Limited Review</b>										
13380 Bellingham WA	4	28	18	257	22	285	.51	3	49	
14740 Bremerton WA	13	757	5	1,933	18	2,691	4.89	7	1,466	
28420 Kennewick WA	0	0	4	18	4	18	.03	0	0	
31020 Longview WA	1	2,684	2	6	3	2,690	4.89	0	0	
34580 Mt Vernon WA	1	246	0	0	1	246	.45	0	0	
36500 Olympia WA	3	596	0	0	3	596	1.08	1	67	
48300 Wenatchee WA	1	21	1	77	2	98	.18	1	30	
49420 Yakima WA	0	0	13	7,786	13	7,786	14.15	2	7,727	
WA Non-MSA Areas	4	209	12	128	16	337	.61	1	85	
<b>Statewide Qualified Investments with potential benefit to one or more AAs</b>	1	276	0	0	1	276	.50	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: SEPT 1, 2003 TO JUNE 30, 2008																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
42644 Seattle WA	61.00	72	48.00	5.56	33.33	44.44	16.67	4	2	0	+1	+1	0	1.93	21.89	52.39	23.79
45104 Tacoma WA	17.67	28	18.67	3.57	7.14	75.00	14.29	0	2	0	-2	0	0	2.73	18.13	58.48	20.44
<b>Limited Review:</b>																	
13380 Bellingham WA	2.78	7	4.67	0.00	0.00	85.71	14.29	0	0	0	0	0	0	0.00	13.44	70.37	16.19
14740 Bremerton WA	1.52	5	3.33	0.00	20.00	60.00	20.00	0	0	0	0	0	0	3.15	16.39	63.80	16.66
28420 Kennewick WA	1.00	3	2.00	0.00	66.67	33.33	0.00	0	0	0	0	0	0	6.87	18.55	51.89	22.69
31020 Longview WA	0.69	1	0.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	4.85	16.59	61.75	16.81
34580 Mt Vernon WA	0.77	3	2.00	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	9.71	74.25	16.04
36500 Olympia WA	3.89	9	6.00	0.00	22.22	66.67	11.11	0	0	0	0	0	0	0.00	15.50	68.02	16.48
48300 Wenatchee WA	0.72	1	0.67	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	24.88	52.36	22.75
49420 Yakima WA	1.80	5	3.33	20.00	20.00	40.00	20.00	0	0	0	0	0	0	3.68	29.57	38.98	27.77
WA Non-MSA Areas	8.16	16	10.67	0.00	25.00	62.50	12.50	0	0	0	0	0	0	0.00	12.81	71.67	15.52

**Table 1. Lending Volume**

LENDING VOLUME		Geography: CINCINNATI MULTISTATE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
17140 Cincinnati MultiState	100.00	2,250	114,826	1,349	272,628	1	70	13	29,226	3,613	416,750	100.00

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: CINCINNATI MULTISTATE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
17140 Cincinnati MultiState	192	100.00	2.38	2.08	14.70	12.50	51.43	41.67	31.49	43.75	0.08	0.21	0.05	0.05	0.12

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: CINCINNATI MULTISTATE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
17140 Cincinnati MultiState	1,561	100.00	2.38	3.40	14.70	15.82	51.43	51.44	31.49	29.34	5.14	5.19	5.18	4.93	5.45	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CINCINNATI MULTISTATE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
17140 Cincinnati MultiState	489	100.00	2.38	1.64	14.70	11.04	51.43	50.31	31.49	37.01	0.30	0.37	0.20	0.30	0.34

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: CINCINNATI MULTISTATE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	II					
<b>Full Review:</b>																
17140 Cincinnati MultiState	7	100.00	17.48	14.29	22.32	28.57	43.96	28.57	16.23	28.57	2.30	2.00	2.20	1.71	4.35	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: CINCINNATI MULTISTATE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
17140 Cincinnati MultiState	1,329	100.00	5.68	4.82	17.55	15.12	47.92	41.91	28.01	38.15	0.58	0.62	0.58	0.55	0.61

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS      Geography: CINCINNATI MULTISTATE      Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
17140 Cincinnati MultiState	1	100.00	1.61	100.00	11.31	0.00	58.58	0.00	28.47	0.00	0.40	25.00	0.00	0.00	0.00

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: CINCINNATI MULTISTATE					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans**	% Families12	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
17140 Cincinnati MultiState	192	100.00	18.81	11.35	18.19	20.54	22.97	20.54	40.03	47.57	0.09	0.11	0.06	0.05	0.14	

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 3.6% of loans originated and purchased by bank.

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

\*\*\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area. 12 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: CINCINNATI MULTISTATE								Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
17140 Cincinnati MultiState	1,562	100.00	18.81	10.72	18.19	23.94	22.97	29.33	40.03	36.01	5.25	5.88	5.01	5.09	5.34

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

13 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: CINCINNATI MULTISTATE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 14	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
17140 Cincinnati MultiState	489	100.00	18.81	10.92	18.19	22.27	22.97	27.52	40.03	39.29	0.37	0.51	0.35	0.31	0.39

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by bank.

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

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

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

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CINCINNATI MULTISTATE			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
17140 Cincinnati MultiState	1,349	100.00	62.68	58.34	55.00	19.79	25.20	0.58	0.83

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.74% of small loans to businesses originated and purchased by the bank.

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: CINCINNATI MULTISTATE			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
17140 Cincinnati MultiState	1	100.00	96.16	0.00	100.00	0.00	0.00	0.40	0.00

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

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

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: CINCINNATI MULTISTATE				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
17140 Cincinnati MultiState	35	3,837	47	14,339	82	18,176	100.00	41	10,027

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\* '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 OPENINGS/CLOSINGS Geography: CINCINNATI MULTISTATE Evaluation Period: SEPT 1, 2003 TO JUNE 30, 2008																	
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
<b>Full Review:</b>																	
17140 Cincinnati MultiState	100.00	31	100.00	3.33	13.33	56.67	26.67	7	1	+1	+1	+2	+2	6.80	18.14	47.69	27.27

\* One branch is located in a NA census tract. Branch distribution percentages are based on the 30 branches located in census tracts with income designations.

**Table 1. Lending Volume**

LENDING VOLUME		Geography: PORTLAND MULTISTATE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007						
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
38900 Portland MultiState	100.00	2,478	315,728	3,363	673,952	126	22,803	53	120,821	6,020	1,133,304	100.00

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: PORTLAND MULTISTATE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38900 Portland MultiState	271	100.00	0.71	1.85	15.28	15.50	55.67	46.13	28.34	36.53	0.06	0.07	0.03	0.05	0.10

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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: PORTLAND MULTISTATE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38900 Portland MultiState	747	100.00	0.71	1.07	15.28	18.61	55.67	61.45	28.34	18.88	3.02	1.45	3.61	3.26	2.09

\* Based on 2006 Peer Mortgage Data (Western)

\*\* 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: PORTLAND MULTISTATE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
38900 Portland MultiState	1,456	100.00	0.71	0.34	15.28	10.03	55.67	51.72	28.34	37.91	0.32	0.12	0.22	0.28	0.47	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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: PORTLAND MULTISTATE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
38900 Portland MultiState	4	100.00	3.45	0.00	34.92	50.00	43.32	50.00	18.32	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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: PORTLAND MULTISTATE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38900 Portland MultiState	3,363	100.00	4.46	6.33	21.25	19.27	48.44	43.35	25.85	31.04	1.06	1.90	1.09	1.01	1.12

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS      Geography: PORTLAND MULTISTATE      Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38900 Portland MultiState	126	100.00	1.17	0.00	10.08	0.79	64.68	60.32	24.07	38.89	4.45	0.00	2.00	3.44	9.19

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: PORTLAND MULTISTATE					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families <sup>15</sup>	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38900 Portland MultiState	271	100.00	18.33	7.31	19.17	14.23	23.60	18.46	38.90	60.00	0.07	0.09	0.07	0.04	0.09

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 4.1% of loans originated and purchased by bank.

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

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

<sup>15</sup> 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: PORTLAND MULTISTATE						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 16	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38900 Portland MultiState	747	100.00	18.33	10.99	19.17	24.97	23.60	29.58	38.90	34.46	3.14	7.18	3.63	2.80	2.65

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

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

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

16 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: PORTLAND MULTISTATE					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families 17	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
38900 Portland MultiState	1,456	100.00	18.33	4.77	19.17	20.61	23.60	28.78	38.90	45.84	0.37	0.20	0.41	0.36	0.37	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 5.0% of loans originated and purchased by bank.

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

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

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

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PORTLAND MULTISTATE			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
38900 Portland MultiState	3,363	100.00	68.20	53.14	56.62	18.14	25.25	1.06	1.39

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.59% of small loans to businesses originated and purchased by the bank.

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: PORTLAND MULTISTATE			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
38900 Portland MultiState	126	100.00	94.75	73.81	38.10	36.51	25.40	4.45	4.79

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.79% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: PORTLAND MULTISTATE				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
38900 Portland MultiState	44	16,496	76	55,975	120	72,471	100.00	36	20,380

\* '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 AND BRANCH OPENINGS/CLOSINGS Geography: PORTLAND MULTISTATE Evaluation Period: SEPT 1, 2003 TO JUNE 30, 2008																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
38900 Portland MultiState	100.00	40	100.00	12.50	22.50	45.00	20.00	2	0	0	0	+1	+1	1.58	20.92	53.55	23.96

Table 1. Lending Volume

LENDING VOLUME		Geography: ALASKA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
11260 Anchorage AK	61.58	397	47,601	767	230,546	0	0	6	35,886	1,170	314,033	62.01
<b>Limited Review:</b>												
21820 Fairbanks AK	16.11	136	14,736	162	46,259	0	0	8	12,576	306	73,571	14.95
AK Non-MSA Areas	22.31	209	22,842	213	34,197	0	0	2	6,187	424	63,226	23.04
Statewide CD Loans with po benefit to one or more AAs								10	48,699			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: ALASKA					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa II	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						
<b>Full Review:</b>																
11260 Anchorage AK	100	60.24	0.40	1.00	14.34	19.00	56.72	61.00	28.55	19.00	0.10	0.00	0.18	0.12	0.00	
<b>Limited Review:</b>																
21820 Fairbanks AK	29	17.47	0.00	0.00	3.01	6.90	68.32	79.31	28.67	13.79	0.61	0.00	0.72	0.80	0.14	
AK Non-MSA Areas	37	22.29	0.00	0.00	0.23	0.00	74.63	59.46	25.13	40.54	0.51	0.00	0.00	0.30	0.84	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
11260 Anchorage AK	91	50.84	0.40	0.00	14.34	13.19	56.72	59.34	28.55	27.47	4.14	0.00	4.59	4.35	3.57	
<b>Limited Review:</b>																
21820 Fairbanks AK	36	20.11	0.00	0.00	3.01	0.00	68.32	75.00	28.67	25.00	3.34	0.00	0.00	3.77	2.70	
AK Non-MSA Areas	52	29.05	0.00	0.00	0.23	0.00	74.63	69.23	25.13	30.77	6.13	0.00	0.00	5.88	6.76	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
11260 Anchorage AK	204	51.65	0.40	0.00	14.34	11.76	56.72	62.75	28.55	25.49	0.62	0.00	0.74	0.68	0.46
<b>Limited Review:</b>															
21820 Fairbanks AK	71	17.97	0.00	0.00	3.01	4.23	68.32	74.65	28.67	21.13	1.83	0.00	0.00	2.43	0.54
AK Non-MSA Areas	120	30.38	0.00	0.00	0.23	0.00	74.63	69.17	25.13	30.83	2.04	0.00	0.00	1.72	2.79

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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: ALASKA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
11260 Anchorage AK	2	100.00	5.60	0.00	44.61	0.00	43.30	100.00	6.49	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
21820 Fairbanks AK	0	0.00	0.00	0.00	30.65	0.00	58.28	0.00	11.06	0.00	0.00	0.00	0.00	0.00	0.00	
AK Non-MSA Areas	0	0.00	0.00	0.00	0.03	0.00	57.16	0.00	42.81	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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: ALASKA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
<b>Full Review:</b>																
11260 Anchorage AK	767	67.16	1.99	0.26	30.13	28.55	48.58	48.24	19.31	22.95	0.94	0.00	1.18	0.94	0.98	
<b>Limited Review:</b>																
21820 Fairbanks AK	162	14.19	0.00	0.00	11.23	2.47	69.21	84.57	19.56	12.96	1.05	0.00	0.36	1.29	0.78	
AK Non-MSA Areas	213	18.65	0.00	0.00	0.15	0.00	75.82	78.40	24.03	21.60	0.73	0.00	0.00	0.93	0.48	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: ALASKA					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans**	% Families18	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
11260 Anchorage AK	100	60.24	19.69	24.00	17.76	25.00	24.19	17.00	38.36	34.00	0.11	0.95	0.13	0.00	0.08	
<b>Limited Review:</b>																
21820 Fairbanks AK	29	17.47	18.92	0.00	18.79	10.71	22.90	39.29	39.39	50.00	0.63	0.00	0.24	0.69	0.82	
AK Non-MSA Areas	37	22.29	17.15	5.71	15.88	14.29	22.09	31.43	44.88	48.57	0.57	0.00	0.64	0.63	0.54	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

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

18 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 19	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
11260 Anchorage AK	91	50.84	19.69	4.40	17.76	16.48	24.19	32.97	38.36	46.15	4.32	1.72	3.90	5.43	4.03
<b>Limited Review:</b>															
21820 Fairbanks AK	36	20.11	18.92	11.76	18.79	5.88	22.90	52.94	39.39	29.41	3.16	4.17	0.00	8.51	0.00
AK Non-MSA Areas	52	29.05	17.15	5.88	15.88	13.73	22.09	29.41	44.88	50.98	6.40	0.00	6.00	4.82	8.82

\* Based on 2006 Peer Mortgage Data (Western)

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

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

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

19 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families 20	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
11260 Anchorage AK	204	51.65	19.69	8.86	17.76	16.46	24.19	29.11	38.36	45.57	0.56	1.11	0.46	0.51	0.58	
<b>Limited Review:</b>																
21820 Fairbanks AK	71	17.97	18.92	1.82	18.79	32.73	22.90	29.09	39.39	36.36	1.62	0.00	2.03	1.44	1.84	
AK Non-MSA Areas	120	30.38	17.15	7.37	15.88	22.11	22.09	11.58	44.88	58.95	1.94	4.69	2.04	0.44	2.64	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 22.0% of loans originated and purchased by bank.

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

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

20 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
11260 Anchorage AK	767	67.16	56.99	44.72	36.25	22.56	41.20	0.94	0.98
<b>Limited Review:</b>									
21820 Fairbanks AK	162	14.19	49.88	43.21	36.42	26.54	37.04	1.05	1.09
AK Non-MSA Areas	213	18.65	58.51	62.91	61.97	17.84	20.19	0.73	0.88

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.96% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ALASKA				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
11260 Anchorage AK	1	71	10	3,889	11	3,960	49.90	1	1,534
<b>Limited Review:</b>									
21820 Fairbanks AK	0	0	2	5	2	5	.06	0	0
AK Non-MSA Areas	0	0	1	1	1	1	.01	0	0
<b>Statewide Qualified Investments with potential benefit to one or more AAs</b>	1	1,080	1	2,890	2	3,970	50.02	0	0

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\* '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: SEPT 1, 2003 TO JUNE 30, 2008																		
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 Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																		
11260 Anchorage AK	62.01	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
<b>Limited Review:</b>																		
21820 Fairbanks AK	14.95	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	
AK Non-MSA Areas	23.04	7	41.18	0.00	0.00	71.43	28.57	1	2	0	0	-1	0	0.00	0.21	72.13	27.67	

**Table 1. Lending Volume**

LENDING VOLUME		Geography: COLORADO						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
19740 Denver CO	74.84	2,069	187,710	3,184	564,527	0	0	27	95,962	5,280	848,199	85.37
<b>Limited Review:</b>												
14500 Boulder CO	3.63	106	10,830	148	14,855	0	0	2	2,200	256	27,885	2.66
17820 Colorado Springs CO	10.12	401	23,054	312	29,393	0	0	1	237	714	52,684	4.49
22660 Ft Collins CO	5.75	211	14,363	195	15,259	0	0	0	0	406	29,622	5.23
24540 Greeley CO	3.29	153	8,975	74	11,761	5	209	0	0	232	20,945	0.18
CO Non-MSA Areas	2.37	86	4,171	27	3,328	53	3,525	1	504	167	11,528	2.07
Statewide CD Loans with potential benefit to one or more AAs								2	342			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: COLORADO					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
19740 Denver CO	225	75.50	1.94	6.22	22.29	24.00	42.16	39.11	33.62	30.67	0.04	0.00	0.06	0.03	0.03	
<b>Limited Review:</b>																
14500 Boulder CO	10	3.36	0.27	0.00	19.36	30.00	44.99	20.00	35.39	50.00	0.03	0.00	0.00	0.02	0.05	
17820 Colorado Springs CO	27	9.06	0.12	0.00	19.55	18.52	49.48	44.44	30.85	37.04	0.02	0.00	0.02	0.02	0.01	
22660 Ft Collins CO	22	7.38	1.28	0.00	13.61	22.73	62.79	54.55	22.32	22.73	0.06	0.00	0.15	0.04	0.05	
24540 Greeley CO	6	2.01	0.70	0.00	14.59	16.67	53.62	33.33	31.09	50.00	0.01	0.00	0.10	0.00	0.00	
CO Non-MSA Areas	8	2.68	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.18	0.00	0.00	0.18	0.00	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
19740 Denver CO	932	63.70	1.94	2.15	22.29	26.61	42.16	49.03	33.62	22.21	2.37	2.25	3.76	2.94	1.14
<b>Limited Review:</b>															
14500 Boulder CO	50	3.42	0.27	0.00	19.36	24.00	44.99	50.00	35.39	26.00	1.69	0.00	2.08	2.42	0.43
17820 Colorado Springs CO	252	17.22	0.12	0.40	19.55	20.24	49.48	59.92	30.85	19.44	2.87	0.00	4.08	2.91	2.24
22660 Ft Collins CO	94	6.43	1.28	1.06	13.61	18.09	62.79	58.51	22.32	22.34	2.39	50.00	3.77	2.29	1.62
24540 Greeley CO	90	6.15	0.70	0.00	14.59	11.11	53.62	68.89	31.09	20.00	3.48	0.00	3.33	4.15	2.56
CO Non-MSA Areas	45	3.08	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	10.34	0.00	0.00	10.34	0.00

\* Based on 2006 Peer Mortgage Data (Western)

\*\* 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
19740 Denver CO	896	71.91	1.94	1.34	22.29	18.42	42.16	41.29	33.62	38.95	0.25	0.25	0.17	0.24	0.29
<b>Limited Review:</b>															
14500 Boulder CO	44	3.53	0.27	0.00	19.36	13.64	44.99	54.55	35.39	31.82	0.08	0.00	0.00	0.10	0.10
17820 Colorado Springs CO	122	9.79	0.12	0.00	19.55	13.93	49.48	54.92	30.85	31.15	0.13	0.00	0.11	0.18	0.08
22660 Ft Collins CO	94	7.54	1.28	1.06	13.61	15.96	62.79	57.45	22.32	25.53	0.24	0.00	0.22	0.31	0.10
24540 Greeley CO	57	4.57	0.70	0.00	14.59	12.28	53.62	47.37	31.09	40.35	0.10	0.00	0.12	0.10	0.11
CO Non-MSA Areas	33	2.65	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.74	0.00	0.00	0.74	0.00

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
19740 Denver CO	10	83.33	8.56	0.00	40.77	50.00	41.87	30.00	8.80	20.00	0.96	0.00	0.78	0.00	7.69	
<b>Limited Review:</b>																
14500 Boulder CO	1	8.33	5.73	0.00	38.53	100.00	42.03	0.00	13.71	0.00	2.44	0.00	6.67	0.00	0.00	
17820 Colorado Springs CO	0	0.00	0.76	0.00	43.58	0.00	44.09	0.00	11.57	0.00	0.00	0.00	0.00	0.00	0.00	
22660 Ft Collins CO	1	8.33	3.99	0.00	39.68	0.00	46.38	100.00	9.95	0.00	4.17	0.00	0.00	5.26	0.00	
24540 Greeley CO	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	
CO Non-MSA Areas	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
<b>Full Review:</b>																
19740 Denver CO	3,140	80.62	3.84	3.98	23.68	30.22	36.92	29.27	34.63	36.53	0.70	1.13	1.06	0.59	0.59	
<b>Limited Review:</b>																
14500 Boulder CO	147	3.77	1.21	0.00	31.21	38.78	38.74	43.54	28.82	17.69	0.18	0.00	0.32	0.14	0.14	
17820 Colorado Springs CO	312	8.01	5.17	4.49	24.24	33.97	41.05	41.35	29.53	20.19	0.30	0.40	0.68	0.26	0.13	
22660 Ft Collins CO	195	5.01	1.14	1.03	24.50	35.90	51.15	44.10	23.21	18.97	0.31	0.00	0.61	0.28	0.14	
24540 Greeley CO	74	1.90	5.51	1.35	12.29	1.35	49.76	55.41	32.33	41.89	0.22	0.00	0.00	0.28	0.24	
CO Non-MSA Areas	27	0.69	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.58	0.00	0.00	0.62	0.00	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: COLORADO					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
<b>Full Review:</b>																
19740 Denver CO	0	0.00	1.79	0.00	20.46	0.00	38.58	0.00	38.61	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
14500 Boulder CO	0	0.00	0.29	0.00	21.82	0.00	49.19	0.00	28.55	0.00	0.00	0.00	0.00	0.00	0.00	
17820 Colorado Springs CO	0	0.00	2.89	0.00	16.19	0.00	52.37	0.00	28.56	0.00	0.00	0.00	0.00	0.00	0.00	
22660 Ft Collins CO	0	0.00	1.16	0.00	15.37	0.00	55.68	0.00	27.79	0.00	0.00	0.00	0.00	0.00	0.00	
24540 Greeley CO	5	8.62	1.92	0.00	6.66	0.00	66.24	100.00	25.18	0.00	0.39	0.00	0.00	0.56	0.00	
CO Non-MSA Areas	53	91.38	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.86	0.00	0.00	1.87	0.00	

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\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: COLORADO						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families <sup>21</sup>	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
19740 Denver CO	227	75.67	18.26	18.10	18.82	29.41	23.74	13.57	39.18	38.91	0.04	0.20	0.04	0.03	0.04
<b>Limited Review:</b>															
14500 Boulder CO	10	3.33	19.44	0.00	18.52	0.00	22.39	10.00	39.66	90.00	0.03	0.00	0.00	0.00	0.07
17820 Colorado Springs CO	27	9.00	17.17	12.00	18.97	28.00	24.84	12.00	39.03	48.00	0.02	0.00	0.05	0.00	0.02
22660 Ft Collins CO	22	7.33	16.76	9.52	19.36	33.33	25.32	23.81	38.56	33.33	0.06	0.18	0.13	0.07	0.02
24540 Greeley CO	6	2.00	19.33	0.00	17.93	50.00	24.16	0.00	38.59	50.00	0.01	0.00	0.06	0.00	0.00
CO Non-MSA Areas	8	2.67	21.35	25.00	23.33	50.00	23.94	0.00	31.38	25.00	0.22	0.00	0.83	0.00	0.00

\* Based on 2006 Peer Mortgage Data (Western)

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

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

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

21 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 22	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
19740 Denver CO	932	63.66	18.26	8.08	18.82	24.25	23.74	31.47	39.18	36.21	2.45	2.81	3.46	2.33	1.97
<b>Limited Review:</b>															
14500 Boulder CO	51	3.48	19.44	6.00	18.52	16.00	22.39	32.00	39.66	46.00	1.75	1.79	2.27	2.45	1.20
17820 Colorado Springs CO	252	17.21	17.17	7.14	18.97	20.63	24.84	29.37	39.03	42.86	3.05	3.47	4.04	3.03	2.66
22660 Ft Collins CO	94	6.42	16.76	8.60	19.36	21.51	25.32	37.63	38.56	32.26	2.49	2.70	3.51	2.46	1.97
24540 Greeley CO	90	6.15	19.33	4.44	17.93	18.89	24.16	25.56	38.59	51.11	3.71	3.03	6.19	2.83	3.51
CO Non-MSA Areas	45	3.07	21.35	6.82	23.33	38.64	23.94	31.82	31.38	22.73	9.82	0.00	22.22	5.88	7.14

\* Based on 2006 Peer Mortgage Data (Western)

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

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

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

22 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families 23	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
19740 Denver CO	899	71.98	18.26	8.42	18.82	19.61	23.74	26.41	39.18	45.56	0.31	0.43	0.29	0.24	0.37	
<b>Limited Review:</b>																
14500 Boulder CO	44	3.52	19.44	12.20	18.52	26.83	22.39	17.07	39.66	43.90	0.09	0.00	0.07	0.11	0.09	
17820 Colorado Springs CO	122	9.77	17.17	4.96	18.97	20.66	24.84	32.23	39.03	42.15	0.18	0.36	0.21	0.12	0.18	
22660 Ft Collins CO	94	7.53	16.76	3.33	19.36	18.89	25.32	26.67	38.56	51.11	0.29	0.26	0.25	0.42	0.23	
24540 Greeley CO	57	4.56	19.33	5.26	17.93	24.56	24.16	17.54	38.59	52.63	0.13	0.00	0.20	0.05	0.17	
CO Non-MSA Areas	33	2.64	21.35	18.75	23.33	21.88	23.94	18.75	31.38	40.63	0.79	4.08	0.68	0.39	0.66	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchased by bank.

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

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

23 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
19740 Denver CO	3,184	80.81	65.39	62.06	60.62	16.27	23.12	0.70	1.12
<b>Limited Review:</b>									
14500 Boulder CO	148	3.76	67.15	70.27	78.38	10.14	11.49	0.18	0.43
17820 Colorado Springs CO	312	7.92	67.00	67.95	78.53	10.58	10.90	0.30	0.52
22660 Ft Collins CO	195	4.95	67.77	76.41	84.62	7.69	7.69	0.31	0.47
24540 Greeley CO	74	1.88	63.87	66.22	67.57	9.46	22.97	0.22	0.33
CO Non-MSA Areas	27	0.69	57.94	74.07	81.48	0.00	18.52	0.58	1.01

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.89% 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
19740 Denver CO	0	0.00	94.03	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
14500 Boulder CO	0	0.00	95.31	0.00	0.00	0.00	0.00	0.00	0.00
17820 Colorado Springs CO	0	0.00	95.67	0.00	0.00	0.00	0.00	0.00	0.00
22660 Ft Collins CO	0	0.00	96.84	0.00	0.00	0.00	0.00	0.00	0.00
24540 Greeley CO	5	8.62	92.62	100.00	100.00	0.00	0.00	0.39	0.51
CO Non-MSA Areas	53	91.38	94.27	100.00	79.25	20.75	0.00	1.86	2.09

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: COLORADO				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
19740 Denver CO	39	4,241	42	11,839	81	16,080	83.49	26	11,159
<b>Limited Review:</b>									
14500 Boulder CO	13	1,028	1	5	14	1,033	5.36	9	90
17820 Colorado Springs CO	3	1,281	4	13	7	1,294	6.72	0	0
22660 Ft Collins CO	5	800	2	2	7	802	4.16	3	33
24540 Greeley CO	4	50	0	0	4	50	.26	2	13
CO Non-MSA Areas	0	0	0	0	0	0	0.00	0	0

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\* '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: SEPT 1, 2003 TO JUNE 30, 2008																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
19740 Denver CO	85.37	36	70.59	2.78	19.44	36.11	41.67	9	5	0	0	0	+4	4.67	28.17	39.55	27.49
<b>Limited Review:</b>																	
14500 Boulder CO	2.66	2	3.92	0.00	0.00	100.00	0.00	1	0	0	0	+1	0	3.35	25.38	41.56	29.70
17820 Colorado Springs CO	4.49	5	9.80	0.00	40.00	40.00	20.00	0	2	0	0	-1	-1	0.34	26.24	47.96	25.46
22660 Ft Collins CO	5.23	5	9.80	0.00	40.00	40.00	20.00	0	0	0	0	0	0	3.28	19.05	59.01	18.66
24540 Greeley CO	0.18	1	1.96	100.00	0.00	0.00	0.00	0	0	0	0	0	0	2.21	21.67	49.61	25.28
CO Non-MSA Areas	2.07	2	3.92	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: FLORIDA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
15980 Cape Coral FL	48.34	396	36,823	41	9,884	0	0	0	0	437	46,707	33.90
<b>Limited Review:</b>												
34940 Naples FL	19.91	138	32,669	42	9,224	0	0	0	0	180	41,893	53.27
48424 West Palm Beach F	31.75	256	43,459	31	8,049	0	0	0	0	287	51,508	12.83
Statewide CD Loans with p benefit to one or more AAs								8	5,423			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
15980 Cape Coral FL	44	42.72	0.87	0.00	13.24	4.55	63.06	31.82	22.84	63.64	0.01	0.00	0.00	0.01	0.03	
<b>Limited Review:</b>																
34940 Naples FL	39	37.86	2.30	0.00	13.08	7.69	47.98	12.82	36.65	79.49	0.02	0.00	0.00	0.00	0.07	
48424 West Palm Beach FL	20	19.42	1.53	0.00	24.63	0.00	36.35	15.00	37.50	85.00	0.01	0.00	0.00	0.00	0.02	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
15980 Cape Coral FL	278	60.04	0.87	0.36	13.24	6.12	63.06	77.34	22.84	16.19	2.00	6.67	1.21	2.20	1.43	
<b>Limited Review:</b>																
34940 Naples FL	51	11.02	2.30	0.00	13.08	15.69	47.98	74.51	36.65	9.80	0.57	0.00	1.20	0.50	0.36	
48424 West Palm Beach FL	134	28.94	1.53	1.49	24.63	13.43	36.35	42.54	37.50	42.54	0.60	0.00	0.25	0.71	0.78	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
15980 Cape Coral FL	74	33.04	0.87	0.00	13.24	5.41	63.06	60.81	22.84	33.78	0.06	0.00	0.03	0.06	0.06
<b>Limited Review:</b>															
34940 Naples FL	48	21.43	2.30	2.08	13.08	6.25	47.98	41.67	36.65	50.00	0.11	0.79	0.09	0.08	0.14
48424 West Palm Beach FL	102	45.54	1.53	0.98	24.63	23.53	36.35	37.25	37.50	38.24	0.05	0.00	0.06	0.06	0.05

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
15980 Cape Coral FL	41	35.96	0.97	0.00	13.96	26.83	59.39	19.51	25.68	53.66	0.04	0.00	0.05	0.02	0.08
<b>Limited Review:</b>															
34940 Naples FL	42	36.84	1.72	0.00	10.96	2.38	44.76	14.29	42.56	83.33	0.07	0.00	0.00	0.01	0.16
48424 West Palm Beach FL	31	27.19	3.43	12.90	21.26	25.81	34.69	12.90	40.46	48.39	0.02	0.08	0.02	0.00	0.02

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families <sub>24</sub>	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
15980 Cape Coral FL	44	42.72	17.16	0.00	19.96	4.65	23.32	4.65	39.56	90.70	0.02	0.00	0.00	0.02	0.02
<b>Limited Review:</b>															
34940 Naples FL	39	37.86	19.06	0.00	19.32	5.13	20.65	5.13	40.97	89.74	0.02	0.00	0.24	0.00	0.02
48424 West Palm Beach FL	20	19.42	19.86	0.00	18.56	0.00	20.60	17.65	40.98	82.35	0.00	0.00	0.00	0.00	0.00

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchased by bank.

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

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

24 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, 2004 TO DECEMBER 31, 2007									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 25	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
15980 Cape Coral FL	278	60.04	17.16	1.48	19.96	7.04	23.32	26.30	39.56	65.19	2.11	1.43	0.00	2.16	2.68
<b>Limited Review:</b>															
34940 Naples FL	51	11.02	19.06	0.00	19.32	4.00	20.65	42.00	40.97	54.00	0.60	0.00	0.00	0.77	0.71
48424 West Palm Beach FL	134	28.94	19.86	5.43	18.56	8.53	20.60	31.01	40.98	55.04	0.63	1.08	0.37	0.35	0.82

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

25 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families 26	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
15980 Cape Coral FL	74	33.04	17.16	4.05	19.96	9.46	23.32	32.43	39.56	54.05	0.08	0.14	0.10	0.13	0.05	
<b>Limited Review:</b>																
34940 Naples FL	48	21.43	19.06	2.17	19.32	15.22	20.65	15.22	40.97	67.39	0.13	0.32	0.22	0.11	0.11	
48424 West Palm Beach FL	102	45.54	19.86	1.96	18.56	20.59	20.60	32.35	40.98	45.10	0.07	0.05	0.14	0.08	0.04	

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

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

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

26 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
15980 Cape Coral FL	41	35.96	66.74	43.90	36.59	36.59	26.83	0.04	0.05
<b>Limited Review:</b>									
34940 Naples FL	42	36.84	66.67	69.05	47.62	21.43	30.95	0.07	0.14
48424 West Palm Beach FL	31	27.19	67.23	74.19	38.71	19.35	41.94	0.02	0.04

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.75% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
15980 Cape Coral FL	1	2	0	0	1	2	23.33	1	141
<b>Limited Review:</b>									
34940 Naples FL	1	5	1	2	2	7	76.67	1	43
48424 West Palm Beach FL	0	0	0	0	0	0	0.00	0	0

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\* '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: SEPT 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population								
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
<b>Full Review:</b>																						
15980 Cape Coral FL	33.90	2	50.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.95	17.89	61.13	19.03					
<b>Limited Review:</b>																						
34940 Naples FL	53.27	1	25.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.48	18.77	45.24	28.51					
48424 West Palm Beach FL	12.83	1	25.00	0.00	0.00	0.00	100.00	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, 2004 TO DECEMBER 31, 2007						
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
14260 Boise ID	57.10	1,245	143,833	1,357	244,978	56	5,313	8	29,328	2,666	423,452	60.60
<b>Limited Review:</b>												
26820 Idaho Falls ID	11.03	298	26,073	186	39,142	31	5,769	0	0	515	70,984	8.36
38540 Pocatello ID	7.80	169	9,349	131	27,870	62	8,659	2	3,400	364	49,278	9.41
ID Non-MSA Areas	24.07	480	33,306	291	43,795	353	55,976	0	0	1,124	133,077	21.63
Statewide CD Loans with p benefit to one or more AAs								3	5,247			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: IDAHO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
14260 Boise ID	292	68.71	0.80	0.00	15.47	15.75	49.07	45.55	34.66	38.70	0.18	0.00	0.26	0.14	0.21	
<b>Limited Review:</b>																
26820 Idaho Falls ID	43	10.12	0.00	0.00	10.92	11.63	67.32	65.12	21.76	23.26	0.16	0.00	0.18	0.20	0.00	
38540 Pocatello ID	37	8.71	0.00	0.00	18.36	72.97	52.28	21.62	29.37	5.41	0.21	0.00	0.80	0.00	0.10	
ID Non-MSA Areas	53	12.47	0.00	0.00	7.90	7.55	83.31	83.02	8.79	9.43	0.24	0.00	0.00	0.28	0.18	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
14260 Boise ID	291	47.78	0.80	2.06	15.47	14.78	49.07	52.23	34.66	30.93	3.12	6.25	2.48	3.41	2.90
<b>Limited Review:</b>															
26820 Idaho Falls ID	84	13.79	0.00	0.00	10.92	14.29	67.32	70.24	21.76	15.48	4.68	0.00	3.03	5.76	2.60
38540 Pocatello ID	59	9.69	0.00	0.00	18.36	18.64	52.28	64.41	29.37	16.95	8.11	0.00	8.33	10.75	4.41
ID Non-MSA Areas	175	28.74	0.00	0.00	7.90	4.57	83.31	86.86	8.79	8.57	5.15	0.00	8.51	4.80	5.97

\* Based on 2006 Peer Mortgage Data (Western)

\*\* 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
14260 Boise ID	661	57.13	0.80	0.91	15.47	9.68	49.07	49.17	34.66	40.24	0.57	0.86	0.25	0.64	0.59
<b>Limited Review:</b>															
26820 Idaho Falls ID	171	14.78	0.00	0.00	10.92	4.09	67.32	71.93	21.76	23.98	1.51	0.00	1.00	1.53	1.66
38540 Pocatello ID	73	6.31	0.00	0.00	18.36	23.29	52.28	38.36	29.37	38.36	0.91	0.00	1.08	0.80	0.98
ID Non-MSA Areas	252	21.78	0.00	0.00	7.90	5.56	83.31	90.87	8.79	3.57	1.47	0.00	0.61	1.66	0.23

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
14260 Boise ID	1	100.00	1.80	0.00	38.41	0.00	32.85	100.00	26.94	0.00	3.85	0.00	0.00	11.11	0.00	
<b>Limited Review:</b>																
26820 Idaho Falls ID	0	0.00	0.00	0.00	36.24	0.00	53.48	0.00	10.29	0.00	0.00	0.00	0.00	0.00	0.00	
38540 Pocatello ID	0	0.00	0.00	0.00	48.34	0.00	43.72	0.00	7.95	0.00	0.00	0.00	0.00	0.00	0.00	
ID Non-MSA Areas	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 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
<b>Full Review:</b>																
14260 Boise ID	1,357	69.06	0.99	1.33	24.05	26.16	42.52	39.50	32.43	33.01	1.35	1.45	1.66	1.44	1.15	
<b>Limited Review:</b>																
26820 Idaho Falls ID	186	9.47	0.00	0.00	20.14	24.73	57.29	46.24	22.56	29.03	1.22	0.00	2.15	0.70	2.02	
38540 Pocatello ID	131	6.67	0.00	0.00	33.61	32.06	45.54	50.38	20.85	17.56	1.58	0.00	1.64	1.93	1.35	
ID Non-MSA Areas	291	14.81	0.00	0.00	12.63	7.90	78.84	84.88	8.54	7.22	0.73	0.00	0.66	0.78	0.78	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: IDAHO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
<b>Full Review:</b>																
14260 Boise ID	56	11.16	0.63	0.00	15.24	23.21	61.80	71.43	22.33	5.36	1.61	0.00	3.41	1.53	0.00	
<b>Limited Review:</b>																
26820 Idaho Falls ID	31	6.18	0.00	0.00	3.95	0.00	81.15	100.00	14.90	0.00	3.35	0.00	0.00	3.82	0.00	
38540 Pocatello ID	62	12.35	0.00	0.00	8.67	9.68	75.61	66.13	15.72	24.19	20.18	0.00	57.14	14.08	30.00	
ID Non-MSA Areas	353	70.32	0.00	0.00	4.29	1.70	90.29	96.60	5.42	1.70	7.34	0.00	0.00	8.27	0.00	

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\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: IDAHO					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans**	% Families <sup>27</sup>	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
14260 Boise ID	292	68.71	17.47	22.49	18.97	29.07	23.73	13.49	39.83	34.95	0.22	0.86	0.44	0.16	0.16	
<b>Limited Review:</b>																
26820 Idaho Falls ID	43	10.12	18.07	11.90	18.91	16.67	23.84	23.81	39.18	47.62	0.18	0.33	0.00	0.25	0.20	
38540 Pocatello ID	37	8.71	19.76	47.22	18.53	38.89	22.10	2.78	39.62	11.11	0.24	0.00	0.99	0.00	0.08	
ID Non-MSA Areas	53	12.47	17.97	0.00	18.80	11.76	24.78	41.18	38.45	47.06	0.28	0.00	0.21	0.35	0.28	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

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

<sup>27</sup> 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families 28	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
14260 Boise ID	291	47.78	17.47	9.72	18.97	19.10	23.73	30.90	39.83	40.28	3.20	6.40	2.87	3.59	2.70	
<b>Limited Review:</b>																
26820 Idaho Falls ID	84	13.79	18.07	10.71	18.91	29.76	23.84	26.19	39.18	33.33	4.79	4.55	11.11	5.76	2.50	
38540 Pocatello ID	59	9.69	19.76	15.25	18.53	27.12	22.10	33.90	39.62	23.73	8.57	33.33	5.26	12.90	4.55	
ID Non-MSA Areas	175	28.74	17.97	7.02	18.80	20.47	24.78	31.58	38.45	40.94	5.39	12.90	8.25	6.47	3.36	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

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

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

28 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, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans****	% Families 29	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
14260 Boise ID	661	57.13	17.47	5.96	18.97	16.06	23.73	30.63	39.83	47.35	0.64	0.37	0.50	0.78	0.64	
<b>Limited Review:</b>																
26820 Idaho Falls ID	171	14.78	18.07	5.52	18.91	17.18	23.84	29.45	39.18	47.85	1.67	0.57	1.74	1.33	2.00	
38540 Pocatello ID	73	6.31	19.76	5.88	18.53	25.00	22.10	23.53	39.62	45.59	1.07	2.04	2.24	0.93	0.61	
ID Non-MSA Areas	252	21.78	17.97	2.47	18.80	16.05	24.78	29.22	38.45	52.26	1.70	1.47	1.74	1.76	1.68	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 6.8% of loans originated and purchased by bank.

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

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

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

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: IDAHO			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
14260 Boise ID	1,357	69.06	64.82	63.74	58.29	19.38	22.33	1.35	1.91
<b>Limited Review:</b>									
26820 Idaho Falls ID	186	9.47	61.48	65.59	52.15	19.35	28.49	1.22	1.75
38540 Pocatello ID	131	6.67	60.11	54.96	43.51	24.43	32.06	1.58	2.16
ID Non-MSA Areas	291	14.81	59.71	58.76	65.98	14.09	19.93	0.73	0.93

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.31% of small loans to businesses originated and purchased by the bank.

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: IDAHO			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
14260 Boise ID	56	11.16	95.29	96.43	73.21	19.64	7.14	1.61	2.16
<b>Limited Review:</b>									
26820 Idaho Falls ID	31	6.18	93.36	54.84	32.26	41.94	25.81	3.35	2.16
38540 Pocatello ID	62	12.35	94.85	64.52	54.84	19.35	25.81	20.18	17.58
ID Non-MSA Areas	353	70.32	94.49	67.99	46.18	30.03	23.80	7.34	5.91

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: IDAHO									
Evaluation Period: SEPTEMBER 1, 2003 to JUNE 30, 2008									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
14260 Boise ID	3	14	31	132	34	146	10.91	2	34
<b>Limited Review:</b>									
26820 Idaho Falls ID	0	0	1	3	1	3	.22	0	0
38540 Pocatello ID	0	0	8	38	8	38	2.83	0	0
ID Non-MSA Areas	1	723	1	57	2	779	58.09	1	4
<b>Statewide Qualified Investments with potential benefit to one or more AAs</b>	0	0	1	375	1	375	27.94	1	147

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\* '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: SEPT1, 2003 to JUNE 30, 2008																		
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																		
14260 Boise ID	60.60	14	45.16	0.00	28.57	35.71	35.71	1	0	0	0	0	0	+1	1.57	19.46	47.53	31.44
<b>Limited Review:</b>																		
26820 Idaho Falls ID	8.36	3	9.68	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0	0.00	13.54	66.55	19.91
38540 Pocatello ID	9.41	4	12.90	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0	0.00	21.77	51.13	27.10
ID Non-MSA Areas	21.63	10	32.26	0.00	20.00	80.00	0.00	0	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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
26900 Indianapolis IN	51.15	1,583	99,611	1,319	212,201	32	4,720	9	65,443	2,943	381,975	40.67
<b>Limited Review:</b>												
11300 Anderson IN	5.11	216	11,632	75	11,610	1	25	2	3,000	294	26,267	6.04
14020 Bloomington IN	0.83	28	3,989	20	2,463	0	0	0	0	48	6,452	0.42
21140 Elkhart IN	16.41	568	37,413	374	79,414	2	60	0	0	944	116,887	14.91
29020 Kokomo IN	5.26	219	13,314	79	6,368	5	642	0	0	303	20,324	7.77
43780 South Bend IN	12.55	487	29,143	230	48,460	4	200	1	500	722	78,303	21.25
IN Non-MSA Areas	8.69	369	23,803	128	21,993	3	52	0	0	500	45,848	8.94
Statewide CD Loans with potential benefit to one or more AAs								9	20,262			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: INDIANA					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
26900 Indianapolis IN	230	34.28	3.35	5.22	20.37	13.04	45.21	54.35	31.07	27.39	0.13	0.27	0.05	0.18	0.09	
<b>Limited Review:</b>																
11300 Anderson IN	31	4.62	2.46	3.23	13.30	22.58	52.79	45.16	31.45	29.03	0.26	3.23	0.35	0.14	0.32	
14020 Bloomington IN	11	1.64	0.77	0.00	8.38	18.18	54.51	27.27	36.34	54.55	0.09	0.00	0.30	0.12	0.00	
21140 Elkhart IN	145	21.61	0.06	0.00	2.92	1.38	90.58	86.21	6.44	12.41	0.69	0.00	0.00	0.78	0.00	
29020 Kokomo IN	32	4.77	0.00	0.00	26.56	25.00	52.14	50.00	21.29	25.00	0.21	0.00	0.00	0.40	0.00	
43780 South Bend IN	122	18.18	1.29	0.00	19.73	21.31	51.29	41.80	27.68	36.89	0.50	0.00	0.44	0.44	0.68	
IN Non-MSA Areas	100	14.90	0.00	0.00	3.89	8.00	86.38	91.00	9.73	1.00	0.43	0.00	2.26	0.42	0.00	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: INDIANA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
26900 Indianapolis IN	791	54.70	3.35	1.77	20.37	13.91	45.21	53.48	31.07	30.85	3.84	3.40	3.48	4.05	3.76	
<b>Limited Review:</b>																
11300 Anderson IN	77	5.33	2.46	5.19	13.30	14.29	52.79	49.35	31.45	31.17	5.04	33.33	4.00	3.86	5.97	
14020 Bloomington IN	9	0.62	0.77	0.00	8.38	0.00	54.51	88.89	36.34	11.11	0.30	0.00	0.00	0.51	0.00	
21140 Elkhart IN	198	13.69	0.06	0.00	2.92	1.01	90.58	92.93	6.44	6.06	6.77	0.00	0.00	7.29	3.92	
29020 Kokomo IN	63	4.36	0.00	0.00	26.56	25.40	52.14	63.49	21.29	11.11	3.92	0.00	1.56	6.45	1.49	
43780 South Bend IN	170	11.76	1.29	2.94	19.73	24.12	51.29	54.71	27.68	18.24	4.72	15.38	4.79	5.16	3.28	
IN Non-MSA Areas	138	9.54	0.00	0.00	3.89	7.25	86.38	86.23	9.73	6.52	5.34	0.00	26.92	4.54	3.57	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
26900 Indianapolis IN	561	41.56	3.35	1.78	20.37	9.80	45.21	54.90	31.07	33.51	0.46	0.09	0.32	0.65	0.34	
<b>Limited Review:</b>																
11300 Anderson IN	108	8.00	2.46	2.78	13.30	5.56	52.79	56.48	31.45	35.19	1.27	4.55	0.72	1.47	1.08	
14020 Bloomington IN	8	0.59	0.77	0.00	8.38	0.00	54.51	37.50	36.34	62.50	0.17	0.00	0.00	0.07	0.37	
21140 Elkhart IN	225	16.67	0.06	0.00	2.92	2.67	90.58	88.00	6.44	9.33	1.06	0.00	0.86	1.06	1.17	
29020 Kokomo IN	124	9.19	0.00	0.00	26.56	23.39	52.14	54.84	21.29	21.77	1.80	0.00	1.50	2.11	1.50	
43780 South Bend IN	194	14.37	1.29	1.03	19.73	20.10	51.29	55.15	27.68	23.71	0.84	1.25	1.06	0.89	0.59	
IN Non-MSA Areas	130	9.63	0.00	0.00	3.89	9.23	86.38	81.54	9.73	9.23	1.04	0.00	2.56	0.99	0.88	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: INDIANA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
26900 Indianapolis IN	1	33.33	7.03	0.00	33.00	0.00	45.72	0.00	14.25	100.00	0.88	0.00	0.00	0.00	7.14	
<b>Limited Review:</b>																
11300 Anderson IN	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	
14020 Bloomington IN	0	0.00	25.20	0.00	18.67	0.00	33.44	0.00	22.69	0.00	0.00	0.00	0.00	0.00	0.00	
21140 Elkhart IN	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	
29020 Kokomo IN	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	
43780 South Bend IN	1	33.33	2.28	0.00	30.66	0.00	42.25	100.00	24.82	0.00	10.00	0.00	0.00	14.29	0.00	
IN Non-MSA Areas	1	33.33	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 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: INDIANA					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
26900 Indianapolis IN	1,319	59.28	4.32	2.73	19.00	14.10	44.89	45.34	31.66	37.83	0.70	0.67	0.80	0.77	0.61						
<b>Limited Review:</b>																					
11300 Anderson IN	75	3.37	2.34	2.67	18.39	16.00	54.44	58.67	24.83	22.67	0.94	0.00	1.26	1.11	0.63						
14020 Bloomington IN	20	0.90	16.25	10.00	13.47	15.00	44.40	5.00	25.89	70.00	0.16	0.00	0.23	0.00	0.47						
21140 Elkhart IN	374	16.81	4.06	5.35	5.32	6.68	86.10	81.55	4.51	6.42	1.57	2.43	3.47	1.42	3.14						
29020 Kokomo IN	79	3.55	0.00	0.00	40.01	32.91	45.16	50.63	14.82	16.46	1.26	0.00	1.14	1.33	1.42						
43780 South Bend IN	230	10.34	2.04	1.30	28.59	30.87	46.38	47.39	22.99	20.43	0.79	0.00	0.98	0.95	0.46						
IN Non-MSA Areas	128	5.75	0.00	0.00	3.94	1.56	88.21	94.53	7.86	3.91	0.58	0.00	0.00	0.66	0.21						

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: INDIANA					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
<b>Full Review:</b>																
26900 Indianapolis IN	32	68.09	1.68	0.00	9.98	0.00	62.39	90.63	25.95	9.38	3.29	0.00	0.00	3.38	3.57	
<b>Limited Review:</b>																
11300 Anderson IN	1	2.13	0.22	0.00	4.16	0.00	51.42	0.00	44.20	100.00	0.00	0.00	0.00	0.00	0.00	
14020 Bloomington IN	0	0.00	2.48	0.00	5.94	0.00	58.42	0.00	33.17	0.00	0.00	0.00	0.00	0.00	0.00	
21140 Elkhart IN	2	4.26	0.72	0.00	0.72	0.00	96.38	100.00	2.17	0.00	0.00	0.00	0.00	0.00	0.00	
29020 Kokomo IN	5	10.64	0.00	0.00	7.81	0.00	50.56	60.00	41.64	40.00	2.44	0.00	0.00	10.00	0.00	
43780 South Bend IN	4	8.51	0.21	0.00	8.32	0.00	71.73	100.00	19.75	0.00	1.10	0.00	0.00	1.21	0.00	
IN Non-MSA Areas	3	6.38	0.00	0.00	4.65	66.67	88.07	33.33	7.28	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: INDIANA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families30	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
26900 Indianapolis IN	230	34.28	19.97	25.11	18.73	25.99	22.75	24.23	38.55	24.67	0.15	0.30	0.14	0.17	0.10
<b>Limited Review:</b>															
11300 Anderson IN	31	4.62	18.05	16.13	19.37	25.81	23.21	25.81	39.38	32.26	0.32	0.36	0.29	0.35	0.31
14020 Bloomington IN	11	1.64	17.40	10.00	16.89	10.00	21.13	30.00	44.58	50.00	0.12	0.00	0.00	0.46	0.00
21140 Elkhart IN	145	21.61	16.23	19.29	19.39	29.29	27.07	24.29	37.31	27.14	0.78	1.37	0.88	0.27	0.88
29020 Kokomo IN	32	4.77	19.85	18.75	18.86	28.13	22.99	25.00	38.29	28.13	0.25	0.27	0.25	0.21	0.28
43780 South Bend IN	122	18.18	18.53	19.17	18.63	31.67	23.48	18.33	39.36	30.83	0.60	0.23	0.59	0.67	0.70
IN Non-MSA Areas	100	14.90	14.26	20.00	18.34	25.00	26.64	26.00	40.76	29.00	0.51	2.04	0.49	0.10	0.42

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

30 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 31	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
26900 Indianapolis IN	791	54.70	19.97	9.63	18.73	23.32	22.75	24.84	38.55	42.21	3.97	2.62	4.37	3.79	4.29
<b>Limited Review:</b>															
11300 Anderson IN	77	5.33	18.05	16.22	19.37	18.92	23.21	25.68	39.38	39.19	5.19	5.77	5.43	1.85	7.52
14020 Bloomington IN	9	0.62	17.40	0.00	16.89	11.11	21.13	11.11	44.58	77.78	0.30	0.00	0.00	0.00	0.65
21140 Elkhart IN	198	13.69	16.23	13.71	19.39	18.78	27.07	35.53	37.31	31.98	6.98	7.02	4.52	8.50	7.34
29020 Kokomo IN	63	4.36	19.85	17.46	18.86	28.57	22.99	15.87	38.29	38.10	4.17	4.00	8.00	1.39	4.41
43780 South Bend IN	170	11.76	18.53	13.77	18.63	29.34	23.48	28.14	39.36	28.74	4.62	4.14	4.90	4.29	4.92
IN Non-MSA Areas	138	9.54	14.26	13.87	18.34	25.55	26.64	24.09	40.76	36.50	5.46	4.08	6.16	6.50	4.47

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

31 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 32	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
26900 Indianapolis IN	561	41.56	19.97	12.25	18.73	24.68	22.75	25.41	38.55	37.66	0.58	0.92	0.76	0.47	0.45
<b>Limited Review:</b>															
11300 Anderson IN	108	8.00	18.05	18.69	19.37	31.78	23.21	24.30	39.38	25.23	1.60	4.00	1.45	1.60	0.93
14020 Bloomington IN	8	0.59	17.40	12.50	16.89	12.50	21.13	37.50	44.58	37.50	0.21	0.00	0.27	0.19	0.24
21140 Elkhart IN	225	16.67	16.23	13.36	19.39	32.26	27.07	25.81	37.31	28.57	1.22	1.97	1.33	0.97	1.14
29020 Kokomo IN	124	9.19	19.85	10.00	18.86	24.17	22.99	29.17	38.29	36.67	2.14	1.42	3.27	1.79	1.98
43780 South Bend IN	194	14.37	18.53	15.47	18.63	32.04	23.48	22.10	39.36	30.39	0.99	1.52	1.37	0.65	0.76
IN Non-MSA Areas	130	9.63	14.26	14.40	18.34	26.40	26.64	27.20	40.76	32.00	1.19	2.71	1.20	1.13	0.89

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchased by bank.

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

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

32 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
26900 Indianapolis IN	1,319	59.28	64.44	56.18	61.79	18.73	19.48	0.70	1.26
<b>Limited Review:</b>									
11300 Anderson IN	75	3.37	66.77	72.00	68.00	17.33	14.67	0.94	1.88
14020 Bloomington IN	20	0.90	66.95	85.00	75.00	0.00	25.00	0.16	0.49
21140 Elkhart IN	374	16.81	61.71	46.52	50.53	22.99	26.47	1.57	2.58
29020 Kokomo IN	79	3.55	64.77	81.01	78.48	12.66	8.86	1.26	2.17
43780 South Bend IN	230	10.34	64.41	54.35	55.65	15.65	28.70	0.79	1.27
IN Non-MSA Areas	128	5.75	64.73	56.25	66.41	11.72	21.88	0.58	0.87

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.67% 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: INDIANA			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
26900 Indianapolis IN	32	68.09	96.76	68.75	46.88	40.63	12.50	3.29	3.40
<b>Limited Review:</b>									
11300 Anderson IN	1	2.13	98.69	100.00	100.00	0.00	0.00	0.00	0.00
14020 Bloomington IN	0	0.00	96.04	0.00	0.00	0.00	0.00	0.00	0.00
21140 Elkhart IN	2	4.26	98.55	100.00	100.00	0.00	0.00	0.00	0.00
29020 Kokomo IN	5	10.64	98.88	100.00	40.00	60.00	0.00	2.44	2.78
43780 South Bend IN	4	8.51	96.88	100.00	100.00	0.00	0.00	1.10	1.21
IN Non-MSA Areas	3	6.38	97.67	100.00	100.00	0.00	0.00	0.00	0.00

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: INDIANA				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
26900 Indianapolis IN	39	2,481	21	3,281	60	5,763	60.83	22	1,156	
<b>Limited Review:</b>										
11300 Anderson IN	2	31	10	515	12	546	5.76	7	88	
14020 Bloomington IN	1	112	0	0	1	112	1.18	0	0	
21140 Elkhart IN	3	81	5	1,591	8	1,672	17.65	2	719	
29020 Kokomo IN	0	0	2	169	2	169	1.79	2	5	
43780 South Bend IN	0	0	15	248	15	248	2.62	3	36	
IN Non-MSA Areas	1	142	0	0	1	142	1.50	1	2	
<b>Statewide Qualified Investments with potential benefit to one or more AAs</b>	15	821	0	0	15	821	8.67	4	6	

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\* '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: SEPT 1, 2003 TO JUNE 30, 2008																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
26900 Indianapolis IN	40.67	24	36.92	4.17	8.33	45.83	41.67	2	1	0	0	0	+1	5.37	25.33	42.96	26.34
<b>Limited Review:</b>																	
11300 Anderson IN	6.04	5	7.69	0.00	20.00	60.00	20.00	0	0	0	0	0	0	2.80	16.93	52.62	27.64
14020 Bloomington IN	0.42	1	1.54	0.00	0.00	0.00	100.00	0	0	0	0	0	0	14.07	15.72	43.21	27.00
21140 Elkhart IN	14.91	13	20.00	7.69	7.69	84.62	0.00	0	0	0	0	0	0	0.45	6.06	88.14	5.36
29020 Kokomo IN	7.77	5	7.69	0.00	60.00	40.00	0.00	0	0	0	0	0	0	0.00	31.30	49.52	19.18
43780 South Bend IN	21.25	9	13.85	0.00	22.22	55.56	22.22	0	0	0	0	0	0	1.84	24.20	49.83	24.13
IN Non-MSA Areas	8.94	8	12.31	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, 2004 TO DECEMBER 31, 2007						
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
38860 Portland ME	37.23	1,689	206,706	1,340	210,079	1	25	20	89,701	3,050	506,511	58.04
<b>Limited Review:</b>												
12620 Bangor ME	12.67	586	40,160	428	74,105	23	2,907	1	85	1,038	117,257	7.70
30340 Lewiston ME	5.36	298	19,521	139	26,462	0	0	2	8,884	439	54,867	2.79
ME Non-MSA Areas	44.74	2,722	191,647	797	107,507	143	20,623	3	4,348	3,665	324,125	31.47

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: MAINE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
38860 Portland ME	259	32.54	0.32	1.16	8.72	9.65	75.71	66.80	15.26	22.39	0.45	2.00	0.51	0.39	0.71	
<b>Limited Review:</b>																
12620 Bangor ME	68	8.54	0.00	0.00	12.67	4.41	65.64	69.12	21.69	26.47	0.95	0.00	0.50	0.93	1.22	
30340 Lewiston ME	35	4.40	1.34	2.86	7.96	2.86	75.02	74.29	15.69	20.00	0.32	0.00	0.00	0.40	0.22	
ME Non-MSA Areas	434	54.52	0.00	0.00	4.60	7.14	84.99	85.48	10.41	7.37	1.26	0.00	2.23	1.23	1.11	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: MAINE								Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38860 Portland ME	411	25.15	0.32	0.49	8.72	9.98	75.71	78.83	15.26	10.71	2.55	0.00	2.60	2.71	1.57
<b>Limited Review:</b>															
12620 Bangor ME	198	12.12	0.00	0.00	12.67	11.11	65.64	73.23	21.69	15.66	5.56	0.00	6.60	5.88	3.91
30340 Lewiston ME	116	7.10	1.34	0.86	7.96	9.48	75.02	73.28	15.69	16.38	4.67	0.00	2.38	4.95	4.48
ME Non-MSA Areas	909	55.63	0.00	0.00	4.60	4.95	84.99	88.01	10.41	7.04	7.57	0.00	4.82	7.81	7.12

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: MAINE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38860 Portland ME	1,015	35.53	0.32	0.10	8.72	9.36	75.71	73.40	15.26	17.14	1.16	0.00	1.25	1.09	1.66
<b>Limited Review:</b>															
12620 Bangor ME	319	11.17	0.00	0.00	12.67	8.46	65.64	76.49	21.69	15.05	2.21	0.00	2.33	2.57	1.23
30340 Lewiston ME	147	5.15	1.34	0.00	7.96	8.16	75.02	78.23	15.69	13.61	1.33	0.00	0.75	1.37	1.53
ME Non-MSA Areas	1,376	48.16	0.00	0.00	4.60	4.94	84.99	86.19	10.41	8.87	2.60	0.00	4.30	2.55	2.39

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: MAINE					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
38860 Portland ME	4	50.00	6.36	0.00	24.62	0.00	64.22	100.00	4.79	0.00	2.56	0.00	0.00	3.90	0.00	
<b>Limited Review:</b>																
12620 Bangor ME	1	12.50	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	
30340 Lewiston ME	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	
ME Non-MSA Areas	3	37.50	0.00	0.00	8.31	0.00	82.91	100.00	8.77	0.00	1.45	0.00	0.00	1.92	0.00	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MAINE					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
<b>Full Review:</b>																
38860 Portland ME	1,340	49.56	1.79	1.34	15.16	17.09	71.20	68.51	11.85	13.06	1.27	0.85	1.76	1.32	0.95	
<b>Limited Review:</b>																
12620 Bangor ME	428	15.83	0.00	0.00	20.55	16.36	55.59	51.40	23.86	32.24	1.96	0.00	1.20	2.15	2.31	
30340 Lewiston ME	139	5.14	10.26	11.51	9.77	11.51	69.22	65.47	10.74	11.51	1.15	1.36	3.81	0.91	1.28	
ME Non-MSA Areas	797	29.47	0.00	0.00	4.96	4.64	83.60	84.69	11.44	10.66	0.98	0.00	0.96	1.05	0.96	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MAINE					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
<b>Full Review:</b>																
38860 Portland ME	1	0.60	0.84	0.00	8.71	0.00	72.61	100.00	17.84	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
12620 Bangor ME	23	13.77	0.00	0.00	17.03	26.09	64.49	73.91	18.48	0.00	12.24	0.00	33.33	12.12	0.00	
30340 Lewiston ME	0	0.00	2.76	0.00	3.31	0.00	74.59	0.00	19.34	0.00	0.00	0.00	0.00	0.00	0.00	
ME Non-MSA Areas	143	85.63	0.00	0.00	4.62	0.70	83.57	99.30	11.82	0.00	4.11	0.00	0.00	5.68	0.00	

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\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: MAINE				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans**	% Families33	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
38860 Portland ME	259	32.54	17.58	6.69	19.29	20.08	25.12	21.65	38.01	51.57	0.53	0.74	0.89	0.34	0.49	
<b>Limited Review:</b>																
12620 Bangor ME	68	8.54	20.39	5.97	17.26	20.90	23.04	19.40	39.31	53.73	1.07	2.67	0.75	0.50	1.37	
30340 Lewiston ME	35	4.40	18.49	12.50	18.69	18.75	24.29	43.75	38.53	25.00	0.34	0.00	0.43	0.47	0.22	
ME Non-MSA Areas	434	54.52	18.40	10.47	18.75	26.98	23.40	24.88	39.45	37.67	1.46	4.08	1.96	1.30	1.09	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

33 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 34	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38860 Portland ME	411	25.15	17.58	13.03	19.29	22.56	25.12	25.56	38.01	38.85	2.53	3.75	3.27	2.21	2.14
<b>Limited Review:</b>															
12620 Bangor ME	198	12.12	20.39	11.92	17.26	23.32	23.04	25.91	39.31	38.86	5.77	7.95	7.10	5.33	4.88
30340 Lewiston ME	116	7.10	18.49	7.83	18.69	20.87	24.29	25.22	38.53	46.09	4.88	3.77	6.15	3.11	5.71
ME Non-MSA Areas	909	55.63	18.40	11.44	18.75	22.44	23.40	24.56	39.45	41.56	7.71	10.47	7.84	7.41	7.24

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

34 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 35	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
38860 Portland ME	1,015	35.53	17.58	8.92	19.29	23.71	25.12	27.36	38.01	40.02	1.41	2.19	1.66	1.34	1.18
<b>Limited Review:</b>															
12620 Bangor ME	319	11.17	20.39	8.77	17.26	19.81	23.04	27.27	39.31	44.16	2.64	5.91	2.70	2.09	2.44
30340 Lewiston ME	147	5.15	18.49	6.29	18.69	27.27	24.29	30.07	38.53	36.36	1.60	1.15	2.53	1.80	1.02
ME Non-MSA Areas	1,376	48.16	18.40	7.43	18.75	23.11	23.40	28.38	39.45	41.08	3.13	5.11	4.22	3.12	2.30

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 2.6% of loans originated and purchased by bank.

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

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

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

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MAINE			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
38860 Portland ME	1,340	49.56	58.21	54.55	64.10	17.39	18.51	1.27	1.87
<b>Limited Review:</b>									
12620 Bangor ME	428	15.83	47.87	48.36	56.07	20.79	23.13	1.96	2.29
30340 Lewiston ME	139	5.14	47.14	58.99	59.71	17.27	23.02	1.15	1.96
ME Non-MSA Areas	797	29.47	49.14	60.48	65.75	18.44	15.81	0.98	1.28

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

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

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: MAINE		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
38860 Portland ME	1	0.60	95.70	100.00	100.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
12620 Bangor ME	23	13.77	94.93	56.52	65.22	26.09	8.70	12.24	12.50
30340 Lewiston ME	0	0.00	92.82	0.00	0.00	0.00	0.00	0.00	0.00
ME Non-MSA Areas	143	85.63	96.29	66.43	51.75	32.87	15.38	4.11	2.95

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MAINE				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
38860 Portland ME	40	5,790	19	11,281	59	17,072	79.85	19	5,259
<b>Limited Review</b>									
12620 Bangor ME	6	480	2	208	8	688	3.22	3	26
30340 Lewiston ME	4	319	2	61	6	380	1.78	4	39
ME Non-MSA Areas	14	2,720	8	521	22	3,240	15.16	3	49

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\* '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: SEPT 1, 2003 TO JUNE 30, 2008																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
38860 Portland ME	58.04	26	40.63	0.00	11.54	76.92	11.54	1	1	0	-1	+1	0	1.33	11.65	73.75	13.26
<b>Limited Review:</b>																	
12620 Bangor ME	7.70	7	10.94	0.00	14.29	71.43	14.29	0	0	0	0	0	0	0.00	19.01	59.64	21.35
30340 Lewiston ME	2.79	3	4.69	66.67	0.00	33.33	0.00	0	0	0	0	0	0	6.13	14.25	66.93	12.69
ME Non-MSA Areas	31.47	28	43.75	0.00	7.14	85.71	7.14	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, 2004 TO DECEMBER 31, 2007	
MA/Assessment Area (2007):	% 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)				
<b>Full Review:</b>															
19804 Wayne Cty MI	31.03	1,344	27,301	200	34,130	0	0	8	5,264	1,552	66,695	6.42			
47644 Oakland-Macomb M	32.85	1,370	44,974	269	52,522	0	0	4	4,881	1,643	102,377	10.66			
<b>Limited Review:</b>															
11460 Ann Arbor MI	14.39	370	28,531	344	49,838	0	0	6	9,703	720	88,072	62.89			
33780 Monroe MI	10.89	393	26,769	149	13,762	3	629	0	0	545	41,160	7.09			
MI Non-MSA Areas	10.84	435	22,080	106	12,759	1	100	0	0	542	34,939	12.94			
Statewide CD Loans with potential benefit to one or more AAs								13	86,751						

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa II	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						
<b>Full Review:</b>																
19804 Wayne Cty MI	16	8.16	3.81	0.00	22.11	6.25	38.26	31.25	35.82	62.50	0.00	0.00	0.00	0.00	0.01	
47644 Oakland-Macomb MI	54	27.55	0.79	0.00	17.10	1.85	52.51	81.48	29.60	16.67	0.01	0.00	0.01	0.02	0.01	
<b>Limited Review:</b>																
11460 Ann Arbor MI	36	18.37	2.07	2.78	13.42	30.56	55.60	30.56	28.90	36.11	0.09	0.28	0.17	0.04	0.12	
33780 Monroe MI	42	21.43	0.58	0.00	1.35	0.00	94.57	90.48	3.51	9.52	0.11	0.00	0.00	0.12	0.00	
MI Non-MSA Areas	48	24.49	0.00	0.00	2.23	0.00	61.80	66.67	35.97	33.33	0.58	0.00	0.00	0.76	0.37	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
19804 Wayne Cty MI	1,235	40.52	3.81	4.29	22.11	23.16	38.26	37.73	35.82	34.82	4.74	10.42	6.06	4.76	3.55	
47644 Oakland-Macomb MI	1,175	38.55	0.79	0.43	17.10	14.30	52.51	62.47	29.60	22.81	3.09	1.19	2.79	3.27	2.99	
<b>Limited Review:</b>																
11460 Ann Arbor MI	224	7.35	2.07	3.57	13.42	20.54	55.60	55.36	28.90	20.54	6.34	11.11	11.35	5.59	4.94	
33780 Monroe MI	192	6.30	0.58	1.04	1.35	2.08	94.57	92.19	3.51	4.69	6.76	0.00	10.00	6.66	10.53	
MI Non-MSA Areas	222	7.28	0.00	0.00	2.23	1.35	61.80	67.12	35.97	31.53	8.97	0.00	11.11	10.24	7.09	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
19804 Wayne Cty MI	93	14.05	3.81	2.15	22.11	29.03	38.26	33.33	35.82	35.48	0.04	0.00	0.03	0.04	0.05
47644 Oakland-Macomb MI	136	20.54	0.79	1.47	17.10	9.56	52.51	60.29	29.60	28.68	0.05	0.12	0.04	0.06	0.05
<b>Limited Review:</b>															
11460 Ann Arbor MI	110	16.62	2.07	2.73	13.42	18.18	55.60	45.45	28.90	33.64	0.32	0.42	0.44	0.20	0.49
33780 Monroe MI	159	24.02	0.58	0.63	1.35	1.26	94.57	94.34	3.51	3.77	0.74	0.00	1.25	0.74	0.55
MI Non-MSA Areas	164	24.77	0.00	0.00	2.23	0.00	61.80	54.27	35.97	45.73	0.84	0.00	0.00	0.70	1.05

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
19804 Wayne Cty MI	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	
47644 Oakland-Macomb MI	1	50.00	5.18	0.00	26.09	0.00	56.40	100.00	12.33	0.00	1.16	0.00	0.00	2.22	0.00	
<b>Limited Review:</b>																
11460 Ann Arbor MI	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	
33780 Monroe MI	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	
MI Non-MSA Areas	1	50.00	0.00	0.00	4.16	0.00	78.58	0.00	17.25	100.00	14.29	0.00	0.00	0.00	33.33	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans						
<b>Full Review:</b>																
19804 Wayne Cty MI	198	18.57	6.61	5.05	24.21	22.22	34.91	46.46	33.75	26.26	0.13	0.18	0.17	0.14	0.10	
47644 Oakland-Macomb MI	269	25.23	2.13	5.20	16.98	13.01	50.75	52.79	29.96	29.00	0.08	0.05	0.06	0.10	0.06	
<b>Limited Review:</b>																
11460 Ann Arbor MI	344	32.27	11.22	11.05	13.64	9.30	51.41	57.56	23.73	22.09	0.73	1.29	0.57	0.79	0.55	
33780 Monroe MI	149	13.98	0.91	0.00	2.84	2.01	93.89	97.32	2.36	0.67	1.38	0.00	1.45	1.42	0.88	
MI Non-MSA Areas	106	9.94	0.00	0.00	1.86	0.00	65.26	71.70	32.88	28.30	0.67	0.00	0.00	0.69	0.74	

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\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS																
Geography: MICHIGAN																
Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
19804 Wayne Cty MI	0	0.00	3.45	0.00	17.44	0.00	40.77	0.00	38.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
47644 Oakland-Macomb MI	0	0.00	1.29	0.00	14.66	0.00	59.65	0.00	24.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>																
11460 Ann Arbor MI	0	0.00	2.49	0.00	6.28	0.00	61.26	0.00	29.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00
33780 Monroe MI	3	75.00	0.00	0.00	0.19	0.00	97.18	100.00	2.63	0.00	1.03	0.00	0.00	0.00	1.05	0.00
MI Non-MSA Areas	1	25.00	0.00	0.00	0.44	0.00	62.63	100.00	36.93	0.00	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: MICHIGAN						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families36	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
19804 Wayne Cty MI	16	8.16	23.09	6.25	16.60	43.75	19.31	31.25	41.01	18.75	0.00	0.00	0.01	0.00	0.00
47644 Oakland-Macomb MI	54	27.55	17.64	22.64	18.11	20.75	23.75	22.64	40.50	33.96	0.02	0.00	0.02	0.01	0.03
<b>Limited Review:</b>															
11460 Ann Arbor MI	36	18.37	19.62	20.00	18.04	14.29	22.71	11.43	39.63	54.29	0.11	0.32	0.00	0.14	0.11
33780 Monroe MI	42	21.43	17.78	19.51	19.03	29.27	25.15	24.39	38.05	26.83	0.13	0.00	0.23	0.11	0.11
MI Non-MSA Areas	48	24.49	13.38	12.50	16.13	18.75	23.49	39.58	47.00	29.17	0.71	0.00	0.31	1.11	0.76

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

36 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, 2004 TO DECEMBER 31, 2007						Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families 37	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
19804 Wayne Cty MI	1,235	40.47	23.09	10.45	16.60	19.19	19.31	25.34	41.01	45.02	4.90	6.04	4.16	4.50	5.29	
47644 Oakland-Macomb MI	1,179	38.63	17.64	7.56	18.11	20.48	23.75	31.78	40.50	40.19	3.25	1.60	2.69	3.33	4.24	
<b>Limited Review:</b>																
11460 Ann Arbor MI	224	7.34	19.62	14.73	18.04	18.75	22.71	29.02	39.63	37.50	6.60	11.76	5.58	5.02	6.80	
33780 Monroe MI	192	6.29	17.78	10.42	19.03	24.48	25.15	26.56	38.05	38.54	6.88	4.55	6.71	4.37	10.99	
MI Non-MSA Areas	222	7.27	13.38	15.77	16.13	22.07	23.49	24.32	47.00	37.84	9.31	18.37	13.39	6.41	7.62	

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

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

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

37 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 38	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
19804 Wayne Cty MI	93	14.05	23.09	9.41	16.60	21.18	19.31	30.59	41.01	38.82	0.05	0.07	0.06	0.07	0.03
47644 Oakland-Macomb MI	136	20.54	17.64	11.85	18.11	33.33	23.75	26.67	40.50	28.15	0.07	0.07	0.08	0.06	0.07
<b>Limited Review:</b>															
11460 Ann Arbor MI	110	16.62	19.62	15.89	18.04	27.10	22.71	24.30	39.63	32.71	0.38	0.56	0.48	0.43	0.24
33780 Monroe MI	159	24.02	17.78	14.84	19.03	30.97	25.15	23.23	38.05	30.97	0.88	1.67	0.69	0.83	0.83
MI Non-MSA Areas	164	24.77	13.38	6.25	16.13	21.88	23.49	31.25	47.00	40.63	1.04	0.43	1.36	1.08	0.96

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

38 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
19804 Wayne Cty MI	200	18.73	69.30	61.50	65.50	12.00	22.50	0.13	0.21
47644 Oakland-Macomb MI	269	25.19	69.91	53.53	56.88	13.75	29.37	0.08	0.10
<b>Limited Review:</b>									
11460 Ann Arbor MI	344	32.21	69.93	55.81	65.12	16.57	18.31	0.73	1.29
33780 Monroe MI	149	13.95	66.08	68.46	74.50	18.12	7.38	1.38	1.86
MI Non-MSA Areas	106	9.93	67.29	62.26	75.47	11.32	13.21	0.67	1.05

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.75% 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
19804 Wayne Cty MI	0	0.00	96.19	0.00	0.00	0.00	0.00	0.00	0.00
47644 Oakland-Macomb MI	0	0.00	95.77	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
11460 Ann Arbor MI	0	0.00	96.45	0.00	0.00	0.00	0.00	0.00	0.00
33780 Monroe MI	3	75.00	96.24	66.67	66.67	0.00	33.33	1.03	1.16
MI Non-MSA Areas	1	25.00	98.44	100.00	100.00	0.00	0.00	0.00	0.00

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MICHIGAN				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
19804 Wayne Cty MI	50	2,794	46	16,528	96	19,322	65.08	71	9,949	
47644 Oakland-Macomb MI	8	529	8	870	16	1,399	4.71	13	420	
<b>Limited Review:</b>										
11460 Ann Arbor MI	6	787	21	4,020	27	4,807	16.19	7	1,268	
33780 Monroe MI	2	21	0	0	2	21	.07	1	27	
MI Non-MSA Areas	4	1,221	4	168	8	1,389	4.68	3	10	
<b>Statewide Qualified Investments with potential benefit to one or more AAs</b>	95	2,750	0	0	95	2,750	9.26	53	641	

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\* '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: SEPT 1, 2003 TO JUNE 30, 2008																	
MA/Assessment Area:	Deposits % of Rated Area Deposits in AA	Branches						Branch Openings/Closings						Population			
		# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
19804 Wayne Cty MI	6.42	4	11.43	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.80	30.49	33.77	27.85
47644 Oakland-Macomb MI	10.66	10	28.57	0.00	30.00	40.00	30.00	1	0	0	+1	0	0	1.73	18.59	51.65	28.01
<b>Limited Review:</b>																	
11460 Ann Arbor MI	62.89	10	28.57	10.00	10.00	80.00	0.00	0	0	0	0	0	0	11.48	18.11	48.69	21.72
33780 Monroe MI	7.09	4	11.43	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.03	2.15	93.50	3.33
MI Non-MSA Areas	12.94	7	20.00	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, 2004 TO DECEMBER 31, 2007												
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
41420 Salem OR	33.95	503	47,321	473	73,864	252	50,495	3	1,138	1,231	172,818	25.18
<b>Limited Review:</b>												
18700 Corvallis OR	3.42	67	6,102	27	4,375	29	4,518	1	6,656	124	21,651	1.38
21660 Eugene OR	23.30	469	45,277	323	37,930	53	11,252	0	0	845	94,459	25.84
32780 Medford OR	15.14	322	34,980	227	25,211	0	0	0	0	549	60,191	19.94
OR Non-MSA Areas	24.19	475	42,758	290	45,042	110	16,781	2	3,966	877	108,547	27.66
Statewide CD Loans with potential benefit to one or more AAs								6	4,099			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: OREGON				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
41420 Salem OR	93	38.27	0.09	1.08	14.36	25.81	59.70	52.69	25.85	20.43	0.21	0.00	0.32	0.21	0.11	
<b>Limited Review:</b>																
18700 Corvallis OR	10	4.12	0.00	0.00	26.55	80.00	28.42	0.00	45.02	20.00	0.08	0.00	0.00	0.00	0.19	
21660 Eugene OR	56	23.05	0.53	0.00	10.64	25.00	65.10	55.36	23.73	19.64	0.06	0.00	0.07	0.05	0.10	
32780 Medford OR	30	12.35	0.31	0.00	15.60	16.67	56.76	43.33	27.33	40.00	0.20	0.00	0.09	0.13	0.45	
OR Non-MSA Areas	54	22.22	0.00	0.00	7.14	3.70	68.80	74.07	24.06	22.22	0.17	0.00	0.00	0.19	0.15	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
41420 Salem OR	151	28.87	0.09	0.00	14.36	17.22	59.70	65.56	25.85	17.22	3.52	0.00	5.19	3.41	3.03
<b>Limited Review:</b>															
18700 Corvallis OR	26	4.97	0.00	0.00	26.55	38.46	28.42	26.92	45.02	34.62	3.33	0.00	5.13	2.00	3.28
21660 Eugene OR	111	21.22	0.53	0.00	10.64	9.91	65.10	70.27	23.73	19.82	3.00	0.00	1.85	3.38	2.44
32780 Medford OR	85	16.25	0.31	2.35	15.60	20.00	56.76	56.47	27.33	21.18	2.28	0.00	2.78	2.47	1.38
OR Non-MSA Areas	150	28.68	0.00	0.00	7.14	4.67	68.80	70.67	24.06	24.67	6.49	0.00	5.00	5.73	9.49

\* Based on 2006 Peer Mortgage Data (Western)

\*\* 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
41420 Salem OR	259	24.23	0.09	0.00	14.36	13.90	59.70	59.46	25.85	26.64	0.49	0.00	0.48	0.46	0.57
<b>Limited Review:</b>															
18700 Corvallis OR	31	2.90	0.00	0.00	26.55	22.58	28.42	32.26	45.02	45.16	0.62	0.00	0.67	0.24	0.84
21660 Eugene OR	301	28.16	0.53	0.33	10.64	6.31	65.10	66.78	23.73	26.58	0.57	1.79	0.31	0.62	0.53
32780 Medford OR	207	19.36	0.31	0.48	15.60	13.04	56.76	56.04	27.33	30.43	0.56	0.00	0.44	0.60	0.55
OR Non-MSA Areas	271	25.35	0.00	0.00	7.14	4.43	68.80	78.23	24.06	17.34	1.03	0.00	0.82	1.06	1.00

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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: OREGON				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
41420 Salem OR	0	0.00	0.46	0.00	40.27	0.00	41.61	0.00	17.66	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
18700 Corvallis OR	0	0.00	0.00	0.00	69.50	0.00	11.08	0.00	19.41	0.00	0.00	0.00	0.00	0.00	0.00	
21660 Eugene OR	1	100.00	14.02	0.00	28.02	0.00	42.14	100.00	15.82	0.00	2.17	0.00	0.00	4.55	0.00	
32780 Medford OR	0	0.00	4.18	0.00	38.22	0.00	32.71	0.00	24.89	0.00	0.00	0.00	0.00	0.00	0.00	
OR Non-MSA Areas	0	0.00	0.00	0.00	2.62	0.00	77.76	0.00	19.62	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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: OREGON						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
41420 Salem OR	473	35.30	0.25	0.00	23.14	20.72	58.57	56.45	18.04	22.83	1.02	0.00	1.27	1.12	0.82
<b>Limited Review:</b>															
18700 Corvallis OR	27	2.01	0.00	0.00	48.35	33.33	23.94	25.93	27.72	40.74	0.13	0.00	0.15	0.00	0.20
21660 Eugene OR	323	24.10	4.80	6.19	18.30	19.81	56.50	51.70	20.40	22.29	0.58	1.00	0.93	0.53	0.51
32780 Medford OR	227	16.94	6.35	6.61	24.50	30.40	48.58	40.09	20.58	22.91	0.67	1.30	0.99	0.65	0.40
OR Non-MSA Areas	290	21.64	0.00	0.00	8.59	1.72	67.92	72.07	23.49	26.21	0.87	0.00	0.14	1.09	0.69

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: OREGON						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
41420 Salem OR	252	56.76	0.00	0.00	8.22	0.00	74.45	77.78	17.34	22.22	11.88	0.00	0.00	11.41	18.18
<b>Limited Review:</b>															
18700 Corvallis OR	29	6.53	0.00	0.00	27.81	3.45	51.78	72.41	20.41	24.14	12.70	0.00	0.00	23.08	12.50
21660 Eugene OR	53	11.94	1.27	0.00	10.18	11.32	68.64	33.96	19.91	54.72	9.33	0.00	20.00	6.42	20.00
32780 Medford OR	0	0.00	2.00	0.00	18.42	0.00	58.74	0.00	20.83	0.00	0.00	0.00	0.00	0.00	0.00
OR Non-MSA Areas	110	24.77	0.00	0.00	6.10	0.00	70.18	85.45	23.73	14.55	10.98	0.00	0.00	14.06	3.28

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\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: OREGON				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families***	% BANK Loans**	% Families <sup>39</sup>	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
41420 Salem OR	93	38.27	18.49	11.11	18.97	31.11	23.62	23.33	38.92	34.44	0.25	1.16	0.36	0.16	0.21	
<b>Limited Review:</b>																
18700 Corvallis OR	10	4.12	19.62	10.00	18.42	30.00	22.30	20.00	39.65	40.00	0.11	0.00	0.34	0.00	0.10	
21660 Eugene OR	56	23.05	19.02	7.41	18.57	14.81	22.91	29.63	39.49	48.15	0.07	0.48	0.08	0.07	0.06	
32780 Medford OR	30	12.35	19.34	7.41	18.89	11.11	21.45	29.63	40.32	51.85	0.25	0.00	0.00	0.37	0.25	
OR Non-MSA Areas	54	22.22	18.50	3.70	17.85	24.07	22.88	42.59	40.77	29.63	0.22	0.00	0.63	0.33	0.09	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchased by bank.

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

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

39 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, 2004 TO DECEMBER 31, 2007									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 40	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
41420 Salem OR	151	28.87	18.49	6.71	18.97	30.20	23.62	24.16	38.92	38.93	3.58	5.41	6.13	2.19	3.23
<b>Limited Review:</b>															
18700 Corvallis OR	26	4.97	19.62	19.23	18.42	34.62	22.30	7.69	39.65	38.46	3.40	0.00	0.00	2.27	6.06
21660 Eugene OR	111	21.22	19.02	14.95	18.57	19.63	22.91	31.78	39.49	33.64	3.17	3.77	2.88	3.82	2.76
32780 Medford OR	85	16.25	19.34	7.14	18.89	14.29	21.45	27.38	40.32	51.19	2.41	7.14	2.31	3.52	1.55
OR Non-MSA Areas	150	28.68	18.50	8.67	17.85	16.00	22.88	20.00	40.77	55.33	6.92	14.29	8.51	5.03	6.84

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

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

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

40 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 41	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
41420 Salem OR	259	24.23	18.49	6.40	18.97	21.60	23.62	24.00	38.92	48.00	0.58	1.11	0.54	0.50	0.61
<b>Limited Review:</b>															
18700 Corvallis OR	31	2.90	19.62	3.33	18.42	20.00	22.30	33.33	39.65	43.33	0.76	0.00	0.76	0.87	0.79
21660 Eugene OR	301	28.16	19.02	10.88	18.57	17.35	22.91	24.49	39.49	47.28	0.72	1.73	0.90	0.76	0.55
32780 Medford OR	207	19.36	19.34	4.90	18.89	13.24	21.45	30.88	40.32	50.98	0.67	1.25	0.46	1.05	0.52
OR Non-MSA Areas	271	25.35	18.50	3.03	17.85	24.24	22.88	23.86	40.77	48.86	1.28	1.68	2.17	1.00	1.18

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by bank.

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

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

41 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
41420 Salem OR	473	35.30	66.95	54.97	66.81	13.95	19.24	1.02	1.37
<b>Limited Review:</b>									
18700 Corvallis OR	27	2.01	67.84	74.07	66.67	11.11	22.22	0.13	0.16
21660 Eugene OR	323	24.10	67.85	63.78	73.68	14.55	11.76	0.58	1.05
32780 Medford OR	227	16.94	68.76	73.13	70.93	16.30	12.78	0.67	1.31
OR Non-MSA Areas	290	21.64	69.20	59.66	63.79	15.52	20.69	0.87	1.41

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.60% 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
41420 Salem OR	252	56.76	92.50	65.08	36.11	32.94	30.95	11.88	11.17
<b>Limited Review:</b>									
18700 Corvallis OR	29	6.53	95.56	89.66	48.28	34.48	17.24	12.70	16.28
21660 Eugene OR	53	11.94	95.55	75.47	28.30	41.51	30.19	9.33	10.19
32780 Medford OR	0	0.00	95.86	0.00	0.00	0.00	0.00	0.00	0.00
OR Non-MSA Areas	110	24.77	95.15	74.55	47.27	37.27	15.45	10.98	12.32

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 2.03% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OREGON				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
41420 Salem OR	8	360	3	588	11	948	6.57	5	58
<b>Limited Review</b>									
18700 Corvallis OR	0	0	0	0	0	0	0.00	0	0
21660 Eugene OR	17	605	2	148	19	754	5.22	11	151
32780 Medford OR	2	7	6	8,199	8	8,206	56.83	2	7,872
OR Non-MSA Areas	3	4	4	4,527	7	4,531	31.38	2	4,522

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\* '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: SEPT 1, 2003 TO JUNE 30, 2008																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
41420 Salem OR	25.18	8	26.67	0.00	12.50	75.00	12.50	0	0	0	0	0	0	0.98	21.38	56.75	20.89
<b>Limited Review:</b>																	
18700 Corvallis OR	1.38	1	3.33	0.00	100.00	0.00	0.00	1	0	0	+1	0	0	0.00	43.47	23.14	33.39
21660 Eugene OR	25.84	8	26.67	0.00	25.00	62.50	12.50	0	0	0	0	0	0	2.90	14.69	61.85	20.56
32780 Medford OR	19.94	5	16.67	20.00	20.00	40.00	20.00	0	0	0	0	0	0	1.16	22.53	52.66	23.65
OR Non-MSA Areas	27.66	8	26.67	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, 2004 TO DECEMBER 31, 2007						
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
41620 Salt Lake UT	57.32	1,224	127,745	1,170	232,320	46	3,681	12	31,870	2,452	395,616	87.90
<b>Limited Review:</b>												
30860 Logan UT	2.55	42	2,601	53	13,299	14	1,392	0	0	109	17,292	1.01
36260 Ogden UT	21.69	501	33,990	425	63,045	2	98	0	0	928	97,133	6.65
39340 Provo UT	11.92	302	18,510	207	54,194	1	22	0	0	510	72,726	1.77
UT Non-MSA Areas	6.52	133	5,780	85	5,817	61	3,518	0	0	279	15,115	2.67
Statewide CD Loans with potential benefit to one or more AAs								1	69			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: UTAH				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
41620 Salt Lake UT	194	61.20	0.20	0.52	16.53	27.32	52.75	44.33	30.52	27.84	0.08	0.39	0.17	0.06	0.08	
<b>Limited Review:</b>																
30860 Logan UT	9	2.84	0.31	0.00	20.62	33.33	42.42	33.33	36.65	33.33	0.13	0.00	0.19	0.00	0.24	
36260 Ogden UT	63	19.87	0.85	4.76	13.75	15.87	58.75	58.73	26.65	20.63	0.03	0.00	0.02	0.04	0.02	
39340 Provo UT	37	11.67	1.44	0.00	11.29	5.41	53.20	59.46	34.07	35.14	0.02	0.00	0.04	0.02	0.00	
UT Non-MSA Areas	14	4.42	0.00	0.00	4.89	0.00	63.18	85.71	31.93	14.29	0.13	0.00	0.00	0.21	0.00	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
41620 Salt Lake UT	425	49.94	0.20	0.24	16.53	18.12	52.75	57.65	30.52	24.00	1.78	0.00	2.91	1.59	1.74
<b>Limited Review:</b>															
30860 Logan UT	19	2.23	0.31	0.00	20.62	31.58	42.42	36.84	36.65	31.58	1.60	0.00	5.71	1.72	0.00
36260 Ogden UT	192	22.56	0.85	0.52	13.75	15.63	58.75	65.10	26.65	18.75	1.88	10.00	3.21	1.81	1.46
39340 Provo UT	149	17.51	1.44	1.34	11.29	11.41	53.20	59.06	34.07	28.19	1.80	0.00	1.79	2.25	1.18
UT Non-MSA Areas	66	7.76	0.00	0.00	4.89	3.03	63.18	66.67	31.93	30.30	7.32	0.00	12.50	9.21	3.49

\* Based on 2006 Peer Mortgage Data (Western)

\*\* 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, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
41620 Salt Lake UT	604	58.53	0.20	0.17	16.53	7.62	52.75	54.14	30.52	38.08	0.27	1.23	0.14	0.28	0.30	
<b>Limited Review:</b>																
30860 Logan UT	14	1.36	0.31	0.00	20.62	28.57	42.42	28.57	36.65	42.86	0.18	0.00	0.52	0.11	0.12	
36260 Ogden UT	245	23.74	0.85	0.82	13.75	15.92	58.75	56.73	26.65	26.53	0.25	0.00	0.53	0.17	0.34	
39340 Provo UT	116	11.24	1.44	3.45	11.29	10.34	53.20	45.69	34.07	40.52	0.18	0.44	0.29	0.20	0.12	
UT Non-MSA Areas	53	5.14	0.00	0.00	4.89	3.77	63.18	79.25	31.93	16.98	0.70	0.00	0.00	1.00	0.31	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
41620 Salt Lake UT	1	50.00	3.14	0.00	49.56	0.00	36.55	100.00	10.76	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
30860 Logan UT	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	
36260 Ogden UT	1	50.00	10.10	0.00	37.79	0.00	42.96	100.00	9.15	0.00	0.00	0.00	0.00	0.00	0.00	
39340 Provo UT	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	
UT Non-MSA Areas	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 2006 Peer Mortgage Data (Western)

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

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

\*\*\*\* 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
41620 Salt Lake UT	1,170	60.31	7.71	14.79	21.18	27.95	40.13	38.38	30.98	18.89	0.61	1.45	0.89	0.59	0.38
<b>Limited Review:</b>															
30860 Logan UT	53	2.73	1.35	0.00	36.51	39.62	35.78	47.17	26.36	13.21	0.32	0.00	0.27	0.54	0.11
36260 Ogden UT	425	21.91	5.58	8.71	16.95	36.24	50.86	33.65	26.61	21.41	0.69	0.95	1.87	0.50	0.46
39340 Provo UT	207	10.67	3.49	0.00	13.61	12.08	48.61	56.52	34.26	31.40	0.30	0.00	0.43	0.32	0.28
UT Non-MSA Areas	85	4.38	0.00	0.00	10.36	9.41	62.12	81.18	27.52	9.41	1.33	0.00	1.78	1.81	0.51

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: UTAH					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
<b>Full Review:</b>																
41620 Salt Lake UT	46	37.10	3.60	0.00	15.52	2.17	47.11	97.83	33.77	0.00	6.63	0.00	0.00	12.64	0.00	
<b>Limited Review:</b>																
30860 Logan UT	14	11.29	0.85	0.00	13.39	0.00	58.97	71.43	26.78	28.57	6.12	0.00	0.00	5.71	10.00	
36260 Ogden UT	2	1.61	2.92	0.00	12.88	0.00	58.70	50.00	25.50	50.00	0.00	0.00	0.00	0.00	0.00	
39340 Provo UT	1	0.81	1.01	0.00	6.80	0.00	59.32	100.00	32.87	0.00	0.00	0.00	0.00	0.00	0.00	
UT Non-MSA Areas	61	49.19	0.00	0.00	1.07	0.00	65.33	59.02	33.60	40.98	7.22	0.00	0.00	9.18	5.97	

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\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: UTAH				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans**	% Families42	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
41620 Salt Lake UT	194	61.20	16.76	17.46	19.97	32.80	24.84	15.34	38.44	34.39	0.09	0.59	0.14	0.08	0.04	
<b>Limited Review:</b>																
30860 Logan UT	9	2.84	17.17	0.00	20.15	22.22	23.47	11.11	39.21	66.67	0.15	0.00	0.14	0.00	0.29	
36260 Ogden UT	63	19.87	15.96	12.70	20.32	31.75	25.67	20.63	38.05	34.92	0.04	0.06	0.06	0.01	0.03	
39340 Provo UT	37	11.67	17.70	2.86	19.40	14.29	24.45	34.29	38.45	48.57	0.02	0.00	0.05	0.00	0.03	
UT Non-MSA Areas	14	4.42	13.69	7.14	16.82	35.71	23.66	35.71	45.83	21.43	0.15	0.00	0.24	0.16	0.11	

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by bank.

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

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

42 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, 2004 TO DECEMBER 31, 2007						Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families 43	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
41620 Salt Lake UT	425	49.94	16.76	7.13	19.97	24.47	24.84	30.64	38.44	37.77	1.88	2.53	2.27	1.62	1.85	
<b>Limited Review:</b>																
30860 Logan UT	19	2.23	17.17	21.05	20.15	0.00	23.47	36.84	39.21	42.11	1.87	8.33	0.00	3.23	0.93	
36260 Ogden UT	192	22.56	15.96	12.70	20.32	24.34	25.67	32.28	38.05	30.69	1.92	6.52	1.45	2.62	1.01	
39340 Provo UT	149	17.51	17.70	7.43	19.40	25.68	24.45	21.62	38.45	45.27	1.92	12.00	4.44	1.76	1.09	
UT Non-MSA Areas	66	7.76	13.69	3.13	16.82	18.75	23.66	23.44	45.83	54.69	7.80	20.00	9.38	9.84	5.83	

\* Based on 2006 Peer Mortgage Data (Western)

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

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

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

43 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, 2004 TO DECEMBER 31, 2007									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 44	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
41620 Salt Lake UT	604	58.53	16.76	5.35	19.97	17.79	24.84	25.73	38.44	51.12	0.30	0.41	0.35	0.18	0.35
<b>Limited Review:</b>															
30860 Logan UT	14	1.36	17.17	0.00	20.15	14.29	23.47	35.71	39.21	50.00	0.22	0.00	0.38	0.39	0.10
36260 Ogden UT	245	23.74	15.96	5.02	20.32	27.62	25.67	24.69	38.05	42.68	0.30	0.26	0.61	0.20	0.25
39340 Provo UT	116	11.24	17.70	3.60	19.40	11.71	24.45	31.53	38.45	53.15	0.21	0.00	0.11	0.28	0.19
UT Non-MSA Areas	53	5.14	13.69	6.00	16.82	14.00	23.66	22.00	45.83	58.00	0.85	3.03	0.58	0.49	1.02

\* Based on 2006 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchased by bank.

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

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

44 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
41620 Salt Lake UT	1,170	60.31	63.70	52.56	54.19	19.49	26.32	0.61	0.88
<b>Limited Review:</b>									
30860 Logan UT	53	2.73	64.04	43.40	52.83	15.09	32.08	0.32	0.27
36260 Ogden UT	425	21.91	63.81	58.35	66.82	15.76	17.41	0.69	1.00
39340 Provo UT	207	10.67	64.14	52.17	53.62	14.49	31.88	0.30	0.49
UT Non-MSA Areas	85	4.38	61.49	75.29	85.88	8.24	5.88	1.33	2.50

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.31% 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
41620 Salt Lake UT	46	37.10	94.85	97.83	86.96	8.70	4.35	6.63	7.63
<b>Limited Review:</b>									
30860 Logan UT	14	11.29	97.15	64.29	78.57	7.14	14.29	6.12	3.41
36260 Ogden UT	2	1.61	95.62	100.00	100.00	0.00	0.00	0.00	0.00
39340 Provo UT	1	0.81	95.09	100.00	100.00	0.00	0.00	0.00	0.00
UT Non-MSA Areas	61	49.19	96.80	100.00	85.25	9.84	4.92	7.22	8.50

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: UTAH				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
41620 Salt Lake UT	19	3,766	63	27,787	82	31,552	77.78	12	10,804
<b>Limited Review:</b>									
30860 Logan UT	2	8	0	0	2	8	.02	1	20
36260 Ogden UT	4	718	3	7,145	7	7,863	19.38	1	6,401
39340 Provo UT	7	38	9	58	16	96	.24	2	25
UT Non-MSA Areas	1	300	0	0	1	300	.74	0	0
<b>Statewide Qualified Investments with potential benefit to one or more AAs</b>	1	746	0	0	1	746	1.84	1	23

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\* '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: SEPT 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
<b>Full Review:</b>																							
41620 Salt Lake UT	87.90	22	56.41	4.55	22.73	50.00	22.73	1	0	0	0	+1	0	0.79	22.59	49.65	26.97						
<b>Limited Review:</b>																							
30860 Logan UT	1.01	1	2.56	0.00	100.00	0.00	0.00	0	0	0	0	0	0	4.30	32.60	35.15	27.95						
36260 Ogden UT	6.65	9	23.08	11.11	33.33	55.56	0.00	1	0	0	+1	0	0	2.33	17.15	55.26	25.26						
39340 Provo UT	1.77	3	7.69	0.00	33.33	66.67	0.00	0	0	0	0	0	0	9.06	14.93	47.32	28.54						
UT Non-MSA Areas	2.67	4	10.26	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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area (2007):	% 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)	
<b>Full Review:</b>												
15540 Burlington VT	58.30	407	47,670	354	59,816	2	550	3	8,035	766	116,071	79.25
<b>Limited Review:</b>												
VT Non-MSA Areas	41.70	364	33,706	180	39,226	2	560	2	1,601	548	75,093	20.75
Statewide CD Loans with potential benefit to one or more AAs								12	164,049			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: VERMONT					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
15540 Burlington VT	93	66.43	0.38	4.30	11.02	16.13	58.88	60.22	29.72	19.35	0.40	0.00	0.87	0.33	0.39	
<b>Limited Review:</b>																
VT Non-MSA Areas	47	33.57	0.00	0.00	6.11	10.64	79.20	74.47	14.69	14.89	0.30	0.00	1.11	0.28	0.00	

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\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: VERMONT				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
15540 Burlington VT	82	51.57	0.38	0.00	11.02	7.32	58.88	71.95	29.72	20.73	1.53	0.00	0.69	1.21	2.83	
<b>Limited Review:</b>																
VT Non-MSA Areas	77	48.43	0.00	0.00	6.11	6.49	79.20	85.71	14.69	7.79	1.41	0.00	0.00	1.85	0.00	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: VERMONT				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
15540 Burlington VT	232	49.26	0.38	0.86	11.02	9.91	58.88	64.66	29.72	24.57	1.56	2.38	0.99	1.78	1.32
<b>Limited Review:</b>															
VT Non-MSA Areas	239	50.74	0.00	0.00	6.11	4.18	79.20	82.01	14.69	13.81	1.57	0.00	1.15	1.67	1.29

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: VERMONT				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
15540 Burlington VT	0	0.00	6.01	0.00	22.15	0.00	53.50	0.00	18.33	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
VT Non-MSA Areas	1	100.00	0.00	0.00	14.52	0.00	57.44	0.00	28.04	100.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2006 Peer Mortgage Data (Eastern)

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

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

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

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: VERMONT								Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
15540 Burlington VT	354	66.29	1.67	0.00	18.32	21.47	51.71	48.59	28.30	29.94	1.02	0.00	1.38	0.98	1.07
<b>Limited Review:</b>															
VT Non-MSA Areas	180	33.71	0.00	0.00	10.10	20.00	72.34	69.44	17.56	10.56	0.43	0.00	0.76	0.38	0.57

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: VERMONT					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans						
<b>Full Review:</b>																
15540 Burlington VT	2	50.00	0.30	0.00	13.83	0.00	62.56	0.00	23.31	100.00	1.43	0.00	0.00	0.00	6.67	
<b>Limited Review:</b>																
VT Non-MSA Areas	2	50.00	0.00	0.00	2.93	0.00	83.58	100.00	13.49	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: VERMONT						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families45	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
15540 Burlington VT	93	66.43	17.48	14.44	19.50	34.44	24.68	26.67	38.34	24.44	0.48	0.00	0.97	0.46	0.30
<b>Limited Review:</b>															
VT Non-MSA Areas	47	33.57	16.74	4.55	18.52	25.00	24.64	29.55	40.09	40.91	0.30	0.00	0.51	0.65	0.10

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 4.3% of loans originated and purchased by bank.

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

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

45 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, 2004 TO DECEMBER 31, 2007									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 46	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
15540 Burlington VT	82	51.57	17.48	9.88	19.50	28.40	24.68	20.99	38.34	40.74	1.60	0.71	1.05	1.16	2.82
<b>Limited Review:</b>															
VT Non-MSA Areas	77	48.43	16.74	10.53	18.52	17.11	24.64	32.89	40.09	39.47	1.49	3.51	2.03	0.80	1.31

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

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

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

46 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, 2004 TO DECEMBER 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families 47	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
15540 Burlington VT	232	49.26	17.48	17.18	19.50	24.23	24.68	28.19	38.34	30.40	1.92	2.49	2.41	1.76	1.52
<b>Limited Review:</b>															
VT Non-MSA Areas	239	50.74	16.74	6.81	18.52	31.06	24.64	32.34	40.09	29.79	1.90	2.16	2.95	1.96	1.31

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by bank.

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

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

47 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, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
15540 Burlington VT	354	66.29	60.08	49.72	57.63	20.34	22.03	1.02	1.33
<b>Limited Review:</b>									
VT Non-MSA Areas	180	33.71	62.20	67.78	60.56	11.67	27.78	0.43	0.74

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.19% of small loans to businesses originated and purchased by the bank.

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: VERMONT			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
15540 Burlington VT	2	50.00	98.20	50.00	0.00	50.00	50.00	1.43	0.00
<b>Limited Review:</b>									
VT Non-MSA Areas	2	50.00	97.65	0.00	50.00	0.00	50.00	0.00	0.00

\* Based on 2006 Peer Small Business Data -- US and PR

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: VERMONT				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
15540 Burlington VT	2	250	31	7,904	33	8,154	43.62	5	3,881
<b>Limited Review:</b>									
VT Non-MSA Areas	2	351	15	9,989	17	10,340	55.31	2	1,121
<b>Statewide Qualified Investments with potential benefit to one or more AAs</b>	2	200	0	0	2	200	1.07	0	0

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\* '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: SEPT 1, 2003 TO JUNE 30, 2008																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
15540 Burlington VT	79.25	9	69.23	0.00	22.22	55.56	22.22	1	0	0	0	0	+1	1.51	13.36	58.93	26.21
<b>Limited Review:</b>																	
VT Non-MSA Areas	20.75	4	30.77	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	8.43	78.37	13.20

**Table 1. Lending Volume**

LENDING VOLUME - ADDITIONAL CD LOAN DATA		Geography: REGIONAL / OUTSIDE OF ANY AA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2007				
MA/Assessment Area (2007):	% 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)	
<b>Limited Review:</b>												
CD Loans in Regional Area no potential to benefit any								249	129,912			

\* Loan Data as of December 31, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2007.

\*\*\* Deposit Data as of May 12, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 14. Qualified Investments**

ADDITIONAL QUALIFIED INVESTMENTS DATA		Geography: REGIONAL / OUTSIDE OF ANY AA			Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Qualified Investments located in the regional area with potential benefit to one or more AAs</b>	46	23,829	32	108,435	78	132,264	100.00	53	39,614

\* '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**

ADDITIONAL QUALIFIED INVESTMENTS DATA		Geography: REGIONAL / OUTSIDE OF ANY AA				Evaluation Period: SEPTEMBER 1, 2003 TO JUNE 30, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Qualified Investments located in regional area with no potential benefit to any AA</b>	6	2,134	9	18,906	15	21,040	100.00	11	5,803

\* '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.