



PUBLIC DISCLOSURE

January 1, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Huntington National Bank
Charter Number: 7745

17 South High Street
Columbus, Ohio 43216

Office of the Comptroller of the Currency

Midsized Banks
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Chicago, Illinois 60606

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

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General Information and Overall CRA Rating

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **Huntington National Bank** issued by the OCC, the institution's supervisory agency, for the evaluation period starting January 1, 2007 and ending December 31, 2011. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

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

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

Performance Levels	The Huntington National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- While the bank's performance under the Lending Test, Investment Test, and Service Test, as noted in the table above, would have warranted an outstanding rating, the overall CRA rating was lowered from outstanding to satisfactory as discussed within the Fair Lending and Other Illegal Credit Practices section of this document.
- Huntington's responsiveness to community credit needs was excellent during the evaluation period, which included a time when the economy was significantly affected by a recession that affected the ability of many individuals and businesses to borrow. Outstanding performance is reflected in rating areas representing 90 percent of the bank's deposits.

- Community development (CD) lending is very strong, and elevates otherwise good lending performance to the excellent level. Performance is excellent in six rating areas representing 90 percent of the bank's deposits. Huntington made 538 community development loans totaling nearly \$1.1 billion that benefit its assessment areas. With a focus on affordable housing, community development lending reflects excellent responsiveness to the needs of the local communities. Community development lending within the bank's assessment areas represents 25 percent of Tier One capital.
- The geographic distribution of loans is good, including loans made in low- and moderate-income neighborhoods. Home mortgage performance is good in both primary rating areas. Small loans to businesses performance is good in the Ohio primary rating area, and excellent in the Michigan primary rating area. Performance is good in seven of the ten rating areas, including both primary rating areas. Performance is adequate in three areas.
- The borrower distribution of lending is good overall, including loans made to low- and moderate-income borrowers and businesses of different sizes. Home mortgage performance and small loans to business performance is good in both primary rating areas. Performance is good or excellent in nine of the 10 rating areas, including both primary rating areas, and adequate in one area.
- Qualified investment activity is good, stemming from both the bank and its subsidiary, the Huntington Community Development Corporation. Centered in low-income housing tax credit funds, investment activity is especially responsive to the affordable housing needs of the local communities. Performance is good or excellent in seven rating areas representing 88 percent of the bank's deposits. While many investments are comprised of investor funds, sizeable investments are in individual projects and single-investor funds where Huntington is directly involved in the financing plans of the projects. Huntington also made grants to local community organizations totaling \$6.2 million to support local community development initiatives within its assessment areas.
- Delivery systems provide good accessibility of products and services to areas and individuals of different income levels, including the low- and moderate-income segments of the communities. Branches often offer extended hours, including weekends. Performance is good or excellent in nine of the ten rating areas, while performance in one rating area is adequate.
- Community development service activity is good. Huntington officers and employees use their financial expertise to address a wide range of community needs. Financial literacy needs are addressed through credit counseling, first-time home buyer seminars, home foreclosure prevention workshops, and other financial education programs targeted to low- and moderate-income individuals. Huntington officers and employees serve on lending and loan review committees, as well as in other financial-related capacities on boards and committees. A Home Saver Solutions team was created to inform distressed homeowners of options available to help keep their homes. Technical assistance was provided to organizations submitting Affordable Housing Grant applications to the Federal Home Loan Bank of Cincinnati that resulted in 41 grants totaling nearly \$14 million for the creation or rehabilitation of over 900 housing units.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and

sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

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

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

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

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

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of 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 (MD): 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 (MSA): An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

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

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

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

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

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

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If

an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

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

The Huntington National Bank (Huntington or bank) is an interstate bank headquartered in Columbus, Ohio. Huntington operates in seven states with 716 offices in Ohio, Michigan, Pennsylvania, Indiana, West Virginia, Kentucky, and Florida. As of December 31, 2011, Huntington had total assets of \$54.2 billion. Customers are served through a banking network of traditional branches, convenience branches located in grocery stores and retirement centers, and through alternative distribution channels including Internet and mobile banking, telephone banking, and nearly 1,300 automated teller machines (ATMs). The bank is a wholly owned subsidiary of Huntington Bancshares Incorporated (HBI), a \$54.5 billion holding company also headquartered in Columbus. Huntington offers a wide range of consumer and commercial banking products and services through four major lines of business.

- The Retail and Business Banking group provides deposit services and loan products to consumer and small business customers. Other financial services provided include leasing, insurance, and treasury management. Huntington also offers agricultural loans based upon local needs, but they are not a focus for the bank.
- The Commercial Banking group serves the middle market and large corporate clients. Loans, deposit services, treasury management, equipment and technology leasing, international services, capital markets services, and employee benefit programs are offered.
- The Automobile Finance and Commercial Real Estate group provides lending and other banking products and services to automotive dealerships, retail customers who obtain financing at the dealerships, professional real estate developers, real estate investment trusts, and other customers with lending needs that are secured by commercial properties.
- The Wealth Advisors, Government Finance, and Home Lending segment focuses on home lending, wealth management, and government finance. In addition, bank subsidiaries support the bank's operations and provide ancillary services.

Subsidiaries include asset advisors that provide investment management services; real estate management companies; asset securitization entities; a merchant card services operation, and companies that provide and supplement the provisions of international trade activities. The Huntington Community Development Corporation (HCDC) is a subsidiary that focuses on community development initiatives. At the bank's request, we considered investments made by HCDC during this evaluation as this affiliate increases Huntington's capacity to reinvest in the community through qualified investments. Activities of the other subsidiaries do not materially affect the bank's capacity for community investment.

Merger and acquisition activity during the evaluation period resulted in the bank's growth in size and an expansion of its community footprint and number of assessment areas. On July 1, 2007, HBI completed its merger with Sky Financial Group, Inc. a \$16.8 billion bank holding company based in Bowling Green, Ohio. Sky Financial served communities in Ohio, Pennsylvania, Indiana, Michigan, and West Virginia. Sky Financial's assets and deposits were merged with the Huntington bank on September 22, 2007. While Huntington's and Sky

Financial's operations overlapped in some markets, the merger resulted in Huntington entering the following new market areas: Erie, New Castle (Lawrence County AA) and Pittsburgh, Pennsylvania; Wheeling, West Virginia; Weirton, East Liverpool (Ohio non-MSA AA), and Youngstown, Ohio; Monroe and Adrian (Michigan non-MSA AA), Michigan, and Fort Wayne, Indiana. On October 3, 2009, Huntington assumed the deposits of Warren Bank located in Macomb County, Michigan. Huntington purchased the bank's six banking offices from the Federal Deposit Insurance Corporation and assumed approximately \$400 million of deposits, but did not acquire any of Warren Bank's loans. HNB's acquisition of Warren Bank's offices did not expand or create any new AAs for the bank. The acquired branches were located in existing bank AAs.

As of December 31, 2011, loans represented 75 percent of total assets. Huntington's loan portfolio consisted of 24 percent commercial (including commercial real estate), 56 percent residential real estate, 16 percent consumer; 3 percent lease financing receivables and 1 percent other loans. Huntington had Tier One Capital of \$4.3 billion as of year-end 2011. As a result of merger activity and participation in the Troubled Asset Relief Program (TARP) Capital Purchase Program, Huntington's Tier One capital level increased by 104 percent and averaged \$3.3 billion during the evaluation period.

No financial or legal impediments hindered Huntington's ability to address community needs during the evaluation period. The last CRA evaluation was performed as of January 1, 2007 and resulted in a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is January 1, 2007 to December 31, 2011. We analyzed home mortgage lending data, CRA data (small loans to businesses and farms), CD loans, qualified investments, branching activities, and CD services from January 1, 2007 through December 31, 2011. Data for Sky Financial activity prior to its merger with Huntington is not included within the scope of this evaluation. HNB filed separate Sky Bank CRA & HMDA data for January 1, 2007 through June 30, 2007. Accordingly, the evaluation period for the AAs new to Huntington is July 1, 2007 to December 31, 2011.

Data Integrity

The accuracy of public information filed by the bank for home mortgage loans and small loans to businesses and farms was tested for accuracy. While found to be substantially correct, a small segment of home mortgage activity was inadvertently omitted by the bank when filing its original data. We confirmed that the omitted data does not materially affect the bank's performance in any assessment area. We also reviewed CD loans, qualified investments, and CD services to ensure that they meet the regulatory definition of CD. We found the data to be substantially accurate, although some corrections to reported CD activities were needed. This evaluation is based on accurate CD information.

Selection of Areas for Full-Scope Review

In each state and multistate metropolitan area where the bank has an office, a sample of assessment areas (AAs) within that state/multistate metropolitan area was selected for full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section 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. The states of Ohio and Michigan are primary rating areas and carry the most weight as these areas represent the bank's most significant markets in regard to deposits, reported loans, qualified investments, and service activity. Performance within the state of Ohio is weighted the heaviest as more than half of the bank's deposits, reported loans and qualified investments are from Ohio.

The multistate metropolitan area ratings and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The bank's evaluation period occurred during a time of unprecedented economic volatility. The U.S. recession began during the first year of Huntington's evaluation period, which was followed by a time of economic volatility triggered by a liquidity crisis in the U.S. banking system. This resulted in layoffs creating high unemployment rates across the country.

Throughout the U.S., the housing market began deteriorating as a result of mortgage delinquencies, an increase in evictions, foreclosures, and prolonged vacancies. This resulted in a decrease in housing valuations. The impact of these economic changes, combined with a tightening of mortgage underwriting standards, impacted a homeowner's ability to refinance due to credit and collateral constraints. The following is contextual information illustrating the economic climate and housing market the bank operated in during the evaluation period. The Midwest included some of the hardest hit areas in the United States. The majority of the bank's AAs experienced foreclosure filings at the rate of one in every 100 to 999 units of housing. Especially hard hit was the Detroit-Warren-Livonia MSA, which experienced foreclosure filing rates of one foreclosure for every ten to 99 units. Huntington's ability to refinance was adversely impacted by the economic factors outlined in the market profiles included in appendix C, along with the decline in home valuations, which eliminated a significant amount of homeowner equity during the financial crisis. Beginning in January 2008, Fannie Mae, Freddie Mac, along with mortgage insurance companies implemented policy guidelines for distressed and declining housing markets with many of the markets located in Huntington's AAs. Loan transactions for properties located in the designated distressed markets required higher down payments and/or equity requirements, LTVs were capped at 90 percent, and minimum credit scores ranged from 680 to 700. Huntington offered the Home Affordable Refinance Program (HARP) to its customers; however, the LTV on the original HARP program was capped at 125 percent. Many of the homeowner's LTV's exceeded 125 percent, limiting the effectiveness of the program.

Factors Considered in our Analysis under Each Performance Test

Performance is based on analyses of activity within the bank's assessment areas. Huntington reports multiple assessment areas comprised of non-MSA counties in some states. For analysis purposes, we combined all non-MSA counties in a state to form one non-MSA assessment area for the state.

Lending Test

When evaluating the bank's performance under the lending test, we placed a higher value on the bank's distribution of home mortgage loans than the distribution of small business loans. Within the home mortgage category, greater weight was placed on home refinance and home purchase loans, with home improvement loans receiving substantially less weight. We placed emphasis on home loans due to it being the bank's primary loan product and based on the affordable housing credit needs in all AAs. Secondary emphasis was placed on small business loan performance due to the identified community credit need in all AAs.

Analyses were not conducted for any loan product unless Huntington originated/purchased at least 30 loans within the AA. Generally, we found that analysis on fewer than 30 loans did not provide meaningful conclusions. The bank did not originate or purchase a sufficient volume of multifamily loans in any AA to perform a meaningful analysis. While activity levels relative to small loans to farms was sufficient for analysis in a few areas, small farm lending had no material impact on any conclusions.

Market share analyses within the geographic and borrower income distribution criteria were only conducted when Huntington achieved an overall market share that exceeded one percent for a particular loan product in the AA. Market share analyses on smaller levels did not provide meaningful conclusions.

In evaluating the bank's lending performance, equal weighting was generally given to the geographic and borrower distribution components of the Lending Test.

When conducting the geographic distribution analysis, greater consideration was given to performance in moderate-income tracts if there were a limited number of owner-occupied housing units or businesses located within low-income tracts.

Inside/Outside Ratio: A significant portion of originated and purchased loans reported by Huntington during the evaluation period is within the bank's AAs. Overall, 86 percent of the number of loans and 83 percent of loan dollars are within the bank's AAs. Eighty-four percent of the number of home mortgage loans and 78 percent of loan dollars are within the AAs. Within home mortgage loans, 78 percent of home purchase, 88 percent of home improvement, and 86 percent of home refinance loans in number are within the bank's AAs. Furthermore, 91 percent of small loans to businesses and 94 percent of small loans to farms in number are within the bank's AAs. And, 89 percent of CD loan dollars are within the AAs. These calculations are done on a bank-wide basis. This record of AA lending was given positive consideration when drawing conclusions relative to the overall geographic distribution of lending performance for the bank as a whole.

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 population that lives below the poverty line to afford and maintain a home. This has a particular impact on the opportunity to lend to the low-income population of the community. Refer to the market profiles in appendix C for demographic information, including poverty rates.

The assessment of CD lending focused on its impact of addressing community needs. CD lending is assessed based on the bank's capacity, and the AA's needs, opportunities, and competition for CD lending.

Investment Test

Huntington has invested in a variety of investment funds, including statewide and regional funds that have had an impact on the needs of multiple AAs. Investments in funds are allocated to individual AAs based on the underlying projects located in the AAs. In drawing conclusions, we evaluated investment complexity, responsiveness to identified community development needs, and the degree of investment opportunities within the AAs. Activity levels were put into perspective by comparing the dollar level of AA investments to the bank's Tier One capital allocated to each respective AA.

Service Test

We placed the greatest weight on the delivery of financial services and products to geographies and individuals of different income levels through the bank's distribution of branches. Particular focus was placed on serving low- and moderate-income area, including the impact of branch openings and closings. The bank's record of providing community development services received secondary consideration.

Community Contacts

In drawing conclusions relative to the bank's performance in the full-scope AAs, we took into consideration information derived from members of the community. Refer to the market profiles in appendix C for information regarding community contacts performed.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), in determining a national bank's (bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau.

The OCC does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

As a result of these findings, the CRA Performance Evaluation rating was lowered from Outstanding to Satisfactory.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Primary Rating Areas

- State of Ohio
- State of Michigan

State Rating

State of Ohio

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

The major factors that support this rating include:

- Community development lending is very strong and elevates otherwise good lending performance to the excellent level. CD lending is excellent in both the Columbus MSA (Columbus AA) and Cleveland-Elyria-Mentor MSA (Cleveland AA) full-scope AAs.
- The geographic distribution of loans is good. Mortgage lending performance and small loans to business lending performance are both good.
- The borrower distribution of loans is good. Mortgage lending performance is good, and small loans to business lending performance is excellent.
- Qualified investment activity is good overall in Ohio, with excellent performance reflected in the Columbus AA and good performance in the Cleveland AA. Huntington investments are particularly responsive to the affordable housing needs of the AAs.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income levels is good overall. Excellent performance in the Columbus AA was impacted by good performance in the Cleveland AA and generally good performance in the combined limited-scope AAs.
- Huntington's responsiveness to community needs through the provision of CD services is overall excellent in the state, with excellent performance in the Columbus AA and good in the Cleveland AA.

Description of Institution's Operations in Ohio

Ohio is Huntington's most significant rating area, representing 55 percent of deposits and 52 percent of loans reported within the bank's AAs. The bank and holding company are headquartered in Columbus, Ohio. Huntington is one of the largest insured financial institutions in the state, operating 339 offices with deposits totaling \$23 billion, excluding offices and deposits located within the Ohio portions of four multistate MSAs. Huntington

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

offers its full range of residential, consumer, and commercial financial products and services in Ohio.

Huntington has 11 AAs in Ohio with offices located in 10 MSAs plus 22 non-MSA counties throughout the state. These AAs exclude four multistate MSAs that are evaluated separately. Huntington's primary market areas in Ohio are within the Columbus MSA and the Cleveland Elyria-Mentor MSA. Huntington has 77 offices with \$10.3 billion in deposits within the Columbus AA, while 80 offices with \$4.1 billion in deposits are from the Cleveland AA. The bank also has AAs within the Akron, Canton-Massillon, Dayton, Lima, Mansfield, Sandusky, Springfield, and the Toledo MSAs. The 22 non-MSA counties in Ohio are combined to form one AA (Ohio non-MSA). Huntington entered the East Liverpool (Columbiana County, non-MSA) market through the merger with Sky Financial. The Sandusky MSA is served only by a deposit-taking ATM. Please refer to the market profiles for the state of Ohio in appendix C for detailed demographics and other performance context information for the AAs that received full-scope reviews. Refer to appendix A for the detail of counties that comprise the limited-scope AAs.

Scope of Evaluation in Ohio

The Columbus and Cleveland AAs were selected for full-scope reviews, as they represent the bank's most significant markets in Ohio. Collectively, these two AAs represent 63 percent of Huntington's Ohio deposits and 49 percent of the total number of reported loans from Ohio AAs. The remaining AAs in Ohio were evaluated using limited-scope procedures. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

Ohio ratings are based primarily on conclusions reached for performance in the two AAs where we used full-scope procedures. In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local community in the full-scope AAs. In the Cleveland AA, we met with a housing organization, a community action agency, and an economic development office. In the Columbus AA, we met with a housing organization, a religious organization providing social services, and an economic development office. Refer to the market profiles in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Ohio is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Columbus AA and 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.

Huntington's lending activity is good in both the Columbus and Cleveland AAs. Considering market rankings and market shares, lending is generally commensurate with the bank's local deposit presence, especially when considering the large number of lenders operating in these areas. Huntington's deposit market share and rank in both the Columbus and Cleveland AAs are higher than lending market shares and ranks in these AAs. A significantly larger number of lenders compete in the AAs than depository institutions with branches. Many of the competing lenders are either non-depository institutions or depositories institutions that do not operate branches in the AAs. Considering the relative levels of completion in the deposit and lending markets, lending is generally commensurate with the bank's local deposit presence.

Columbus AA

According to June 30, 2011 FDIC deposit market share data, Huntington was ranked first in the Columbus AA in deposits among 54 depository institutions with a 24.2 percent share of the market. According to 2010 peer mortgage data, Huntington achieved a 5.4 percent market share of home purchase loans, ranking sixth of 294 lenders and is equivalent to being in the top two percent of lenders. Collectively, the top five lenders for home purchase loans have 37.2 percent of the market share. The bank achieved a 9.4 percent market share of home improvement loans ranking first among 94 lenders. The bank also achieved an 8.3 percent market share for home refinance loans, ranking third among 368 lenders, placing the bank in the top one percent of lenders. Huntington was ranked third of 86 small business lenders with a 12.6 percent share of the market, ranking in the top three percent of lenders.

Cleveland AA

In the Cleveland AA, June 30, 2011 FDIC deposit market share data shows Huntington was ranked fifth in deposits among 43 depository institutions with an 8.0 percent share of the market. This rank places the bank in the top 11.6 percent of depository institutions. Per 2010 peer mortgage data, Huntington achieved a 2.1 percent market share of home purchase loans, ranking thirteenth among 244 lenders, which is equivalent to being in the top five percent of lenders. Collectively, the top five home purchase lenders have 41.0 percent of the market share. Huntington achieved a 5.87 market share of home improvement loans, ranking sixth among 97 lenders, which is equivalent to being in the top six percent of lenders. Collectively, the top five home improvement lenders have 55.0 percent of the market share. The bank achieved a 3.7 percent market share of home refinance loans, ranking sixth of 310 lenders and is equivalent to being in the top two percent of lenders. Collectively, the top five home refinance lenders have 41.0 percent of market share. Huntington ranked fourth of 87 small business lenders equivalent to being in the top five percent of lenders with 9.2 percent of market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good. This is based on generally good performance in both the Columbus and Cleveland full-scope AAs. The bank did not originate or purchase a sufficient number of small farm loans in the Cleveland AA to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is good. This is based on good performance in the Columbus AA and adequate performance in the Cleveland AA. Refer to Tables 2, 3, 4, and 5 in the Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Columbus AA

The geographic distribution of home purchase loans is good in the Columbus AA. The percentage of loans originated/purchased in low-income areas exceeded the percentage of owner-occupied housing units located in those neighborhoods. In moderate-income geographies, the percentage of loans was well below the corresponding percentage of owner-occupied housing units. Huntington's 2010 home purchase market share in both low-income and moderate-income geographies significantly exceeded its overall home purchase market share for the AA area.

The geographic distribution of home improvement loans is adequate. The percentage of loans originated/purchased in low-income geographies was somewhat near the percentage of owner-occupied housing units located in those neighborhoods. In moderate-income geographies, the percentage of loans was below the corresponding percentage of owner-occupied housing units. In low-income geographies, Huntington's 2010 home improvement market share exceeded its overall share of the market, while in moderate-income geographies the bank's 2010 market share was significantly below its overall share of the market.

The geographic distribution of home refinance loans is good. The percentage of loans in low-income geographies was somewhat near the percentage of owner-occupied housing units located in those neighborhoods. The percentage of loans in moderate-income geographies was well below the corresponding percentage of owner-occupied housing units. Huntington's 2010 home refinance market share in both low-income and moderate-income geographies significantly exceeded its overall home refinance market share for the area. This market share performance further supports the overall good home refinance conclusion.

Cleveland AA

The geographic distribution of home purchase loans is adequate in the Cleveland AA, when considering the bank's market share performance. The percentage of loans originated/purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those neighborhoods. In low-income geographies, the percentage of loans was well below the corresponding percentage of owner-occupied housing units. Huntington's 2010 home purchase market share in both low-income and moderate-income geographies significantly exceeded its overall home purchase market share for the assessment area. This market share performance further supports the overall adequate conclusion.

The geographic distribution of home improvement loans is good. The percentage of loans originated/purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those neighborhoods. The percentage of loans in moderate-income geographies was somewhat near the percentage of owner-occupied housing units located in those parts of the AA. Huntington did not record a market share in low-income geographies in

2010, and its share in the moderate-income geographies was well below its overall home improvement market share for the AA.

The geographic distribution of home refinance loans is adequate, when considering the bank's market share performance. The percentages of loans in both low- and moderate-income geographies was well below the percentage of owner-occupied housing units located in those areas. However, Huntington's 2010 home refinance market share in both low-income and moderate-income geographies significantly exceeded its overall home refinance market share for the AA. This market share performance further supports the overall adequate conclusion.

Small Loans to Businesses

HNB's record of lending to small businesses reflects excellent performance. The geographic distribution of small loans to businesses is excellent in the Columbus AA and good in the Cleveland AA. Refer to Table 6 in the 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.

Columbus AA

The geographic distribution of small loans to businesses is excellent in the Columbus AA, when considering the bank's loan performance to demographics. The percentage of loans in low-income geographies exceeded the percentage of businesses located in those parts of the AA. The percentage of loans in moderate-income geographies was very near the corresponding percentage of businesses located there. Huntington's 2010 small business market share in low-income geographies significantly exceeded its overall small business market share for the AA, while the market share in moderate-income geographies was below its overall share.

Cleveland AA

The geographic distribution of small loans to businesses is good in the Cleveland AA. The percentage of loans in low-income geographies was below the percentage of businesses located in those geographies. The percentage of loans in moderate-income geographies exceeded the corresponding percentage of businesses located there. Huntington's 2010 small business market share in moderate-income geographies areas significantly exceeded its overall small business market share for the AA while its share within low-income areas was generally near its overall share. This market share performance further supports the overall good conclusion.

Small Loans to Farms

Refer to Table 7 in the 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.

Columbus AA

The geographic distribution of small loans to farms is very poor in the Columbus AA, however this is based on a relatively small level of activity compared to other types of loans reported by Huntington and this is not a primary focus of the bank's lending business. There is limited opportunity to lend in the low-income geographies as a very small percentage of farms are located there, and no loans were originated or purchased by Huntington in low-income

geographies during the evaluation period. Conclusions are based primarily on performance in the moderate-income geographies. During the evaluation period, the percentage of Huntington loans originated/purchased in moderate-income geographies was significantly below the percentage of farms located in those parts of the AA. No moderate-income market share was recorded by Huntington in 2010.

Cleveland AA

The volume of Huntington's small loans to farms is too small for meaningful analyses.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in either the Columbus AA or Cleveland AA.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans is good. This is based on good performance in the Columbus AA, and excellent performance in the Cleveland AA. As discussed earlier, in both the Columbus and Cleveland AAs, the bank did not originate or purchase a sufficient number of multifamily loans to perform a meaningful analysis. In addition, the bank did not originate or purchase a sufficient number of small farm loans in the Cleveland AA to perform a meaningful analysis.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good. This is based on good performance in the Columbus and Cleveland AAs. Refer to Tables 8, 9, and 10 in the 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.

Columbus AA

The borrower distribution of home purchase loans is good in the Columbus AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. Huntington's 2010 market share to both low- and moderate-income borrowers was generally near its overall home purchase market share for the AA.

The borrower distribution of home improvement loans is good. While the percentage of loans to low-income borrowers was below the percentage of low-income families in the AA, performance was good considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers was near the percentage of moderate-income families in the AA. Huntington's 2010 home improvement market share to low-income borrowers was generally near its overall market share. Huntington's 2010 market share of moderate-income borrowers was below its overall home improvement market share for the AA.

The borrower distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers was near the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is significantly below the percentage of low-income families in the AA, performance was poor when considering the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 market share of both low-income and moderate-income borrowers exceeded its overall home refinance market share for the AA. This market share performance further supports the overall good conclusion.

Cleveland AA

The borrower distribution of home purchase loans is good in the Cleveland AA. While the percentage of loans to low-income borrowers was below the percentage of low-income families in the AA, performance was good considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. Huntington's 2010 home purchase market share to low-income borrowers was below its overall home purchase market share for the AA. Huntington's 2010 market share of moderate-income borrowers exceeded its overall home purchase market share for the AA.

The borrower distribution of home improvement loans is good. While the percentage of loans to low-income borrowers was below the percentage of low-income families in the AA, performance was good considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. Huntington's 2010 home improvement market share to low-income borrowers was significantly below its overall market share. Huntington's 2010 market share of moderate-income borrowers was generally near its overall home improvement market share for the AA.

The borrower distribution of home refinance loans is good. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers substantially meets the percentage of moderate-income families in the AA. Huntington's 2010 low-income borrower market share significantly exceeded its overall home refinance market share for this AA. Huntington's 2010 market share of moderate-income borrowers exceeded its overall home refinance market share for the AA.

Small Loans to Businesses

The borrower distribution of small loans to businesses is excellent in both the Columbus AA and Cleveland AAs. Refer to Table 11 in the Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Columbus AA

The borrower distribution of small loans to businesses is excellent in the Columbus AA. The percentage of loans to businesses with revenues of \$1 million or less exceeded the

percentage of businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses with revenues of \$1 million or less significantly exceeded its overall small business market share for the AA.

Cleveland AA

The borrower distribution of small loans to businesses is excellent in the Cleveland AA. The percentage of loans to businesses with revenues of \$1 million or less approximated the percentage of businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses with revenues of \$1 million or less exceeded its overall small business market share for the AA.

Small Loans to Farms

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

Columbus AA

The borrower distribution of small loans to farms is good in the Columbus AA. The percentage of loans to farms with revenues of \$1 million or less was generally near the percentage of area farms that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to farms with revenues of \$1 million or less exceeded its overall small farm market share for the AA.

Cleveland AA

The volume of Huntington's small loans to farms is too small for meaningful analyses.

Community Development Lending

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

Community development lending is excellent in both the Columbus and Cleveland AAs, and has a significant positive impact on lending test performance in both full-scope AA.

Columbus AA

Community development lending has a significant positive impact on lending performance in the Columbus AA. During the evaluation period, the bank originated 113 CD loans totaling \$358.4 million representing 34 percent of Tier One Capital allocated to the AA and demonstrating strong leadership and responsiveness to community needs. CD loans reflect a variety of community development purposes including projects to revitalize and stabilize targeted low- and moderate-income neighborhoods and affordable housing for low- and moderate-income persons, including the elderly and those with special needs. These efforts address identified needs, as further discussed in the Columbus AA market profile in appendix C.

As an example, Huntington provided working capital financing totaling \$9.0 million to a locally-based national non-profit organization that is a developer of low-income housing tax credit projects for seniors and families. Huntington also extended additional credit to this organization to help finance a project to develop permanent supportive housing for low-income and homeless veterans. The project is located in a part of Columbus targeted for revitalization where real estate tax exemptions are being offered to encourage new housing and improvements to residential properties. The project was a partnership between the developer, the local housing authority, and the U. S. Department of Veterans Affairs. The loan transaction was complex in that the construction required multiple financing sources. Huntington provided \$3.2 million in a low-income housing tax credit equity investment, a \$1.0 million construction loan, and sponsored a Federal Home Loan Bank Affordable Housing Program grant of \$500,000. In addition, the project was supported by \$1.0 million in city and county grants, Ohio Housing Finance Agency funding, an Ohio Housing Finance Agency Tax Credit Assistance Program grant, and an equity bridge loan from the county. With a total of 50 units, the project offers one - and two-bedroom units, all of which receive Section 8 subsidies. Eight units are restricted to residents earning 35 percent or less of the area median family income, 22 units for residents earning less than 50 percent of the area median income, and 20 units restricted to those earning no greater than 60 percent of the area median income.

Cleveland AA

Community development lending has a significant positive impact on lending performance in the Cleveland AA. During the evaluation period the bank originated 44 CD loans totaling \$96.0 million, representing 23 percent of Tier One Capital allocated to the AA. CD lending demonstrates strong responsiveness to community needs. Approximately 55 percent of CD loans supported revitalization and stabilization projects in the AA, which is an identified need, as discussed in the Cleveland AA market profile in appendix C. For example, Huntington provided a term loan totaling \$16.3 million to finance expansion, equipment, improvements, and working capital needs of a dairy facility located in a low-income geography. This allowed the facility to double its capacity and create 60 new jobs. The project received other funding sources including new markets tax credits, Small Business Administration funding, and city incentives to retain the business in the area. Additionally, Huntington originated CD loans that supported organizations that provide services to low- and moderate-income individuals and families, loans promoting economic development, and loans that support affordable housing projects and initiatives, which are also, identified community needs.

Other Ohio CD Loans

Huntington also made 26 CD loans totaling \$47.7 million in Ohio that did not benefit any particular AA, referred to as "OH Statewide" on Table 1. The loans are primarily for affordable housing purposes, with others made to support economic development, neighborhood revitalization and stabilization, and community service initiatives. As the bank has adequately addressed the CD needs of its AAs in Ohio, we also considered the impact of these out-of-area CD loans.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Considering the size of the AAs and volume of overall lending performed, the activity under

flexible programs has a positive impact on lending performance in the Columbus and Cleveland AAs.

Huntington's Community Access Mortgage loan program assists borrowers refinancing or purchasing properties in low- and moderate-income geographies. The program allows for higher loan to home value ratio levels with no mortgage insurance requirement, and no interest rate adjustment is necessary for lower credit scores. A total of 339 loans were made under this program in the Columbus AA and 59 loans were made in the Cleveland AA during the evaluation period.

Huntington also participates in a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, nearly 2,400 loans were made to low- or moderate-income borrowers and/or to borrowers located in low- or moderate-income parts of the Columbus AA, while more than 1,700 were made in the Cleveland AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Mansfield AA is not inconsistent with the bank's Outstanding performance under the lending test in Ohio. Performance in each of the other limited scope AAs reflects weaker performance. Weaker performance is attributed to relatively lower levels of CD lending in the Akron, Canton, Lima, Springfield, and Toledo AAs. Regardless, CD lending performance is still considered positive in the Akron, Canton, Lima, and Toledo AAs, while CD lending has a neutral impact in the Springfield AA. The Dayton AA reflects weaker geographic distribution performance. The Ohio Non-MSA AA reflects weaker geographic distribution and CD lending levels, although CD lending is considered positive. The Sandusky AA reflects weaker geographic distribution, borrower distribution, and CD lending performance. The weaker performance in these AAs does not materially affect the lending test rating for Ohio, as performance is considered good in all areas except the Sandusky and Ohio Non-MSA AAs where performance is adequate. Refer to the Tables 1 through 13 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Ohio is rated "High Satisfactory".

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Columbus AA is excellent, and good in the Cleveland AA. Refer to Table 14 in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Columbus AA

During the evaluation period Huntington made a total of 240 qualified investments totaling \$82.2 million, or eight percent of allocated Tier One Capital, comprised of low-income housing tax credit funds, a new markets tax credit fund, mortgage-backed securities, and contributions

to local organizations to support community development initiatives. While the level of investments is good, Huntington's high degree of responsiveness to community needs through individual projects elevates the bank's performance to the excellent level. As further described in the Columbus AA market profile in appendix C, affordable housing is an identified need of the local area.

The substantial majority of investments are in the form of low-income housing tax credit funds, which directly address the affordable housing needs of the AA. This includes \$16.9 million in 16 Ohio Equity Fund Limited Partnership funds administered by the Ohio Capital Corporation for Housing. Investments totaling \$56.6 million were also made in 19 single-investor low-income housing tax credit funds supporting specific local affordable housing projects involving nearly 1,600 housing units. Huntington is the sole investor in these 19 funds and has direct involvement in the financing plans for the projects. Huntington also invested \$5.1 million in additional multi-investor low-income housing tax credit funds.

An investment in a new markets tax credit project is an example of Huntington's leadership and involvement in local projects. The project, done in conjunction with a local affordable housing organization, involves the phased construction or rehabilitation of over 700 affordable single-family homes over a seven year period. This includes 500 homes for acquisition and rehabilitation through the U.S. Department of Housing and Urban Development's Asset Control Area (ACA) program. ACA provides for nonprofit organizations to acquire, rehabilitate, and sell Federal Housing Administration repossessed homes. The project covers 31 census tracts, primarily consisting of highly distressed communities, in addition to areas with high foreclosure rates. The \$9.5 million financing package for the project is complex and uses a new markets tax credit allocation made up of nine different facilities from six different financial institutions. Huntington provided \$3.5 million to the transaction, which consisted of a \$1.5 million equity investment and \$2 million in leveraged and direct loans. Huntington took a leadership role in providing the project with 50 percent of the equity, and is the primary lender. Huntington also took the lead role in structuring the \$6.5 million upper tier loan fund, and also serves in an asset management role for the funding and monitoring of the project.

Other investments included \$537 thousand in mortgage-backed securities backed by mortgages to low- and moderate-income borrowers from the AA. Furthermore, Huntington made contributions to 60 community development organizations totaling \$3.1 million that addressed affordable housing, economic development, neighborhood stabilization and revitalization efforts, as well as support programs for low- and moderate-income individuals. Prior period investments that remain outstanding total \$181 thousand in the form of mortgage-backed securities and low-income housing tax credit funds, which continue to support the affordable housing needs of the AA.

Cleveland AA

During the evaluation period, Huntington made investments totaling \$30.9 million, or eight percent of allocated Tier One Capital, in the Cleveland AA. Investments were made in low-income housing tax credit, new market tax credit, and historic tax credit funds, a mortgage-backed security backed by mortgages to low- and moderate-income borrowers from the AA, and cash contributions to local community organizations for community development purposes. The level of investments is commensurate with the size of bank operations in the AA, and is considered good. Responsiveness to the identified needs of the AA, as further

discussed in the Cleveland AA market profile in appendix C, is good, with affordable housing needs especially addressed.

Huntington invested \$19.6 million in low-income housing tax credit funds. This includes \$7.5 million in 12 Ohio Equity Fund Limited Partnership funds administered by the Ohio Capital Corporation for Housing and support affordable housing projects within the AA. Investments totaling \$11.7 million were also made in five single-investor low-income housing tax credit funds supporting affordable housing projects involving 360 housing units, with additional projects planned through one of the funds. Huntington is the sole investor in these five funds and has direct involvement in the financing plans for the projects. Investments were made in two historic tax credit funds totaling \$1.5 million and three new markets tax credit funds totaling \$8.6 million that support revitalization projects in low- and moderate-income parts of the AA. Furthermore, Huntington made contributions to 58 community development organizations totaling \$1.1 million that primarily addressed educational, housing, and food for low- and moderate-income families and children. Donations also supported economic and neighborhood stabilization and revitalization efforts. Prior period investments that remain outstanding total \$535 thousand and include two single-investor low-income housing tax credit funds and a new markets tax credit fund. These investments continue to support the affordable housing and revitalization needs of the AA.

Other Ohio Investments

Huntington also made qualified investments totaling \$18.9 million for affordable housing purposes in the greater Ohio statewide area that did not benefit any particular AA. These are reflected as "OH Statewide" on Table 14. The investments are in low-income housing tax credit funds, including Ohio Equity Fund Limited Partnership funds, and single-investor funds where Huntington is the only investor. These investments further demonstrate the bank's commitment to community development initiatives. As the bank's performance is at least adequate in its Ohio AAs, we also considered the impact of these investments when drawing conclusions for Ohio.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Canton, Springfield, and Toledo AAs is not inconsistent with and further supports the bank's overall High Satisfactory performance under the investment test in Ohio. In the Akron, Dayton, Lima, Mansfield, and Ohio Non-MSA AAs, the bank's performance is stronger than the bank's overall performance in the state, due to a higher level of qualified investments. In the Sandusky AA, the bank's performance is weaker than the bank's overall performance in the state due to lower relative levels of qualified investments. The stronger and weaker performance did not materially affect the overall investment test rating for the state. Refer to 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 Ohio is rated "High Satisfactory" when considering performance in both full-scope and limited-scope areas. Based on full-scope reviews, the bank's performance in the Columbus AA is excellent and good in the Cleveland AA. Performance in the combined limited-scope areas further supported the "High Satisfactory" rating.

Retail Banking Services

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

Columbus AA

Huntington's branches are readily accessible to geographies and individuals of different income levels. Systems for delivering retail banking services are excellent. The bank operates 77 offices in the area. The percentage of offices located in low-income census tracts exceeded the percentage of the population living in those areas, while the percentage of offices in moderate-income census tracts approximated the portion of the population in those parts of the AA. Furthermore, several of the bank's branches in middle- and upper-income census tracts are within one mile of 77 percent of the AAs low-income tracts and 71 percent of moderate-income tracts. These branches provide greater accessibility to low- and moderate-income areas. Overall, the bank's branch activity improved the availability of Huntington products and services in the AA, particularly in moderate-income geographies. Huntington expanded its branch network in the area when Sky Financial was acquired. In addition, 19 offices were opened and six were closed. One branch was closed in the low-income geography. In moderate-income geographies seven branches were opened and one branch was closed. Branch closings in the AA were due to reductions in branch activity.

Branch office hours and the level of services available do not vary in a way that inconveniences any portions of the AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, many branches offer Saturday banking hours, and Sunday hours are available at branches located within grocery stores. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 202 full-service ATMs within the AA, including many in off-premise locations such as grocery stores.

Cleveland AA

Huntington's branches are accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are good. The bank operates 80 offices in the AA. The percentage of offices located in low-income census tracts was lower than the percentage of the population living in those areas, while the percentage of offices in

moderate-income census tracts approximated the portion of the population in those geographies. Branch openings and closings did not adversely affect the accessibility of products and services in low- and or moderate income geographies, or to low-and or moderate income individuals. Huntington expanded its branch network in the area when Sky Financial was acquired. In addition, 27 offices were opened and 16 were closed. One branch was closed in the low-income geography, while five branches were opened and five were closed in the moderate-income geographies. Branch closings in the AA were due to reductions in branch activity.

Branch office hours and the level of services available do not vary in ways that inconveniences any portions of the AA, including low-and moderate-income geographies. In addition to offering extended Monday through Friday banking hours, many branches also offer Saturday and Sunday hours. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 179 full-service ATMs within the AA, including many in off-premise locations such as grocery stores.

Community Development Services

Huntington's response to addressing community needs through the provision of CD services is excellent in the Columbus AA and good in the Cleveland AA.

Columbus AA

Huntington has an excellent record of providing CD services to the Columbus AA. Officers and employees used their financial expertise to provide credit counseling, first-time homebuyer seminars, account openings, financial education, members of director boards and loan review committees. During the evaluation period, Huntington employees documented 5,278 hours of service to various qualified community development organizations such as: Habitat for Humanity, The Community Development Collaborative, Children's Hunger Alliance, and the Ohio Commission on Personal Finance. Huntington has been responsive to identified community needs, including affordable housing, economic development, support for small businesses, and financial literacy. Several examples are summarized below.

- Technical assistance was provided to a nonprofit organization to prepare an Affordable Housing Program grant application to the Federal Home Loan Bank. The application resulted in a grant to support an affordable housing program.
- Huntington created a Home Saver Solutions team to inform distressed homeowners of options available to help keep their homes. Six outreach events were held in this AA.
- In connection with a local housing organization, 10 Huntington employees provided their technical expertise for homebuyer seminars, financial planning, and home foreclosure prevention workshops.
- Employees have served as members of a Community Development Financial Institution's board, loan review, and loan advisory committees. The organization provides micro loans

to very small businesses, as well as other services such as financial literacy and small business development training.

- Employees served on a local organization's board and provided financial guidance and oversight such as budget analysis, grant submissions, financial management, and homeowner counseling.
- Huntington employees conducted financial education classes to low-income families in transition in connection with a local organization's efforts to help stabilize homeless families.
- Seventeen Huntington employees participated in the "Huntington Kids Club" at three elementary schools in underserved areas where the majority of students are from low- and moderate-income families. The program provides financial education such as budgeting and savings, and in the form of hands-on experience as tellers and customer service representatives.

Cleveland AA

Huntington has a good record of providing CD services relative to its presence in the AA. Officers and employees used their financial expertise when serving on community organization boards and committees, providing financial education, and working with affordable housing initiatives. During the evaluation period, Huntington employees documented 2,638 hours of service to qualified community development organizations in the AA such as: The Center for Families and Children, East End Neighborhood House, and Habitat for Humanity. Huntington has been responsive to community needs, including needs for affordable housing, economic development and job creation, and financial literacy. Several examples are summarized below.

- Technical assistance was provided to a nonprofit organization to prepare an Affordable Housing Program grant application to the Federal Home Loan Bank.
- Huntington employees served on the board, the loan review committee, the finance committee of an affordable housing organization, and provided clients with homebuyer education and foreclosure prevention counseling.
- Employees served on the board, loan review committee, and marketing committee for an economic development organization with a mission to support economic growth and jobs creation.
- Huntington created a Home Saver Solutions team to inform distressed homeowners of options available to help keep their homes. Three outreach events were held in this AA.
- The bank delivered financial education programs that served primarily low- and moderate-income audiences. Employees helped a local organization in the creation and delivery of customized financial education workshops to over 700 young adults.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Akron, Canton, and Ohio Non-MSA AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the service test in Ohio. In the Lima and Springfield AAs, the bank's performance is stronger than the bank's overall performance in the state, as branches are readily accessible to geographies and individuals of different income levels. In the Dayton, Mansfield, Sandusky, and Toledo AAs the bank's performance is weaker than the bank's overall performance in the state due to weaker branch distribution. The combined performance evidenced in the limited-scope areas further supports the "High Satisfactory" performance in the state. Refer to Table 15 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

State Rating

State of Michigan

CRA Rating for Michigan²:	Outstanding
The lending test is rated:	<u>Outstanding</u>
The investment test is rated:	<u>High Satisfactory</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Community development lending is very strong and elevates otherwise good lending performance to the excellent level. CD lending is excellent in all three full-scope AAs in Michigan.
- The geographic distribution of loans is good overall. Mortgage lending performance is good, and small loans to business lending performance is excellent.
- The borrower distribution of loans is good. Mortgage lending performance and small loans to business lending performance are both good.
- Qualified investment activity is good overall, with excellent performance in the Detroit AA, adequate performance in the Warren-Troy AA, and excellent for the Grand Rapids AA. Huntington investments are particularly responsive to the affordable housing needs of the AAs.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income levels is good.
- The provision of CD services overall is good, with good performance in the Warren-Troy AA and excellent in the Detroit and Grand Rapids AAs.

Description of Institution's Operations in Michigan

Huntington has 133 offices within the state of Michigan, offering its full range of residential, consumer, and commercial financial products and services. Michigan is Huntington's second largest rating area based on deposits and reported loans. Deposits totaling \$7.1 billion within the state represent approximately 17 percent of the bank's total deposits, while 19 percent of Huntington's reported AA loans are from Michigan. While Huntington is one of the larger financial institutions operating in Michigan based on deposits, its overall state-wide deposit market share is less than five percent.

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

Huntington has ten AAs in Michigan. Offices are located in eight MSAs plus 15 non-MSA counties within Michigan's Lower Peninsula. Huntington's primary market areas in Michigan are within the Detroit-Warren-Livonia MSA and the Grand Rapids-Wyoming MSA. Fifty-five offices with deposits totaling \$3.9 billion are located within the Detroit-Warren-Livonia MSA while 23 offices with deposits of \$1.4 billion are located in the Grand Rapids AA. Two AAs are within the Detroit-Warren-Livonia MSA, which has been divided into two Metropolitan Divisions. Performance within the Warren-Troy AA (within the Warren-Farmington Hills-Troy Metropolitan Division) and the Detroit AA (within the Detroit-Livonia-Dearborn Metropolitan Division) are analyzed separately. The bank also has AAs in Cass County within the South Bend-Mishawaka, IN-MI multistate MSA, the Holland-Grand Haven MSA, the Kalamazoo-Portage MSA, the Monroe MSA, the Muskegon-Norton Shores MSA, and the Niles-Benton Harbor MSA. The 15 non-MSA counties are combined to form a single AA (non-MSA Michigan AA.) Huntington entered the Monroe MSA and Lenawee County (non-MSA) markets through the merger with Sky Financial. Huntington expanded its presence in the Warren-Troy AA when it purchased six former Warren Bank offices from the FDIC.

Please refer to the market profiles for the state of Michigan in appendix C for detailed demographics and other performance context information for the AAs that received full-scope reviews. Refer to appendix A for the detail of counties that comprise the limited-scope AAs.

Scope of Evaluation in Michigan

The Warren-Troy AA, Detroit AA, and the Grand Rapids AA were selected for full-scope reviews, as these AAs are within the bank's major markets in Michigan. Collectively, these three AAs represent 74 percent of Huntington's Michigan deposits and 52 percent of loans reported in Michigan AAs. While the Detroit AA represents a small portion of Huntington's operations in Michigan, it was selected for a full-scope review as this area has the greatest concentration of low- and moderate-income population and geographies within the Detroit-Warren-Livonia MSA. The remaining AAs in Michigan were evaluated using limited-scope procedures. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

Michigan ratings are based primarily on conclusions reached for performance in the three AAs where we used full-scope procedures. In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local community in the full-scope AAs. In the Detroit AA, we met with a housing coalition, a fair housing organization, and an economic development organization. In the Warren-Troy AA, we met with a human services agency and a housing organization. In the Grand Rapids AA, we met with an organization focused on neighborhood revitalization and one that provides affordable housing and social services. Refer to the market profiles in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Michigan is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Detroit, Warren-Troy, and Grand Rapids AAs is excellent.

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.

Huntington's lending activity is good in the Warren-Troy, Detroit, and Grand Rapids AAs. Considering market rankings and market shares, lending is generally commensurate with the bank's local deposit presence, especially when considering the large number of lenders operating in these areas. Huntington's deposit market share and rank in the Warren-Troy, Detroit, and Grand Rapids AAs are higher than lending market shares and ranks in these AAs. A significantly larger number of lenders compete in the AAs than depository institutions with branches. Many of the competing lenders are either non-depository institutions or depository institutions that do not operate branches in the AAs. Considering the relative levels of completion in the deposit and lending markets, lending is generally commensurate with the bank's local deposit presence.

Warren-Troy AA

June 30, 2011 FDIC deposit information reflects that Huntington ranked sixth in deposits among 38 depository institutions with a 7.2 percent share of the market. This rank placed the bank in the top 15 percent of depository institutions in the AA. According to 2010 peer HMDA data, Huntington is ranked fifteenth in overall home mortgage lending among more than 400 mortgage lenders. Huntington achieved a 1.95 percent market share in home purchase loans, ranking 15th among 286 lenders and equivalent to being in the top five percent of lenders. Collectively, the top five home purchase lenders have 41 percent of the market share. Huntington achieved a 1.23 percent market share in home improvement loans, ranking 22nd among 97 lenders, which is equivalent to being in the top 22 percent of lenders. Collectively, the top five home improvement lenders have 37 percent of the AA market share. The bank achieved 1.87 percent of market share in home refinance loans ranking 13th of 333 lenders, which is equivalent to being in the top four percent of lenders. Collectively, the top five home refinance lenders have 40 percent of the total market share. According to 2010 peer small business data, Huntington was ranked eighth of 93 business lenders with a 3.6 percent market share. This rank placed the bank in the top nine percent of lenders. Collectively, the top five small business lenders have 65 percent of the total market share.

Detroit AA

Within the Detroit AA, June 30, 2011 FDIC deposit information reflects that Huntington ranked ninth in deposits among 28 depository institutions with a 0.8 percent share of the market. This rank placed the bank in the top 32 percent of depository institutions in the AA. According to 2010 peer HMDA data, Huntington achieved a 0.68 percent market share in home purchase loans ranking 29th among 226 institutions, which is equivalent to being in the top 13 percent of

lenders. Collectively, the top five home purchase lenders have 43 percent of the total market share. The bank achieved a 0.25 percent market share for home improvement loans, ranking 44th among 84 lenders, which is equivalent to being in the top 52 percent of lenders. Collectively, the top five home improvement lenders have 37 percent of market share. Huntington achieved a 0.56 percent market share in home refinance loans, ranking 28th of 264 lenders. This rank placed the bank in the top 11 percent of lenders. Collectively, the top five home refinance lenders have 42 percent of the total market share. According to 2010 peer small business data, Huntington is ranked 13th of 71 business lenders with a 1.9 percent market share, placing the bank in the top 18 percent of lenders. Collectively, the top five small business lenders have 62 percent of market share.

Grand Rapids AA

June 30, 2011 FDIC deposit information reflects that Huntington ranked third in deposits among 27 depository institutions with a 10.8 percent share of the market. This rank placed the bank in the top 11 percent of depository institutions in the AA. According to 2010 peer HMDA data, Huntington is ranked seventh in overall home mortgage lending among more than 275 mortgage lenders. With a 3.0 percent market share, Huntington ranked ninth of 176 home purchase lenders, placing the bank in the top five percent of lenders. Collectively, the top five home purchase lenders have 45 percent of the total market share. With a 1.9 market share, the bank ranked 15th out of 64 home improvement lenders, placing the bank in the top 23 percent of lenders. Collectively, the top five home improvement lenders have 48 percent of the total market share. With a 4.0 market share, the bank ranked sixth out of 242 home refinance lenders, placing the bank in the top two percent of lenders. Collectively, the top five home refinance lenders have 47 percent of market share. According to 2010 peer small business data, Huntington is ranked fourth of 54 business lenders with an 8.5 percent share of the market. This rank placed the bank in the top seven percent of lenders. Collectively the top five small business lenders have 54 percent of the market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good. This is based on excellent performance in the Warren-Troy AA and good performance in the Detroit and Grand Rapids AAs. The bank did not originate or purchase a sufficient number of small loans to farms in any of the AAs to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is good. This conclusion is based on good performance in the Warren-Troy and Grand Rapids AAs and adequate performance in the Detroit AA. Refer to Tables 2, 3, 4, and 5 in the Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Warren-Troy AA

When drawing geographic distribution conclusions for this AA, we considered that there are limited opportunities for mortgage lending in low-income geographies, as less than one percent of owner-occupied housing units are located in those census tracts. Therefore, conclusions are based primarily on lending in moderate-income tracts.

The geographic distribution of home purchase loans is excellent in the Warren-Troy AA. The percentage of loans in low-income geographies was well below the percentage of owner-occupied housing units located in those neighborhoods. The percentage of loans originated/purchased in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 home purchase market share in moderate-income geographies significantly exceeded its overall home purchase market share for the AA. The bank did not achieve a market share in low-income geographies in 2010.

The geographic distribution of home improvement loans is good. Despite limited opportunities, the percentage of loans in low-income geographies was below the percentage of owner-occupied housing units located in those neighborhoods, and was considered adequate. The percentage of loans originated/purchased in moderate-income geographies was near the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 home improvement market share in moderate-income geographies was lower than its overall share of the market. The bank did not achieve market share in low-income geographies in 2010.

The geographic distribution of home refinance loans is good, when considering the bank's market share performance. The percentage of loans in low-income geographies was well below the percentage of owner-occupied housing units located in those neighborhoods. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 home refinance market share in low- and moderate-income geographies significantly exceeded its overall home refinance market share for the AA.

Detroit AA

The geographic distribution of home purchase loans is adequate in the Detroit AA. The percentages of loans originated/purchased in both low- income and moderate-income geographies was below the corresponding percentages of owner-occupied housing units located in those neighborhoods. While Huntington's 2010 home purchase market shares in both low-income and moderate-income geographies significantly exceeded its overall home purchase market share for the area, the significance of market share analyses is limited due to Huntington's very small overall share of the market.

The geographic distribution of home improvement loans is excellent. The percentages of loans originated/purchased in both low-income and moderate-income areas significantly exceeded the corresponding percentages of owner-occupied housing units located in those neighborhoods. Market share analyses are not meaningful for this loan type in this AA, as the overall market share is less than one percent.

The geographic distribution of home refinance loans is adequate. The percentage of loans in low-income geographies was somewhat near the percentage of owner-occupied housing units located in those areas. The percentage of loans in low-income geographies was well below the corresponding percentage of owner-occupied housing units. While Huntington's 2010 home refinance market shares in both low-income and moderate-income geographies significantly exceeded its overall home refinance market share for the area, the significance of market share analyses is limited due to Huntington's very small share of the market.

Grand Rapids AA

When drawing geographic distribution conclusions for this AA, we considered that there are limited opportunities for mortgage lending in low-income geographies, as there are only one percent of owner-occupied housing units located in those census tracts. Therefore, conclusions are based primarily on lending in moderate-income tracts.

The geographic distribution of home purchase loans is excellent in the Grand Rapids AA. The percentage of loans originated/purchased in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units located in those neighborhoods. The percentage of loans in low-income geographies was below the percentage of owner-occupied housing units in those areas. Huntington's 2010 home purchase market share in both low-income and moderate-income geographies significantly exceeded its overall home purchase market share for the AA.

The geographic distribution of home improvement loans is good. The percentage of loans originated/purchased in moderate-income geographies substantially meets the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 home improvement market share in moderate-income geographies significantly exceeded its overall home improvement market share for the AA. No loans were originated/purchased in low-income tracts during the evaluation period.

The geographic distribution of home refinance loans is good, when considering the bank's market share performance in moderate-income geographies. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied housing units located in those areas. The percentage of loans in low-income geographies was well below the percentage of owner-occupied housing units in those areas. Huntington's 2010 home refinance market share in moderate-income areas significantly exceeded its overall home refinance market share for the AA. In 2010, Huntington did not achieve a market share for refinance loans in low-income geographies.

Small Loans to Businesses

The geographic distribution of small loans to businesses is excellent. This conclusion is based on excellent performance in the Warren-Troy and Detroit AAs and good performance in the Grand Rapids AA. Refer to Table 6 in the 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.

Warren-Troy AA

The geographic distribution of small loans to businesses is excellent in the Warren-Troy AA. The percentages of loans in both low-income and moderate-income geographies significantly exceeded the percentages of businesses located in the corresponding geographies. Huntington's 2010 small business market shares in low-income and moderate-income geographies significantly exceeded its overall small business market share for the AA.

Detroit AA

The geographic distribution of small loans to businesses is excellent in the Detroit AA. The percentages of loans in both low-income and moderate-income areas significantly exceeded

the percentages of businesses located in the corresponding geographies. Huntington's 2010 small business market shares in low-income and moderate-income areas significantly exceeded its overall small business market share for the AA.

Grand Rapids AA

The geographic distribution of small loans to businesses is good in the Grand Rapids AA. The percentage of loans in low-income geographies significantly exceeded the percentage of businesses located in these geographies. The percentage of loans in moderate-income geographies was below the corresponding percentage of businesses located there. Huntington's 2010 small business market share in low-income geographies exceeded its overall small business market share for the area while its share within moderate-income geographies was lower than its overall market share.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps within the Troy-Warren, Detroit, or Grand Rapids AAs.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans is good. This is based on good performance in the Warren-Troy, Detroit, and Grand Rapids full-scope AAs. As stated earlier, the bank did not originate or purchase a sufficient number of small loans to farms in any of the AAs to perform a meaningful analysis.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good. This is based on excellent performance in the Warren-Troy AA, adequate performance in the Detroit AA, and good performance in the Grand Rapids AA. Refer to Tables 8, 9, and 10 in the 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.

Warren-Troy AA

The borrower distribution of home purchase loans is excellent in the Warren-Troy AA. The percentages of loans to low-income and moderate-income borrowers significantly exceeded the percentages of low-income and moderate-income families in the AA. Huntington's 2010 market share of low-income borrowers significantly exceeded its overall home purchase market share for the area while the moderate-income share was near its overall share.

The borrower distribution of home improvement loans is excellent. While the percentage of loans to low-income borrowers was somewhat below the percentage of low-income families in the AA, performance was excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. Huntington's 2010 home improvement market share to low-income

borrowers was well below its overall market share. Huntington's 2010 market share of moderate-income borrowers was near its overall home improvement market share for the area.

The borrower distribution of home refinance loans is excellent. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was somewhat lower than the percentage of low-income families in the AA, performance was excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 market shares of both low-income and moderate-income borrowers significantly exceeded its overall home refinance market share for the AA.

Detroit AA

The borrower distribution of home purchase loans is good in the Detroit AA. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Market share analyses are not meaningful for this loan type in this AA, as the overall market share is less than one percent.

The borrower distribution of home improvement loans is good. While the percentage of loans to low-income borrowers was near the percentage of low-income families in the AA, performance is excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers was below the percentage of moderate-income families in the AA. Market share analyses are not meaningful for this loan type in this AA, as the overall market share is less than one percent.

The borrower distribution of home refinance loans is adequate. The percentage of loans to moderate-income borrowers was below the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was significantly below the percentage of low-income families in the AA, performance was poor when considering the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. Market share analyses are not meaningful for this loan type in this AA, as the overall market share is less than one percent.

Grand Rapids AA

The borrower distribution of home purchase loans is excellent in the Grand Rapids AA, when considering the bank's loan performance to demographics. While the percentage of loans to low-income borrowers was near the percentage of low-income families in the AA, performance was excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. Huntington's 2010 home purchase market share to low-income borrowers was well below its overall home purchase market share for the area. Huntington's 2010 market share of moderate-income borrowers was near its overall home purchase market share for the area.

The borrower distribution of home improvement loans is excellent. While the percentage of loans to low-income borrowers was somewhat near the percentage of low-income families in the AA, performance was excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. Huntington's 2010 home improvement market share to low-income borrowers significantly exceeded its overall market share. Huntington's 2010 market share of moderate-income borrowers was well below its overall home improvement market share for the AA.

The borrower distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 low-income and moderate-income borrower market shares were near its overall home refinance market share for this AA.

Small Loans to Businesses

The borrower distribution of small loans to businesses is good. This conclusion is based on good performance in each of the Warren-Troy, Detroit, and Grand Rapids AAs. Refer to Table 11 in the Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Warren-Troy AA

The borrower distribution of small loans to businesses is good in the Warren-Troy AA, when considering the bank's loan performance to demographics. The percentage of loans to businesses with revenues of \$1 million or less is generally near the percentage of area businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses with revenues of \$1 million or less significantly exceeded its overall small business market share for the area.

Detroit AA

The borrower distribution of small loans to businesses is good in the Detroit AA, when considering the bank's loan performance to demographics. The percentage of loans to businesses with revenues of \$1 million or less near the percentage of area businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses with revenues of \$1 million or less significantly exceeded its overall small business market share for the area.

Grand Rapids AA

The borrower distribution of small loans to businesses is good in the Grand Rapids AA, when considering the bank's loan performance to demographics. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of area businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses with revenues of \$1 million or less significantly exceeded its overall small business market share for the area.

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

Community development lending is excellent in the Warren-Troy, Detroit, and Grand Rapids AAs, and had a significant positive impact on lending test performance in each of these full scope areas.

Warren-Troy AA

Community development lending had a significant positive impact on lending performance in the Warren-Troy AA. During the evaluation period the bank originated 22 CD loans totaling \$86.5 million, representing 23 percent of Tier One Capital allocated to the AA. Responsiveness to community needs, as further discussed in the Warren-Troy market profile in appendix C, is excellent. A majority of CD loans are to organizations and entities that provide services to low- and moderate-income individuals and families. For example, Huntington provided ongoing financing totaling \$33.0 million to support a community action agency that focuses on providing social services to low- and moderate-income individuals. Huntington also provided \$27.0 million in financing for building demolition and construction as part of efforts to stabilize industrial properties within a state sponsored Renaissance Zone located in a moderate-income geography. Furthermore, Huntington extended nearly \$1.0 million to finance a low-income housing tax credit project for the construction of 10 single family homes on scattered sites in a low-income part of Pontiac.

Detroit AA

Community development lending had a significant positive impact on lending performance in the Detroit AA. During the evaluation period the bank originated 19 CD loans totaling \$33.8 million, representing 121 percent of Tier One Capital allocated to the AA. Responsiveness of CD loans is considered excellent. A significant majority of the CD loans supported organizations and entities that provide services to low- and moderate-income individuals and families. Huntington also placed emphasis on addressing the need for affordable housing in the AA, which is an identified need. For example, Huntington provided a \$9.0 million construction loan to two faith-based nonprofit organizations to support a comprehensive redevelopment plan in a low-income area of Detroit. The project includes the acquisition and redevelopment of an old manufacturing facility and converting it into an 80-unit affordable assisted living complex for seniors. Sixty-six of the units have Section 8 vouchers, with eight units targeted to senior residents earning up to 30 percent of the area's median family income, 37 units targeted to those with income no greater than 40 percent of the median income, 30 units targeted to those with income up to 50 percent of the median income, and the remaining five units rented at market rate. This was a complex transaction involving multiple funding sources. In addition to Huntington's construction loan, the borrowers received \$5.2 million in loans from the Michigan State Housing Development Authority, the City of Detroit Neighborhood Fund, the City of Detroit HOME program, and the Wayne County HOME program. In addition, the project was supported through \$650,000 Brownfield Tax Credit Equity, and \$11.0 million in low-income housing tax credits.

Grand Rapids AA

Community development lending had a significant positive impact on lending performance in the Grand Rapids AA. During the evaluation period the bank originated 31 CD loans totaling \$39.3 million, representing 28 percent of Tier One Capital allocated to the AA. CD lending was very responsive to community needs as a majority of loans supported affordable housing or services to low- and moderate-income individuals and families, which are identified community needs. For example, Huntington provided a \$4.4 million construction loan to a large nonprofit affordable housing developer to finance the acquisition and renovation of a 60-unit affordable housing complex for senior residents located in a low-income geography. The project involved multiple financing sources including the Michigan State Housing Development Authority, the City of Grand Rapids, and \$12.5 million of low-income housing tax credits.

Other Michigan CD Loans

Huntington also made 19 CD loans totaling \$33.3 million in the greater Michigan statewide area that did not benefit any particular AA, referred to as “MI Statewide” on Table 1. The loans support affordable housing, economic development, revitalization and stabilization, and community service initiatives. As the bank has adequately addressed the CD needs of its AAs in Michigan, we also considered the impact of these out-of-area CD loans.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Considering the size of the AAs and volume of overall lending performed, the activity under flexible programs has a positive impact on lending performance in the Grand Rapids AA and a neutral impact in both the Warren-Troy and Detroit AAs.

Huntington’s Community Access Mortgage loan program assists borrowers refinancing or purchasing properties in low- and moderate-income geographies. The program allows for higher loan to home value ratio levels with no mortgage insurance requirement, and no interest rate adjustment is necessary for lower credit scores. A total of 22 loans were made under this program in the Grand Rapids, Warren-Troy, and Detroit AAs combined during the evaluation period.

Huntington also participates in a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, over 550 loans were made to low- or moderate income borrowers and/or to borrowers located in low- or moderate-income parts of the Grand Rapids AA. Less than 50 were made in the Warren-Troy and Detroit AAs in this same period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the lending test in the Cass County, Holland, Kalamazoo, Monroe, and Muskegon AAs is not inconsistent with the bank’s overall Outstanding performance under the lending test in Michigan. Performance in each of the other limited scope AAs reflected weaker performance. The Niles and Michigan Non-MSA AAs reflected weaker geographic distribution and CD lending levels, although CD lending is

considered positive in the Non-MSA AA. Performance in the limited-scope areas did not impact the overall lending test rating in the state. Refer to the Tables 1 through 13 in the state of Michigan of section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Michigan is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Detroit and Grand Rapids AAs is excellent, and adequate in the Warren-Troy AA. Refer to Table 14 in the state of Michigan section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Warren-Troy AA

During the evaluation period, Huntington made 40 investments totaling \$20.2 million, or six percent of allocated Tier One Capital, in the Warren-Troy AA. These investments were comprised of two mortgage-backed securities, investment in seven low-income housing tax credit funds, and cash contributions. Considering the bank's size of operations in this AA, the level of investments is adequate.

The bank exhibited adequate responsiveness to the identified needs in the AA. Mortgage-backed security investments totaled \$9.9 million and are backed primarily by mortgage loans to low- and moderate-income borrowers in the AA or borrowers located in low- or moderate-income neighborhoods. Investments in low-income housing tax credit funds totaled \$1.0 million and include four Great Lakes Capital Fund Limited Partnership funds. A total of \$9.2 million was invested in three single-investor low-income housing tax credit funds supporting specific projects in the AA. Huntington is the sole investor in these funds and had direct involvement in the financing plans for the projects. All these investments supported the affordable housing needs of the AA. Furthermore, Huntington made contributions to 14 community development organizations totaling approximately \$81 thousand primarily for supportive services for low- and moderate-income families. Prior period investments that remain outstanding total \$1.8 million and are comprised of a mortgage-backed security backed primarily by mortgages to low- and moderate-income borrowers from the AA, and investments in a low-income housing tax credit fund, both of which continue to support the affordable housing needs of the AA.

Detroit AA

During the evaluation period, Huntington made 54 investments totaling \$6.1 million in the Detroit AA, comprised of investments in low-income housing tax credit funds and cash contributions. This investment volume represents 25 percent of Tier One Capital allocated to the AA, and is considered excellent. Huntington's investment activity demonstrates excellent responsiveness to the identified affordable housing and other needs of the AA. Fund investments included \$3.1 million in eight Great Lakes Capital Fund Limited Partnership and Michigan Capital Fund Limited Partnership funds supporting affordable housing initiatives in the AA. Huntington also invested in two single-investor funds where Huntington was the sole investor and was directly involved in the financing plans of the projects. Furthermore, Huntington made contributions to 22 community development organizations totaling

approximately \$149 thousand primarily for supportive services for low- and moderate-income individuals. Prior period investments that remain outstanding total \$704 thousand comprised of investments that remain outstanding and continue to support the affordable housing needs of the AA. They are comprised of two low-income housing tax credit funds and a mortgage-backed security backed by mortgage loans primarily to low- and moderate-income borrowers.

Grand Rapids AA

During the evaluation period, Huntington made 53 investments totaling \$12.4 million, or ten percent of allocated Tier One Capital in the Grand Rapids AA. This investment volume is considered good. Huntington's investment activity demonstrates good responsiveness to the identified affordable housing and other needs of the AA. Investments were comprised of investments in low-income housing tax credit funds and cash contributions. Fund investments include six Great Lakes Capital Fund Limited Partnerships and Michigan Capital Fund Limited Partnership funds totaling \$3.5 million, and \$8.2 million in single-investor funds where Huntington was the sole investor and had direct involvement in the financing plans of projects. Investment projects addressed the affordable housing needs of the area, including the need for transitional and senior housing. Furthermore, Huntington made contributions to 22 community development organizations totaling approximately \$153 thousand for neighborhood revitalization and stabilization initiatives, and for supportive services for low- and moderate-income families. Prior period investments that remain outstanding total \$1.1 million and continue to support the affordable housing needs of the AA. They are comprised of a mortgage-backed security backed by mortgages primarily to low- and moderate-income borrowers from the AA, and investments in three low-income housing tax credit funds.

Other Michigan Investments

Huntington also made qualified investments totaling \$7.3 million for affordable housing purposes in the greater Michigan statewide area that did not benefit any particular AA. These are referred to as "MI Statewide" on Table 14. Investments were made in eight Great Lakes Capital Funds for Housing and Michigan Capital Funds for Housing, two single-investor low-income housing tax credit funds, and a new markets tax credit fund. These investments further demonstrate the bank's commitment to community development initiatives. As the bank has adequately addressed the CD needs of its AAs in Michigan, we also considered the impact of these out-of-area investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Cass County, Holland, and Michigan Non-MSA AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the investment test in Michigan. In the Niles and Kalamazoo AAs, the bank's performance is stronger than the bank's overall performance in the state as reflected by a higher level of qualified investments. In the Monroe and Muskegon AAs, performance is weaker than overall performance in the state as reflected by lower investment levels, and is considered poor. Performance in the limited-scope areas did not have an impact on the overall performance in the state. Refer to the Table 14 in the state of Michigan section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

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.

Warren-Troy AA

Huntington's branches are accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are good. The bank operates 45 offices in the area. The percentage of offices located in moderate-income census tracts exceeded the percentage of the population living in those areas. While no offices are located in low-income tracts, only 1.9 percent of the population lives in these 12 census tracts. Overall, branch openings and closings did not adversely affect the availability of products and services in the AA, including low- and moderate-income geographies and individuals. During the evaluation period, Huntington purchased six offices of the former Warren Bank from the FDIC. In addition, eight offices were opened and eight were closed during the evaluation period. Three offices were opened and two closed in moderate-income geographies, while no activity occurred in low-income geographies. Branch closures were based on a reduction in business activity.

Branch office hours and the level of services available do not vary in a way that inconveniences any portions of the bank's AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, most branches offer Saturday hours. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 51 full-service ATMs within the AA.

Detroit AA

Huntington's branches are reasonably accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are adequate. The bank operates 10 offices in the area. No branches were located in low-income census tracts. With the bank's relatively limited presence in the AA, this performance is considered poor. The percentage of offices located in moderate-income tracts exceeded the percentage of the population living in those areas. Branching activity during the evaluation period improved the availability of Huntington products and services in the AA, including moderate-income geographies. Seven offices were opened including two in moderate-income neighborhoods.

One office in an upper-income geography was closed. Branch closures were based on a reduction in business activity.

Branch office hours and the level of services available do not vary in a way that inconveniences any portions of the bank's AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, most branches offer Saturday hours. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 12 full-service ATMs within the AA.

Grand Rapids AA

Huntington's branches are accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are good. The bank operates 23 offices in the area. While no offices were located in low-income census tracts, only 2.2 percent of the population lives in low-income neighborhoods. The percentage of offices located in moderate-income tracts was near to the percentage of the population living in those areas. Overall, branch openings and closings did not adversely affect the availability of products and services in the AA, including low- and moderate-income geographies and individuals. Three offices were opened and two were closed during the evaluation period. Branch closures were based on a reduction in business activity. No offices were closed in low- or moderate-income geographies. One of the branch openings was located in a moderate-income census tract.

Branch office hours and the level of services available do not vary in ways that inconvenience any portions of the bank's AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, most branches offer Saturday hours. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 29 full-service ATMs within the AA.

Community Development Services

Huntington's response to addressing community needs through the provision of CD services is excellent in the Detroit and Grand Rapids AA, and good in the Warren-Troy AA.

Warren-Troy AA

Huntington has provided a relatively high level of CD services in relation to its presence in the market. Officers and employees have used their financial expertise when assisting community development organizations and when working on community initiatives such as affordable housing and financial education programs. Two-hundred and twenty Huntington employees donated 2,726 hours in community development service during the evaluation period. Huntington has been responsive to identified community. The following are examples of CD services performed in this AA during the evaluation period:

- Employees worked with a local community development organization to provide homebuyer counseling and financial literacy seminars primarily for low- and moderate-income individuals in the AA. In addition, employees provided financial planning and fundraising assistance to the organization.
- Employees provided financial literacy, first-time homebuyer education, home-maintenance counseling, and budgeting seminars for low- and moderate-income clients of a local human services agency. In addition, an employee served on the organization's board and provided assistance on an affordable housing project.
- Huntington created a Home Saver Solutions team to inform distressed homeowners of options available to help keep their homes. Two outreach events were held in this AA.
- Twenty-four employees participated in a financial education program for approximately 250 students; the majority was from low- and moderate-income families. A similar program involving 19 employees was held in another school system where the majority of students were from low- and moderate-income families.

Detroit AA

Huntington has provided a high level of CD services in relation to its presence in the market. Officers and employees have used their financial expertise when assisting community development organizations and when working on community initiatives such as affordable housing and financial education programs. Eighty Huntington employees donated 641 hours in community development service during the evaluation period. Huntington has been responsive to community, including needs for affordable housing, supportive services for low- and moderate-income individuals, neighborhood revitalization, and financial literacy. The following are examples of CD services performed in this AA during the evaluation period:

- Huntington sponsored a financial literacy workshop in conjunction with a human services nonprofit organization. The organization serves a low-income area, and the majority of participants are low- or moderate-income individuals.
- In conjunction with a local home counseling agency, Huntington employees provided home ownership workshops and counseling to individuals who have primarily low- or moderate levels of income.
- An employee used financial expertise to serve on the board and treasurer of a local nonprofit that supports area soup kitchens, homeless shelters, and food pantries.
- An employee served on the board and finance committee of a local neighborhood nonprofit providing social service, education, and housing support programs in low-income parts of the community.
- A Huntington employee provided a financial education program to local high school students who were primarily from low- and moderate-income families.

Grand Rapids AA

Huntington has provided a high level of CD services in relation to its presence in the market. Officers and employees have used their financial expertise when assisting community development organizations and when working on community initiatives such as neighborhood revitalization, affordable housing, and financial education programs. One hundred and fifty Huntington employees donated 2,677 hours in community development service during the evaluation period. Huntington has been responsive to community, including needs for affordable housing, neighborhood revitalization, supportive services for small business owners, and financial literacy. The following are examples of CD services performed in this AA during the evaluation period:

- An employee served on the board and provided financial technical assistance to a nonprofit support organization focusing on neighborhood revitalization and stabilization for low- and moderate-income income geographies.
- Employees served on the board and the loan review committee of a local affordable housing and neighborhood revitalization organization.
- Huntington created a Home Saver Solutions team to inform distressed homeowners of options available to help keep their homes. One outreach event was held in this AA.
- An employee provided financial technical assistance and served on the board and executive committee of a neighborhood revitalization organization. Huntington partnered with this organization on several multifamily affordable housing projects in the area.
- Huntington employees provided assistance to a community development services organization that supports small businesses. Bank employees provided credit services, assisted in marketing financial services, and provided financial training.
- Huntington employees partnered with a local community college to provide various financial education courses for small business owners and low- and moderate-income individuals.
- Thirty Huntington employees partnered with a youth organization to provide financial education at a middle school that is primarily attended by students from low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Holland and Monroe AAs is not inconsistent with the bank's overall "High Satisfactory" performance in the state of Michigan. In the Cass Co., Kalamazoo, Niles, and MI Non-MSA AAs, performance is stronger than the bank's overall performance in the state. Performance in the Muskegon AA is weaker than the bank's overall performance in the state. Performance differences were due to differences in branch distribution. The combined performance in the limited-scope AAs did not affect the service test rating in Michigan. Refer to Table 15 in the state of Michigan section of appendix D for the facts and data that support these conclusions.

Other Rating Areas

- Cincinnati-Middleton, OH-KY-IN Multistate MSA
- Weirton-Steubenville, WV-OH Multistate MSA
- Wheeling, WV-OH Multistate MSA
- Youngstown-Warren-Boardman, OH-PA Multistate MSA
- State of Florida
- State of Indiana
- State of Pennsylvania
- State of West Virginia

Multistate Metropolitan Area Rating

Cincinnati-Middleton, OH-KY-IN MSA (17140)

CRA rating for the Cincinnati-Middleton, OH-KY-IN MSA³: **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:

- Community development lending is very strong and elevates otherwise good lending performance to the excellent level.
- The geographic distribution of loans is good. Mortgage lending performance is good and small loans to business performance is excellent.
- The borrower distribution of loans is excellent. Mortgage lending performance is excellent and small loans to business performance is good.
- Qualified investment activity is excellent and is particularly responsive to the affordable housing needs of the Cincinnati AA.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income levels is adequate. The provision of CD services is good.

Description of Institution's Operations in the Cincinnati-Middleton, OH-KY-IN MSA

Huntington has 42 offices within the Cincinnati-Middletown multistate MSA, offering its full range of residential, consumer, and commercial financial products and services. Within a single AA, offices are located in four Ohio counties (Butler, Clermont, Hamilton, and Warren) and three Kentucky counties (Boone, Campbell, and Kenton). With deposits of approximately \$2.1 billion, this market represents approximately 5 percent of the bank's deposits and 8 percent of reported loans from Huntington AAs. Please refer to the market profile in appendix C for detailed demographics and other performance context information for the assessment area the bank has within this MSA.

Scope of Evaluation in the Cincinnati-Middleton, OH-KY-IN MSA

We evaluated the bank's performance in the Cincinnati AA using full-scope procedures, which is also the basis for our ratings of this area.

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

In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local community. In the Cincinnati AA, we met with a neighborhood organization and a housing organization. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

The bank's performance under the lending test in the Cincinnati-Middleton, OH-KY-IN MSA is rated "Outstanding." Based on a full-scope review, the bank's performance in the Cincinnati AA is excellent.

Lending Activity

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

Huntington's lending activity is excellent in the Cincinnati AA. June 30, 2011 FDIC deposit information reflects that Huntington ranked fifth in deposits among 61 depository institutions with a 3.5 percent share of the market. According to 2010 peer HMDA data, Huntington is ranked ninth in overall home mortgage lending among more than 450 mortgage lenders. Huntington is ranked 12th in volume of home purchase loans with a 2.4 percent market share. Collectively, the top five home purchase lenders have 39 percent of the total market share. The bank ranks seventh in home refinance lending with a 3.3 percent market share. Collectively, the top five home refinance lenders have 39 percent of market share. Huntington ranks fifth in home improvement lending with a 3.9 percent market share. Collectively, the top five improvement lenders have 47 percent of market share. According to 2010 peer small business data, Huntington is ranked seventh among 92 business lenders with a 5.6 percent market share. Collectively, the top five small business lenders have 54 percent of the total market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is good in the Cincinnati AA. The bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is good in the Cincinnati AA. Refer to Tables 2, 3, 4, and 5 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home purchase loans is excellent in the Cincinnati AA. The percentage of loans originated/purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those neighborhoods. In low-income geographies, the percentage of loans is somewhat lower than the corresponding percentage of

owner-occupied housing units. Huntington's 2010 home purchase market share in both low-income and moderate-income geographies significantly exceeded its overall home purchase market share for the area.

The geographic distribution of home improvement loans is adequate. The percentage of loans originated/purchased in moderate-income geographies was near the percentage of owner-occupied housing units located in those neighborhoods. The percentage of loans in low-income geographies was well below the corresponding percentage of owner-occupied housing units. Huntington's 2010 home improvement market share in moderate-income geographies areas was near its overall share of the market. Huntington did not record a home improvement market share in low-income geographies in 2010.

The geographic distribution of home refinance loans is adequate. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied housing units located in those areas. The percentage of loans in low-income geographies was well below the corresponding percentage of owner-occupied housing units. Huntington's 2010 home refinance market share in both low-income and moderate-income geographies significantly exceeded its overall home refinance market share for the area, and further supports the overall adequate conclusion.

Small Loans to Businesses

Refer to Table 6 in the Multistate MSAs 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 Cincinnati AA. The percentage of loans in low-income geographies areas was near the percentage of businesses located in those areas, and the percentage of loans in moderate-income geographies exceeded the percentage of businesses in these area. Huntington's 2010 small business market share in both low-income and moderate-income geographies exceeded its overall small business market share for the area.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is excellent in the Cincinnati AA. As stated earlier, the bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

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

The borrower distribution of home purchase loans is excellent in the Cincinnati AA. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was somewhat below the percentage of low-income families in the AA, performance was excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home purchase market share to both low-income and moderate-income borrowers exceeded its overall home purchase market share for the AA.

The borrower distribution of home improvement loans is excellent, when considering the bank's loan performance to demographic. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was somewhat below the percentage of low-income families in the AA, performance was excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home improvement market share to both low-income and moderate-income borrowers was below its overall market share, but considered adequate.

The distribution of home refinance loans is excellent. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. The bank's 2010 moderate-income borrower market share exceeded its overall home refinance market share for the area. Additionally, Huntington's 2010 low-income borrower market share significantly exceeded its overall home refinance market share in this AA.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses in the Cincinnati AA is good. The percentage of loans to businesses with revenues of \$1 million or less was near the percentage of area businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses significantly exceeded its overall small business market share for the area.

Community Development Lending

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

Community development lending is excellent and had a significant positive impact on lending performance in the Cincinnati AA. During the evaluation period the bank originated 32 CD loans totaling \$46.2 million, representing 21 percent of Tier One Capital allocated to the AA. The CD loans demonstrated leadership and reflect a variety of community development purposes including affordable housing and economic development, both identified needs in the AA. Several loans helped provide critically needed construction and permanent financing and for the development of affordable housing and commercial properties.

For example, Huntington provided a \$1.2 million construction loan for a project that involved permanent financing from the Federal Home Loan Bank Affordable Housing Program (AHP) subsidy, an AHP direct grant, historic preservation tax credits, and funding from the City of Cincinnati HOME program. The project involved the construction of 25 affordable rental units located in a low-income Cincinnati neighborhood that is identified by the city as an area in need of revitalization. Huntington assumed a leadership role in this project providing guidance to the borrower on securing funding sources and supporting three applications for funding through the Federal Home Loan Bank.

Another example of how Huntington responded to the needs of the community is its \$1.1 million construction loan in support of a 50 unit affordable housing project. Its purpose is to provide transitional and permanent supportive housing and employment counseling for homeless veterans with mental illness and substance abuse issues. This directly addresses an identified need for transitional and supportive housing for veterans in the area. Huntington demonstrated leadership by coming forward to take over the project when another financial institution relinquished their sponsorship during the recession experienced during the evaluation period.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Considering the size of the AAs and volume of overall lending performed, the activity under flexible programs had a positive impact on lending performance in the Cincinnati AA.

Huntington's Community Access Mortgage loan program assists borrowers refinancing or purchasing properties in low- and moderate-income geographies. The program allows for higher loan to home value ratio levels with no mortgage insurance requirement, and no interest rate adjustment is necessary for lower credit scores. A total of 73 loans were made under this program in the AA during the evaluation period.

Huntington also participates in a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, over 1,350 loans were made to low- or moderate income borrowers and/or to borrowers located in low- or moderate-income parts of the AA.

INVESTMENT TEST

The bank's performance under the investment test in the Cincinnati-Middleton, OH-KY-IN MSA is rated "Outstanding." Based on a full-scope review, the bank's performance in the Cincinnati AA is excellent. Refer to Table 14 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Huntington made 42 investments totaling \$27.3 million. This investment volume represents 13 percent of Tier One Capital allocated to the AA, and is considered excellent. Investments are comprised of low-income housing tax credit, new market tax credit, and historic tax credit funds, a mortgage-backed security backed by mortgages to low- and moderate-income borrowers, and cash contributions to local community organizations for community development purposes. The investments demonstrate excellent responsiveness to the identified affordable housing and other needs of the AA.

Huntington invested \$9.6 million in 16 Ohio Equity Fund Limited Partnership funds. These low-income housing tax credit funds are administered by the Ohio Capital Corporation for Housing and support affordable housing projects within the AA. Investments totaling \$12.4 million were also made in five single-investor low-income housing tax credit funds supporting affordable housing projects with a total of 557 rental units, with additional projects planned through one of the funds. Huntington is the sole investor in these five funds and had direct involvement in the financing plans for the projects. An example of the complexities of the financing is a project involving the historic rehabilitation of fourteen apartment buildings, which will result in the renovation of sixty-five affordable units located targeted to low-income families. The buildings are listed on the National Register of Historic Places. The transaction was complex with multiple financing sources. Huntington provided over \$6 million in financing involving low-income housing and federal historic tax credits. Other financing components included a loan and tax incentives from the city, a loan from the Ohio Housing Financing Agency, and a construction loan.

Furthermore, Huntington made contributions to 12 community development organizations totaling approximately \$59 thousand for education and academic programs for disadvantaged youth, health care for low- and moderate-income individuals, and affordable housing. Prior period investments that remain outstanding total \$378 thousand and include a mortgage-backed security backed by mortgages primarily to low- and moderate-income borrowers.

SERVICE TEST

The bank's performance under the service test in the Cincinnati-Middleton, OH-KY-IN MSA is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Cincinnati AA is good.

Retail Banking Services

Refer to Table 15 in the Multistate MSAs 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.

Huntington's branches are reasonably accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are adequate. The bank operates 42 offices in the area. The percentage of offices located in moderate-income census tracts was near to the portion of the population living in those areas. No offices are located in low-income tracts, which is considered very poor. Overall, branch activity improved the availability of Huntington products and services in the AA as a whole, including the moderate-income neighborhoods. During the evaluation period, Huntington expanded its branch network in the area by opening 12 offices while closing five. Two branches were opened and one was closed in moderate-income neighborhoods, while no activity occurred in low-income areas. Branch closures were based on a reduction in business activity.

Branch office hours and the level of services available do not vary in ways that inconvenience any portions of the bank's AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, many branches offer Saturday hours. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 102 full-service ATMs within the AA, including off-site locations such as grocery stores.

Community Development Services

Huntington has provided a relatively high level of CD services in relation to its presence in the market. Services provided within the Cincinnati AA include programs for affordable housing, social services targeted to low- and moderate-income individuals, and financial literacy programs. Officers and employees have used their financial expertise as members of boards and project committees. One hundred and ninety-three Huntington employees donated 1,090 hours in community development service during the evaluation period. Huntington has been responsive to community needs, including needs for affordable housing, neighborhood stabilization, support for small businesses, and financial literacy. Some examples of CD services performed in this AA during the evaluation period are:

- An employee served as a board member and as a member of a loan review committee for an economic development corporation that provides financing and entrepreneurial assistance for companies that locate or expand in designated enterprise zones or community reinvestment areas in this AA.
- Twenty-four Huntington employees worked with a local nonprofit organization to provide a series of 35 financial literacy and training workshops for nearly 400 unemployed and underemployed individuals. Other employees worked with another organization to provide credit

building, financial training, and homeowner counseling to low- and moderate-income individuals.

- Huntington created a Home Saver Solutions team to inform distressed homeowners of options available to help keep their homes. Two outreach events were held in this AA.
- An employee served as a member on the board of a housing organization that focuses on helping to provide affordable transition housing for homeless women and children.

Multistate Metropolitan Area Rating

Weirton-Steubenville, WV-OH MSA (48260)

CRA rating for the Weirton-Steubenville, WV-OH MSA⁴: **Satisfactory**

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

The major factors that support this rating include:

- The geographic distribution of loans is good. Mortgage lending performance and small loans to business lending performance are both good.
- The borrower distribution of loans is good. Mortgage lending performance and small loans to business lending performance are both good.
- Community development lending is good in the Weirton AA and has a positive impact on lending performance.
- Investment performance in the Weirton AA is poor.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income levels is good. The provision of CD services is adequate.

Description of Institution's Operations in the Weirton-Steubenville, WV-OH MSA

Huntington has 11 offices within the Weirton-Steubenville multistate MSA, offering its full range of residential, consumer, and commercial financial products and services. Within a single AA, offices are located in Ohio's Jefferson County and Hancock County in West Virginia. Huntington entered this market through the merger with Sky Financial. With deposits of \$378 million, this is one of the bank's smallest rating areas, representing less than one percent of the bank's deposits and reported loans. Nevertheless, among depository institutions, Huntington has the largest deposit market share and number of offices in the area. Please refer to the market profile in appendix C for detailed demographics and other performance context information.

Scope of Evaluation in the Weirton-Steubenville, WV-OH MSA

We evaluated the bank's performance in the Weirton AA using full-scope procedures, which is also the basis for our ratings of this area. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

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

In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local community. In the Weirton AA, we met with a community action agency and a health services organization. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

The bank's performance under the lending test in the Weirton-Steubenville, WV-OH MSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Weirton AA is good.

Lending Activity

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

Huntington's lending activity is excellent in the Weirton AA. Lending is commensurate with the bank's share of the local deposit market, especially when considering the large number of lenders operating in the area. As described in the market profile in appendix C, the majority of lenders operating in the AA do not have branches in the area or are not insured depository institutions.

June 30, 2011 FDIC deposit information reflects that Huntington ranked first in deposits among 12 depository institutions with a 26.1 percent share of the market. According to 2010 aggregate HMDA data, Huntington is ranked first in overall home mortgage lending among more than 100 mortgage lenders. Huntington is first in volume of originated/purchased home purchase and home refinance loans with market shares of 14.5 percent and 30.1 percent respectively. Huntington is ranked second in home improvement lending with a market share of 15.5 percent. According to small business aggregate data for 2010, Huntington is ranked first among 31 business lenders with a 17.5 percent share of the market.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is good in the Weirton AA. The bank did not originate or purchase a sufficient volume of small loans to farms in the AA to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is good in the Weirton AA. Refer to Tables 2, 3, 4, and 5 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. We also considered that there are very limited opportunities for mortgage lending in low-income geographies, as only 209 owner-occupied housing units are located in the one low-income tract in the AA. Huntington did not originate/purchase any home mortgage loans in the low-income tract during the evaluation period. Therefore, conclusions are based on lending in moderate-income tracts.

The geographic distribution of home purchase loans is adequate in the Weirton AA. The percentage of loans originated/purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 home purchase market share in moderate-income areas was below its overall home purchase market share for the AA.

The geographic distribution of home improvement loans is excellent. The percentage of loans originated/purchased in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 home improvement market share in moderate-income geographies exceeded its overall home improvement market share for the area.

The geographic distribution of home refinance loans is good. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied housing units located in those areas. However, the bank's 2010 market share of home refinance loans in moderate-income geographies significantly exceeded its overall home refinance market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate MSAs 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. While the percentage of loans in low-income geographies was below the percentage of businesses located in those areas, the percentage of loans in moderate-income geographies exceeded the demographic. Huntington's 2010 small business market share in low-income geographies significantly exceeded its overall small business market share for the area, while its market share in moderate-income geographies was somewhat below its overall market share level.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is good in the Weirton AA. As stated earlier, the bank did not originate or purchase a sufficient volume of small loans to farms in the AA to perform a meaningful analysis.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good in the Weirton AA. Refer to Tables 8, 9, and 10 in the Multistate MSAs section of appendix D for the facts and data used to

evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home purchase loans is good in the Weirton AA, when considering the bank's loan performance to demographics. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance is considered adequate when consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home purchase market share to low-income borrowers was below and to moderate-income borrowers was well below its overall home purchase market share for the area.

The borrower distribution of home improvement loans is good. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance is adequate when considering the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home improvement market share to moderate-income borrowers significantly exceeded its overall home improvement share for the area, while its share of the low-income borrowers was well below its overall home improvement market share.

The distribution of home refinance loans is excellent. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance is adequate when considering the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 market share of lending to both low-income and moderate-income borrowers significantly exceeded its overall home refinance market share in this AA.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses in the Weirton AA is good. The percentage of loans to businesses with revenues of \$1 million or less is near the percentage of area businesses that have revenues of \$1 million or less. Huntington's market share of small loans to businesses significantly exceeded its overall small business market share for the area.

Community Development Lending

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

multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Community development lending is good and has a positive impact on lending performance in the Weirton AA. During the evaluation period, the bank originated five CD loans totaling \$4.7 million, or 12 percent of allocated Tier One Capital. Huntington originated two loans totaling \$4.2 million to a developer for low-income housing purposes. Three loans totaling \$530,000 were made to a nonprofit community action and health agency that provides social service programs focusing on self-sufficiency for low- and moderate-income individuals and families. All loans addressed identified needs of the AA, as further discussed in the Weirton AA market profile in appendix C.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Programs include a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, nearly 100 loans were made to low- or moderate income borrowers and/or to borrowers located in low- or moderate-income parts of the Weirton AA. Considering the size of the AA and volume of lending performed, the activity under flexible programs had a positive impact on lending performance in the Weirton AA.

INVESTMENT TEST

The bank's performance under the investment test in the Weirton-Steubenville, WV-OH MSA is rated "Needs to Improve." Based on a full-scope review, the bank's performance in the Weirton AA is poor. Refer to Table 14 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Huntington made investments totaling \$998 thousand, including \$892 thousand of investments in seven Ohio Equity Fund Limited Partnership funds, representing three percent of allocated Tier One Capital. This level of investments is considered poor, when considering the evaluation period length. The low-income housing tax credit funds are administered by the Ohio Capital Corporation for Housing and support affordable housing projects within the AA. Huntington also purchased a mortgage-backed security backed primarily by mortgage loans to low- and moderate-income borrowers in the AA or borrowers located in low- or moderate-income neighborhoods. Furthermore, Huntington made contributions to seven community development organizations totaling approximately \$22 thousand for community development services for low- and moderate-income people. While not complex in nature, the investments addressed the identified affordable housing and supportive service needs of the AA, as further discussed in the Weirton AA market profile in appendix C.

SERVICE TEST

The bank's performance under the service test in Weirton-Steubenville, WV-OH MSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Weirton AA is good.

Retail Banking Services

Refer to Table 15 in the Multistate MSAs 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.

Huntington's branches are accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are good. The bank operates 11 offices in the area. The percentage of offices located in moderate-income census tracts was commensurate with the portion of the population living in those areas. While no offices are located in the one low-income tract, only 1.2 percent of the population lives in that area. Huntington obtained its branch network in this area when Sky Financial was acquired. No other branching activities occurred during the evaluation period in this AA.

Branch office hours and the level of services available do not vary in ways that inconvenience any portions of the bank's AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, most branches offer Saturday hours. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 11 full-service ATMs within the AA.

Community Development Services

Huntington has provided an adequate level of CD services in relation to its presence in the market. Management and employees have served the AA through board membership and providing financial, technical expertise to nonprofits, a community development organization, and local government. Sixty-one Huntington employees donated a total of 378 hours of community development service during the evaluation period. Huntington has been responsive to community needs, including needs for affordable housing, economic development, and neighborhood revitalization. Examples of CD services are as follows:

- An employee provided technical financial assistance to a planning and zoning commission where community development block grant decisions are made for the local community.
- An employee served on the board and treasurer of a local organization focusing on revitalizing a low- and moderate-income downtown area.
- Technical assistance was provided to a local affordable housing organization to prepare an Affordable Housing Program grant application to the Federal Home Loan Bank. As a result,

the organization obtained a grant used to provide food, shelter and other essential services to the low- income population.

Multistate Metropolitan Area Rating

Wheeling, WV-OH MSA (48540)

CRA rating for the Wheeling, WV-OH MSA⁵: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors that support this rating include:

- Community development lending is very strong and elevates otherwise good lending performance to the excellent level.
- The geographic distribution of loans is adequate. Mortgage lending performance is adequate, and loans to small business performance is good.
- The borrower distribution of loans is good. Mortgage lending performance is good, and loans to small business performance is excellent.
- Qualified investment activity is excellent and is particularly responsive to the affordable housing needs of the Wheeling AA.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income levels is good. The provision of CD services is adequate.

Description of Institution's Operations in the Wheeling, WV-OH MSA

Huntington has seven offices within the Wheeling multistate MSA, offering its full range of residential, consumer, and commercial financial products and services. Within a single AA, offices are located in Ohio's Belmont County and Ohio County in West Virginia. Huntington entered this market through the merger with Sky Financial. With deposits of \$222 million, this is one of the bank's smallest rating areas. This market represents less than one percent of the bank's deposits and reported loans. Please refer to the market profile in appendix C for detailed demographics and other performance context information.

Scope of Evaluation in the Wheeling, WV-OH MSA

We evaluated the bank's performance in the Wheeling AA using full-scope procedures, which is also the basis for our ratings of this area.

In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local community. In the Wheeling AA, we met with a community improvement corporation, a

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

community action commission, and an economic development office. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

The bank's performance under the lending test in the Wheeling, WV-OH MSA is rated "Outstanding." Based on a full-scope review, the bank's performance in the Wheeling AA is excellent.

Lending Activity

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

Huntington's lending activity is excellent in the Wheeling AA. Lending is commensurate with the bank's share of the local deposit market, especially when considering the large number of lenders operating in the area.

June 30, 2011 FDIC deposit information reflects that Huntington ranked fourth in deposits among 63 depository institutions with an 8.4 percent share of the market. According to 2010 peer HMDA data, Huntington was ranked third in overall home mortgage lending among more than 120 mortgage lenders. Huntington was ranked seventh in volume of both originated or purchased home purchase and home improvement loans with 4.9 percent market shares in each loan type. Collectively, the top five home purchase lenders have 50 percent of the total home purchase market share, while the top five home improvement lenders have 70 percent of the total home improvement market share. Huntington is the leading home refinance lender with a 12.2 percent market share. Collectively the top five home refinance lenders have 46 percent of market share. According to 2010 peer small business data, Huntington is ranked sixth of 39 business lenders with a 6.6 percent share of the market. Collectively, the top five lenders have 54 percent of market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is adequate in the Wheeling AA. The bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is adequate in the Wheeling AA. Refer to Tables 2, 3, 4, and 5 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. When drawing conclusions, we also considered that there are very limited opportunities for mortgage lending in low-income geographies, as there are only one percent (355 units) of owner-occupied housing units located in the two low-income CTs. Therefore, conclusions are based on lending in moderate-income tracts. During the evaluation period, Huntington originated/purchased only one home purchase loan located in the low-income tracts, while no home refinance or home improvement loans were originated/purchased.

The geographic distribution of home purchase loans is adequate in the Wheeling AA. The percentage of loans originated/purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 market share of home purchase loans in moderate-income areas exceeded its overall home purchase market share in the area.

The geographic distribution of home improvement loans is adequate. The percentage of loans originated/purchased in moderate-income geographies areas was somewhat near the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 market share of home improvement loans in moderate-income geographies was well below its overall home improvement market share.

The geographic distribution of home refinance loans is adequate. The percentage of loans in moderate-income geographies was well below the percentage of owner-occupied housing units located in those areas. The bank's 2010 market share of home refinance loans in moderate-income geographies significantly exceeded its overall home refinance market share in this area.

Small Loans to Businesses

Refer to Table 6 in the Multistate MSAs 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. While the percentage of loans in low-income geographies was well below the percentage of businesses located in those areas, the percentage of loans in moderate-income geographies significantly exceeded the percentage of businesses. While Huntington recorded no market share in low-income geographies in 2010, its market share in moderate-income geographies significantly exceeded its overall small business market share in the area.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is good in the Wheeling AA. As stated earlier, the bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good in the Wheeling AA. Refer to Tables 8, 9, and 10 in the Multistate MSAs section of appendix D for the facts and data used to

evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home purchase loans is adequate in the Wheeling AA. The percentage of loans to moderate-income borrowers was near the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was significantly below the percentage of low-income families in the AA, performance was poor when considering the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home purchase market share to moderate-income borrowers exceeded its overall home purchase market share for the AA. The bank's 2010 home purchase market share to low-income borrowers was significantly below its overall home purchase market share for the area.

The borrower distribution of home improvement loans is good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home improvement market share to moderate-income borrowers was somewhat near its overall market share. The bank's home improvement market share to low-income borrowers was well below its overall market share.

The distribution of home refinance loans is good, when considering the bank's market share performance. The percentage of loans to moderate-income borrowers was below the percentage of moderate-income families in the AA. While the percentages of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 low-income and moderate-income borrower market shares exceeded its overall home refinance market share in this AA.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses in the Wheeling AA is excellent. The percentage of loans to businesses with revenues of \$1 million or less exceeded the percentage of area businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses significantly exceeded its overall small business market share for the area.

Community Development Lending

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

community development loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Community development lending is excellent and had a significant positive impact on lending performance in the Wheeling AA. Responsiveness to community needs is excellent. During the evaluation period the bank originated six CD loans totaling \$10.8 million, representing 47 percent of Tier One Capital allocated to the AA.

One loan totaling \$7.2 million helped to promote economic development in the AA by providing financial assistance to a small business allowing the company to expand its production and hire approximately 66 employees over a period of three years. The business enterprise also received funding from the West Virginia Economic Development Authority and the U. S. Small Business Administration totaling \$3.6 million. Huntington's CD lending activities were also responsive to the affordable housing needs of the area's homeless. Two loans totaling \$565,000 were made to a nonprofit organization that helps homeless and in-crisis youth. Loan proceeds were used to renovate one of the organization's facilities to create a youth center with 11 apartment units of transitional housing for at risk runaways, homeless youth, and youth aging out of the foster care system. The project also received a Federal Home Loan Bank AHP grant and the nonprofit will provide training classes teaching youth how to live independently and promote self-sufficiency.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Programs include a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, over 40 loans were made to low- or moderate income borrowers and/or to borrowers located in low- or moderate-income parts of the Wheeling AA. Considering the size of the AAs and volume of overall lending performed, the activity under flexible programs has a neutral impact on lending performance in the Wheeling AA.

INVESTMENT TEST

The bank's performance under the investment test in the Wheeling, WV-OH MSA is rated "Outstanding." Based on a full-scope review, the bank's performance in the Wheeling AA is excellent. Refer to Table 14 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Huntington made 11 investments totaling \$2.9 million. This investment volume represents 13 percent of Tier One Capital allocated to the AA, and is considered excellent. Bank investments are comprised primarily of investment in low-income housing tax credit funds that support the affordable housing needs of the AA. Two funds totaling \$2.5 million are single-investor funds supporting two affordable housing projects with a total of 66 rental units. Huntington is the sole investor in these two funds and had direct involvement in the financing plan for the projects, one of which is a 42-unit project for very low-

income individuals. Huntington also invested \$384 thousand in five Ohio Equity Fund Limited Partnership funds administered by the Ohio Capital Corporation for Housing. Furthermore, Huntington made contributions to three community development organizations totaling approximately \$4 thousand for affordable housing and community development services for low- and moderate-income people. Responsiveness to the needs of the community is excellent.

SERVICE TEST

The bank's performance under the service test in the Wheeling, WV-OH MSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Wheeling AA is good.

Retail Banking Services

Refer to Table 15 in the Multistate MSAs 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.

Huntington's branches are accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are good. The bank operates seven offices in the area. The percentage of offices located in moderate-income census tracts is commensurate with the portion of the population living in those areas. While no offices are located in the two low-income tracts, only 1.67 percent of the population lives in these neighborhoods. Huntington obtained its branch network in the area when Sky Financial was acquired. No other branching activities occurred during the evaluation period in this AA.

Branch office hours and the level of services available do not vary in a way that inconveniences any portions of the bank's AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, all branches offer Saturday banking hours. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates seven full-service ATMs within the AA.

Community Development Services

Huntington has provided an adequate level of CD services to the Wheeling AA in relation to its presence in the market. Management and employees served the AA through providing technical assistance and financial education, which have been responsive to community needs. Sixteen Huntington employees donated 75 hours of community development service during the evaluation period. For instance, technical assistance was provided to a nonprofit organization to prepare an Affordable Housing Program grant application to the Federal Home Loan Bank. The application resulted in a grant to support the organization's youth-based programs, which include an emergency shelter. A Huntington employee participated in a government agency financial education program for prison inmates soon to be released. A

third example is an employee participated in a program to provide several homebuyer education classes for low- and moderate-income individuals from the AA.

Multistate Metropolitan Area Rating

Youngstown-Warren-Boardman, OH-PA MSA (49660)

CRA rating for the Youngstown-Warren-Boardman, OH-PA MSA⁶: Outstanding

The lending test is rated: Outstanding

The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

The major factors that support this rating include:

- Community development lending is excellent and has a significantly positive impact on lending performance for the Youngstown AA.
- The geographic distribution of loans is adequate. Mortgage lending performance is adequate, and loans to small business performance is excellent.
- The borrower distribution of loans is good. Mortgage lending performance and loans to small business performance are both good.
- Qualified investment activity is good, and is particularly responsive to the affordable housing needs of the Youngstown AA.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income levels is good. The provision of CD services is excellent.

Description of Institution's Operations in the Youngstown-Warren-Boardman, OH-PA MSA

Huntington has 41 offices within the Youngstown-Warren-Boardman multistate MSA, offering its full range of residential, consumer, and commercial financial products and services. Within a single AA, offices are located in Trumbull and Mahoning Counties in Ohio, and Mercer County in Pennsylvania. With deposits totaling \$1.9 billion, this market represents approximately five percent of the bank's deposits and three percent of the number of reported loans from Huntington AAs. Nevertheless, among insured depository institutions, Huntington has the largest deposit market share and number of offices in the area. Huntington entered this market through the merger with Sky Financial. Please refer to the market profile in appendix C for detailed demographics and other performance context information.

Scope of Evaluation in the Youngstown-Warren-Boardman, OH-PA MSA

We evaluated the bank's performance in the Youngstown AA using full-scope procedures, which is also the basis for our ratings of this area.

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

In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local community. In the Youngstown AA, we met with a community development organization, a community organization supporting housing and development efforts, and a neighborhood development corporation. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

The bank's performance under the lending test in the Youngstown-Warren-Boardman, OH-PA MSA is rated "Outstanding." Based on a full-scope review, the bank's performance in the Youngstown AA is excellent.

Lending Activity

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

Huntington's lending activity is excellent in the Youngstown AA. Lending is commensurate with the bank's share of the local deposit market, especially when considering the large number of lenders operating in the area.

June 30, 2011 FDIC deposit information reflects that Huntington ranked first in deposits among 19 depository institutions with a 21.1 percent share of the market. According to 2010 peer HMDA data, Huntington ranked first in overall home mortgage lending among more than 250 mortgage lenders. Huntington is ranked fifth of 150 lenders in home purchase loans with 5.4 percent of market share. Collectively, the top five home purchase lenders have 43 percent of market share. The bank ranked fifth of 55 lenders in home improvement loans with a 5.5 percent market share. Collectively, the top five home improvement lenders have 47 percent of market share. Huntington is first in volume of home refinance loans with a 12.4 percent market share. According to 2010 peer small business data, Huntington is ranked third of 55 business lenders with a 12.9 percent share of the market. Collectively, the top five small business lenders have 60 percent of market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is adequate in the Youngstown AA. The bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is adequate in the Youngstown AA. In drawing our conclusions, we considered the somewhat limited opportunities for the bank to lend in low-income geographies, as less than three percent of the owner-occupied housing units are located in these geographies. As such, conclusions are based primarily on the bank's performance in moderate-income geographies. Refer to Tables 2, 3, 4, and 5 in the

Multistate MSAs section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home purchase loans is adequate in the Youngstown AA. The percentage of loans originated/purchased in low-income geographies was significantly below the percentage of owner-occupied housing units located in those neighborhoods. In moderate-income areas, the percentage of loans was lower than the corresponding percentage of owner-occupied housing units. Huntington's 2010 home purchase market share in both low-income and moderate-income areas significantly exceeded its overall home purchase market share for the area.

The geographic distribution of home improvement loans is poor. The percentage of loans originated/purchased in low-income areas was significantly below the percentage of owner-occupied housing units located in those neighborhoods. In moderate-income areas, the percentage of loans originated/purchased was well below the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 home improvement market share in moderate-income areas was significantly below its overall share of the market. The bank did not record a market share in low-income areas in 2010.

The geographic distribution of home refinance loans is adequate, when considering the bank's market share performance. The percentages of loans originated/purchased in both low-income and moderate-income geographies was significantly below the percentage of owner-occupied housing units located in those neighborhoods. Huntington's 2010 home refinance market shares in moderate-income geographies exceeded its overall share of the market, and significantly exceeded this level in low-income geographies.

Small Loans to Businesses

Refer to Table 6 in the Multistate MSAs 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 Youngstown AA. The percentages of loans in both low-income and moderate-income geographies areas exceeded the percentages of businesses located in those respective areas. Huntington's 2010 small business market share in low-income geographies areas exceeded its overall small business market share, and significantly exceeded its overall share in moderate-income geographies.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is good in the Youngstown AA. As stated earlier, the bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good in the Youngstown AA. Refer to Tables 8, 9, and 10 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home purchase loans is good in the Youngstown AA. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was below the percentage of low-income families in the AA, performance was good considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home purchase market share to moderate-income borrowers exceeded its overall home purchase market share for the area. The bank's 2010 home purchase market share to low-income borrowers was lower than its overall home purchase market share for the area.

The borrower distribution of home improvement loans is excellent. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was somewhat below the percentage of low-income families in the AA, performance was excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home improvement market share for low-income borrowers exceeded its overall home improvement market share, while the market share for moderate-income borrows was near the overall market share level.

The distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was considered adequate when consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 low-income and moderate-income borrower market shares both exceeded its overall home refinance market share in this AA.

Small Loans to Businesses

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

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

area businesses that have revenues of \$1 million or less. Huntington's market share of small loans to businesses significantly exceeded its overall small business market share for the area.

Community Development Lending

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

Community development lending is excellent and had a significantly positive impact on lending performance in the Youngstown AA. During the evaluation period the bank originated 21 CD loans totaling \$47.1 million, representing 24 percent of allocated Tier One Capital allocated to the AA. Huntington's CD lending activity reflects a high level of responsiveness to community needs. Loans were for a variety of community development purposes, including the need to revitalize and stabilize moderate-income geographies, and the need for affordable housing. For example, Huntington provided \$11.6 million in financing to the City of Youngstown to replace current bond anticipation notes issued to fund the construction of a convocation center, a project that is a component of a city neighborhood plan to revitalize a moderate-income portion of downtown Youngstown. City planners identify job creation, economic development, and neighborhood stabilization as keys to the future progress of Youngstown.

In another example, Huntington provided financing to the City of Girard to fund improvements to a public service facility located in a moderate-income geography. The project helps retain jobs, act as a catalyst to further development, and attract new businesses to the downtown district.

Consistent with its corporate community development strategy, Huntington demonstrated leadership and responsiveness when the bank provided financing to a local nonprofit service organization for the adaptive reuse of an existing structure in order to create 30 units of permanent supportive and transitional housing. The facility is located in a moderate-income geography in Youngstown and primarily serves disabled and low-income single women. This project received multiple funding sources including low-income housing tax credits, historic tax credits, a Federal Home Loan Bank Affordable Housing Program grant, and a loan from the Ohio Finance Agency.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Programs include a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, just over 400 loans were made to low- or moderate income borrowers and/or to borrowers located in low- or moderate-income parts of the Youngstown AA. Considering the size of the AAs and volume of

overall lending performed, the activity under flexible programs has a neutral impact on lending performance in the Youngstown AA.

INVESTMENT TEST

The bank's performance under the investment test in the Youngstown-Warren-Boardman, OH-PA MSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Youngstown AA is good. Refer to Table 14 in the Multistate MSAs section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Huntington made 27 investments totaling \$15 million, or eight percent of allocated Tier One Capital. These investments were comprised of low-income housing tax credit funds, a mortgage-backed security, and cash contributions. The overall level of investment activity is relatively high in relation to the bank's operations in the area and is considered good. The investments are responsive and primarily address the affordable housing needs of the AA

Investments totaling \$1.4 million were made in eight Ohio Equity Fund Limited Partnership funds administered by the Ohio Capital Corporation for Housing. Investments totaling \$12.8 million were made in three additional single-investor low-income housing tax credit funds supporting specific projects in the local community. In these funds, Huntington is the sole investor and is directly involved in the financing plans for the projects. For instance, one fund is supporting the rehabilitation of a 150-unit housing project, while another fund is supporting a 30-unit affordable housing project for homeless and at-risk women and children. Huntington also purchased a mortgage-backed security backed by \$764 thousand in mortgages to low- and moderate-income borrowers from the AA. Furthermore, contributions were made to 10 community development organizations totaling approximately \$41 thousand for affordable housing, community development services for low- and moderate-income people, economic development, and efforts to revitalize/stabilize low- and moderate-income geographies of the AA.

SERVICE TEST

The bank's performance under the service test in the Youngstown-Warren-Boardman, OH-PA MSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Youngstown AA is good.

Retail Banking Services

Refer to Table 15 in the Multistate MSA 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.

Huntington's branches are accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are good. The bank operates 41 offices in the area. The percentages of offices located in low-income and moderate-income areas were below and near to the population living in those areas, respectively. Branch activity has not adversely affected the accessibility of bank products and services for the AA as

a whole. Huntington obtained its branch network in the area when Sky Financial was acquired. In addition, five offices were opened and five were closed during the evaluation period. One of the offices opened is in a moderate-income geography. Branch closures were based on a reduction in business activity.

Branch office hours and the level of services available do not vary in ways that inconvenience any portions of the bank's AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, most branches offer Saturday hours and branches in grocery stores offer Sunday hours. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 47 full-service ATMs within the AA, including some located in off-site locations such as grocery stores.

Community Development Services

Huntington has provided an excellent level of CD services in relation to its presence in the Youngstown AA, including financial education targeted to low- and moderate-income individuals. Officers and employees have used their financial expertise as members of director boards and leading project committees. Three hundred and seventy-two employees donated 2,040 hours of community development service during the evaluation period. Huntington has been responsive to community needs, including needs for affordable housing, economic development, and support for small business lending. Some examples of CD services performed in this AA during the evaluation period are:

- Technical assistance was provided to a nonprofit organization to prepare an Affordable Housing Program grant application to the Federal Home Loan Bank. The application resulted in a grant to support an affordable housing program.
- Two employees served on the loan review committee for an economic development organization.
- Bank employees provided technical assistance to a local nonprofit organization with a focus on affordable housing initiatives.
- Huntington created a Home Saver Solutions team to inform distressed homeowners of options available to help keep their homes. Two outreach events were held in this AA.
- Huntington employees provided expertise and financial technical assistance to a small business incubator.
- Thirteen Huntington employees participated in the "Huntington Kids Club" at an elementary school where the majority of students are from low- and moderate-income families. The program provides financial education such as budgeting and savings and in the form of hands-on experience as tellers and customer service representatives.

State Rating

State of Florida

CRA Rating for Florida⁷:	Satisfactory
The lending test is rated:	<u>Low Satisfactory</u>
The investment test is rated:	<u>High Satisfactory</u>
The service test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- The geographic distribution of loans is good. Mortgage lending performance is good and loans to small business performance is adequate.
- The borrower distribution of loans is adequate. Mortgage lending performance is adequate, and small loans to business performance is excellent.
- Qualified investment activity is good, and is particularly responsive to the affordable housing needs of the Naples AA.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income levels is adequate. The provision of CD services is also adequate.

Description of Institution's Operations in Florida

Huntington operates two offices in Florida, both located in a single AA comprised of Collier County, which is also the Naples-Marco Island MSA. While the bank's full range of residential, consumer, and commercial financial products and services are available, they are not actively marketed as Huntington's local focus is serving wealth management customers. This is one of the bank's smallest market areas. With deposits totaling \$71 million, the area represents less than one percent of the bank's deposits and number of reported loans. Refer to the market profile for the state of Florida in appendix C for detailed demographics and other performance context information for the Naples AA area that received a full-scope review.

Scope of Evaluation in Florida

We evaluated the bank's performance in the Naples AA using full-scope procedures, which is also the basis for our ratings of this area.

In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local

⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

community. In the Naples AA, we met with a representative from a human services office, a housing organization, and a small business development organization. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

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

Lending Activity

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

Huntington originated/purchased only 317 reported loans during the evaluation period in the Naples AA. Regardless, lending activity is adequate considering market rankings and market shares, along with the bank's limited presence and business focus in the area.

June 30, 2011 FDIC deposit information reflects that Huntington ranked 27th in deposits among 41 depository institutions with a 0.7 percent share of the market. According to 2010 peer HMDA data, Huntington is ranked 26th in overall home mortgage lending among nearly 450 mortgage lenders. Huntington ranked 24th of 314 home purchase lenders with a 0.96 percent market share. Huntington had a 0.89 percent market share for home refinance loans and ranked 22nd of 295 lenders. Huntington is not an active home improvement lender in this market, with only two loans originated or purchased during the evaluation period. According to 2010 peer small business data, Huntington is ranked 35th of 84 business lenders with a market share of less than one percent.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good. This is based on good performance in the Naples AA. The bank did not originate or purchase a sufficient volume of home improvement or small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is good. In drawing our conclusions, we considered that there are limited opportunities for mortgage lending in low-income geographies. Less than three percent of the AA's owner-occupied housing units are located in the low-income census tracts. Therefore, conclusions are based primarily on lending in moderate-income tracts. 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 and purchases.

The geographic distribution of home purchase loans is excellent. The percentage of loans originated/purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those neighborhoods. In moderate-income geographies, the percentage of loans significantly exceeded the corresponding percentage of owner-occupied

housing units. While Huntington's overall 2010 home purchase market share was too small for meaningful analysis, it is observed that the bank's share in both low-income and moderate-income geographies significantly exceeded its overall home purchase market share for the area.

The geographic distribution of home refinance loans is adequate. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied housing units located in those neighborhoods. The percentage of lending in low-income geographies was significantly below the corresponding percentage of owner-occupied housing units. While Huntington's overall 2010 home refinance market share was too small for meaningful analysis it is observed that the bank's market share in moderate-income geographies significantly exceeded its overall home refinance market share for the area. The bank did not record a market share in low-income geographies.

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 adequate in the Naples AA. The percentage of loans in low-income geographies significantly exceeded the percentage of businesses located in those parts of the AA. The percentage of loans in moderate-income geographies was significantly below the corresponding percentage of businesses located in these geographies. The bank's overall small loans to businesses market share was less than one percent, therefore an analysis was not meaningful.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in the Naples AA.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans is adequate. This is based on adequate performance in the Naples AA. As stated earlier, the bank did not originate or purchase a sufficient volume of home improvement or small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The borrower distribution of home mortgage loans is adequate. Refer to Tables 8, 9, and 10 in the 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.

The borrower distribution of home purchase loans is good, when considering the bank's market share performance. While the percentage of loans to low-income borrowers is below the percentage of low-income families in the AA, performance was good considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of

the community. The percentage of loans to moderate-income borrowers was significantly below the percentage of moderate-income families in the AA. Huntington's 2010 market share to low-income borrowers significantly exceeded its overall share for the area. The bank's 2010 market share of moderate-income borrowers exceeded its overall home purchase market share for the area.

The borrower distribution of home refinance loans is very poor. No loans were made to low-income borrowers during the evaluation period. The percentage of loans to moderate-income borrowers was significantly below the percentage of moderate-income families in the AA. The bank's overall home refinance market share was less than one percent; therefore, an analysis was not meaningful.

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/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 exceeded the percentage of area businesses that have revenues of \$1 million or less. The bank's overall small loans to businesses market share was less than one percent, therefore an analysis was not meaningful.

Community Development Lending

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

Huntington did not originate any CD loans in the Naples MSA AA during the evaluation period. Community development lending had a neutral impact on lending performance in the AA.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Programs include a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, few of these flexible loan types were made to low- or moderate income borrowers and/or to borrowers located in low- or moderate-income parts of the Naples AA. Considering the size of the AAs and volume of overall lending performed, the activity under flexible programs has a neutral impact on lending performance in the Naples AA.

INVESTMENT TEST

The bank's performance under the investment test in Florida is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Naples AA is good. Refer to Table 14 in the state of Florida section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Huntington made five investments totaling \$639 thousand, or nine percent of allocated Tier One Capital. This level of investment activity is relatively high in relation to the bank's operations in the area and is considered good. Responsiveness to community needs is adequate. While not complex in nature, the investments addressed the identified affordable housing and supportive service needs of the AA. These investments were comprised primarily of a \$600 thousand low-income housing tax credit fund that supports affordable housing projects within the local community. Also, a \$34 thousand equity investment was made in an organization that constructs and rehabilitates multifamily affordable housing. Furthermore, Huntington made \$5 thousand in contributions to a community development organization providing community development services for low- and moderate-income people.

Other Florida Investments

Huntington also made qualified investments totaling \$22 thousand supporting affordable housing needs in the greater Florida statewide area that did not benefit the Naples AA, further demonstrating the bank's commitment to community development initiatives. These are reflected as "FL Statewide" on table 14. As the bank has adequately addressed the CD needs of its AA in Florida, we also considered the impact of these out-of-area investments.

SERVICE TEST

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

Huntington's branches are reasonably accessible to geographies and individuals of different income levels in the AA. Both Huntington branches in this AA are located in upper-income tracts. With its very limited presence in the market, Huntington's two offices are considered adequate for delivering retail banking services. In drawing conclusions, consideration is given to the bank's local focus of serving its wealth management customers, and that the area is served by many other financial institutions, as discussed in the market profile section in appendix C. No Huntington branch activity occurred within the AA during the evaluation period.

The bank's branch office hours and the level of services available are adequate. In addition to offering Monday through Friday banking hours, branch personnel are available for

appointments outside the standard service hours. There are no Huntington ATMs serving the AA, but telephone and Internet banking are alternative delivery systems that allow customers to access their accounts outside of regular banking hours.

Community Development Services

The provision of CD services by Huntington is adequate in relation to its limited presence in the market. Two employees used their financial-related expertise while serving on the boards of two local organizations that provide health and social services to low- and moderate-income individuals within the AA and donated 248 hours of community development service in the AA. These activities are responsive to community needs.

State Rating

State of Indiana

CRA Rating for Indiana⁸:	Satisfactory
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Outstanding</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- The geographic distribution of loans is adequate. Mortgage lending performance is adequate, and small loans to business performance is excellent.
- The borrower distribution of loans is good. Mortgage lending performance is good, and small loans to business performance is excellent.
- Community development lending is good and had a positive impact on lending performance.
- Qualified investment activity is excellent and is particularly responsive to the affordable housing needs of the community. While investment activity is considered good in the Indianapolis full-scope AA, significant investments made in greater Indiana statewide area that do not benefit any AA elevate the bank's overall performance in Indiana.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income is considered good overall. The provision of CD services is excellent.

Description of Institution's Operations in Indiana

Huntington has 53 offices within the state of Indiana, offering its full range of residential, consumer, and commercial financial products and services. With Indiana deposits totaling \$2.3 billion, this state represents approximately five percent of the bank's deposits and seven percent of reported loans from Huntington AAs.

Huntington has four AAs in Indiana with offices located in four MSAs. Huntington's primary market area in Indiana is the Indianapolis MSA where the bank has 46 offices and \$2.1 billion in deposits. The bank also has AAs in the Anderson, Fort Wayne, and Lafayette MSAs. Huntington entered the Fort Wayne market and expanded its presence in the Indianapolis MSA through the merger with Sky Financial.

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

Please refer to the market profile for the state of Indiana in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review. Refer to appendix A for the counties that comprise the limited-scope AA.

Scope of Evaluation in Indiana

The Indianapolis MSA was selected for a full-scope review. With deposits totaling \$2.1 billion, this area represents 91 percent of its Indiana deposits and 82 percent of reported Indiana loans. Performance in the other three AAs was assessed using limited-scope procedures. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

Indiana ratings are based primarily on conclusions reached for performance in the Indianapolis AA where we used full-scope procedures. In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local community in the full-scope AA. In the Indianapolis AA, we met an economic development organization, a social services office, and a small business organization. Refer to the market profile in appendix C for community information, including identified needs.

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

Huntington's lending activity is good in the Indianapolis AA. Considering market rankings and market shares, lending is generally commensurate with the bank's local deposit presence, especially when considering the large number of lenders operating in the area.

June 30, 2011 FDIC deposit information reflects that Huntington ranked fourth in deposits among 40 depository institutions with a 7.1 percent share of the market. This rank placed the bank in the top ten percent of depository institutions. According to 2010 peer HMDA data, Huntington is ranked ninth in overall home mortgage lending among nearly 500 mortgage lenders. With a 2.0 market share, Huntington ranked 13th of 316 home purchase lenders, which placed the bank in the top five percent of lenders. Collectively, the top five home purchase lenders have 37 percent of the total market share. With a 2.4 market share, the bank ranked ninth of 105 home improvement lenders, which placed the bank in the top 13 percent of lenders. Collectively, the top five home improvement lenders have 33 percent of the total market share. Huntington ranked ninth of 422 lenders in home refinance lending with a 3.5 percent market share. This rank placed the bank in the top two percent of home refinance lenders. Collectively, the top five refinance lenders have 37 percent of market share. According to 2010 peer small business data, Huntington ranked fourth of 95 small business lenders with a 5.4 percent market share. Collectively, the top five small business lenders have 45 percent of the total market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is adequate. The bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is adequate. 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 and purchases.

The geographic distribution of home purchase loans is good in the Indianapolis AA. The percentages of loans originated/purchased in both low-income and moderate-income geographies were lower than the corresponding percentages of owner-occupied housing units located in those neighborhoods. Huntington's 2010 home purchase market share in both low-income and moderate-income geographies significantly exceeded its overall home purchase market share for the AA.

The geographic distribution of home improvement loans is excellent. The percentage of loans originated/purchased in low-income areas significantly exceeded the percentage of owner-occupied housing units located in those neighborhoods. In moderate-income areas, the percentage of loans was near the corresponding percentage of owner-occupied housing units. Huntington's 2010 market shares in both low-income and moderate-income areas significantly exceeded its overall home improvement market share for the AA.

The geographic distribution of home refinance loans is poor, when considering the bank's market share performance. The percentages of loans in both low-income and moderate-income geographies was significantly below the corresponding percentages of owner-occupied housing units located in those neighborhoods. However, Huntington's 2010 home refinance market share in both low-income and moderate-income geographies significantly exceeded its overall home refinance market share for the AA.

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 excellent. The percentage of loans in low-income areas significantly exceeded the percentage of businesses located in these geographies. The percentage of loans in moderate-income geographies approximated the corresponding percentage of businesses located these areas. Huntington's 2010 small business market share in both low-income and moderate-income geographies significantly exceeded its overall small business market share for the AA.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in the Indianapolis AA.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans is good. As stated earlier, the bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good. 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.

The borrower distribution of home purchase loans is good. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was below the percentage of low-income families in the AA, performance was good considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 market share of moderate-income borrowers was near its overall home purchase market share for the AA. Huntington's 2010 market share to low-income borrowers exceeded its overall share for the AA.

The borrower distribution of home improvement loans is excellent. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was somewhat near the percentage of low-income families in the AA, performance was excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home improvement market shares to both low-income and moderate-income borrowers significantly exceeded its overall home improvement market share for the AA.

The borrower distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 market share for moderate-income borrowers exceeded its overall home refinance market share for the AA. The bank's 2010 market share for low-income borrowers significantly exceeded its overall home refinance market share for the AA.

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/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is excellent in the Indianapolis AA. The percentage of loans to businesses with revenues of \$1 million or less substantially meets the percentage of area businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses with revenues of \$1 million or less significantly exceeded its overall small business market share for the AA.

Community Development Lending

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

Community development lending is good and had a positive impact on lending performance in the Indianapolis AA. Responsiveness to community needs is good. During the evaluation period, the bank originated 24 CD loans totaling \$39.2 million, or 19 percent of allocated Tier One Capital. The CD loans primarily supported organizations that provide affordable housing opportunities and organizations that provide services to low- and moderate-income individuals and families, which are identified needs as further discussed in the Indianapolis AA market profile in appendix C. For example, Huntington provided a \$12 million construction loan to a developer of a 144 unit apartment community qualified for low-income housing tax credits and located in a moderate-income census tract on the west side of Indianapolis. The project includes a mix of one, two, and three-bedroom apartments with rental rates targeted to residents earning 60 percent of the area median income. The project also includes a community center, retail space, and commercial space.

Other Indiana CD Loans

Huntington also made three CD loans totaling \$4.5 million in the greater Indiana statewide area that did not benefit any particular AA. These loans are reflected as "IN Statewide" on Table 1. The loans support affordable housing and neighborhood revitalization and stabilization initiatives. As the bank has adequately addressed the CD needs of its AAs in Indiana, we also considered the impact of these out-of-area CD loans.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Considering the size of the AA and volume of overall lending performed, the activity under flexible programs has a positive impact on lending performance in the Indianapolis AA.

Huntington's Community Access Mortgage loan program assists borrowers refinancing or purchasing properties in low- and moderate-income geographies. The program allows for higher loan to home value ratio levels with no mortgage insurance requirement, and no interest rate adjustment is necessary for lower credit scores. A total of 65 loans were made under this program in the Indianapolis AA during the evaluation period.

Huntington also participates in a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, over 800 loans were made to low- or moderate income borrowers and/or to borrowers located in low- or moderate-income parts of the Indianapolis AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Lafayette AA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Indiana. In the Anderson and Fort Wayne AAs, the bank's performance is weaker than the bank's overall performance in the state, as reflected by lower levels of CD lending. The limited-scope performance did not have a material impact on the lending test rating for Indiana. Refer to the Tables 1 through 13 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Indiana is rated "Outstanding." Based on a full-scope review, the bank's performance in the Indianapolis AA is good. Significant investments in the greater Indiana statewide area that do not benefit any AA elevate the rating for the state from good to excellent. Refer to Table 14 in the state of Indiana section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

During the evaluation period, Huntington made 135 investments totaling \$17.8 million, or nine percent of allocated Tier One Capital in the Indianapolis AA. Overall, the bank's level of investment activity is relatively high in relation to the bank's operations in the Indianapolis AA and is considered good. Investments demonstrate adequate responsiveness to the needs of the community, especially with regard to affordable housing. Investments were comprised primarily of \$16.7 million in six single-investor low-income housing tax credit funds that support local affordable housing projects involving 709 housing units. Huntington is the only investor in these funds and has direct involvement in the financing plans of the projects. Investments also include \$595 thousand invested in five Great Lakes Capital Fund for Housing Limited Partnership funds that also support affordable housing projects in the area. In addition, a \$61 thousand investment was made in a mortgage-backed security backed by residential mortgage loans primarily to low- and moderate-income borrowers in the AA. Furthermore, Huntington made contributions to 58 community development organizations totaling approximately \$488 thousand for affordable housing, community development services for low- and moderate-income people, economic development, and efforts to revitalize / stabilize low- and moderate-income parts of the AA. Prior period investments that remain outstanding total \$512 thousand for affordable housing purposes.

Other Indiana Investments

Huntington also made a significant amount of qualified investments totaling \$16.9 million for affordable housing purposes in the greater Indiana statewide area that did not benefit any particular AA. These are reflected as "IN Statewide" on Table 14. As the bank's performance

is at least adequate in each Indiana AA, we also considered the impact of these out-of-area investments. Investments were made in four single-investor low-income housing tax credit funds supporting affordable housing projects in Brown, Jackson, Parke, and Shelby counties and further demonstrate the bank's commitment to community development initiatives. The investments in the state of Indiana, at 7.0 percent of state allocated tier one capital, had a significantly positive impact on the investment test rating for the state.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Anderson and Fort Wayne AAs is not inconsistent with the bank's overall "Outstanding" performance under the investment in Indiana. In the Lafayette AA, the bank's performance is weaker than the bank's overall performance in the state as reflected by a lower level of qualified investments, and is considered good. The performance in the limited-scope areas did not impact the investment test rating for Indiana. Refer to the Table 14 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

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.

Huntington's branches are accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are good. The bank operates 46 offices in the area. The percentage of offices located in low-income census tracts is commensurate with the portion of the population living in those areas. The percentage of offices located in moderate-income census tracts is lower than the portion of the population living in moderate-income geographies. Overall, branch openings and closings generally did not affect the accessibility of Huntington products and services in the AA as a whole, including low- and moderate-income geographies or low- and moderate-income individuals. Huntington expanded its branch network in the area when Sky Financial was acquired. In addition, Huntington opened five branches and closed nine branches. One branch was opened in a moderate-income geography. None of the closures occurred in low- or moderate-income geographies. Branch closures were based on a reduction in business activity.

Branch office hours and the level of services available do not vary in a way that inconveniences any portions of the bank's AA, including low- and moderate-income geographies. Office hours and services are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Thursday banking hours, most offices offer extended Friday hours and Saturday

hours. Branch personnel are also available for appointments outside the standard service hours. Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 63 full-service ATMs within the AA, including some in off-premise locations such as grocery stores.

Community Development Services

Huntington has provided an excellent level of CD services in relation to its presence in the market. Officers and employees have used their financial expertise as members of director boards, leading project committees, and providing financial education credit building and first-time homebuyer seminars targeted to low- and moderate-income individuals and geographies. In the Indianapolis AA, 385 employees donated 2,666 hours in CD service. Huntington has been responsive to community needs, including needs for affordable housing, neighborhood revitalization, and financial education. Some examples of CD services performed in this AA during the evaluation period are:

- Employees served in various capacities, including developing loan programs and conducting financial education workshops, at a local housing organization focused on providing affordable housing and neighborhood viability. Furthermore, Huntington is one of several banks participating in the organization's housing repair loan program.
- Technical assistance was provided to a local social services organization to prepare an Affordable Housing Program grant application to the Federal Home Loan Bank for a temporary emergency shelter.
- The bank participated in a local program focused on helping the homeless, low- and moderate-income, unbanked, and under-banked individuals establish bank accounts, avoid check cashing fees, and become financially literate.
- Huntington created a Home Saver Solutions team to inform distressed homeowners of options available to help keep their homes. Two outreach events were held in this AA.
- Employees worked with a local organization to provide financial services education to homeless and young adults to help exit street life.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Anderson and Lafayette AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the service test in the Indianapolis MSA. The bank's performance is weaker in the Fort Wayne AA due to branch distribution, and is considered adequate. The combined limited-scope area performance did not have an impact on the state rating. Refer to Table 15 for the state of Indiana in appendix D for the facts and data that support these conclusions.

State Rating

State of Pennsylvania

CRA Rating for Pennsylvania⁹: **Outstanding**
The lending test is rated: Outstanding
The investment test is rated: Low Satisfactory
The service test is rated: Outstanding

The major factors that support this rating include:

- Community development lending is very strong and elevates otherwise good lending performance to the excellent level.
- The geographic distribution of loans is good. Mortgage lending performance and small loans to business performance are both good.
- The borrower distribution of loans is excellent. Mortgage lending performance and small loans to business performance are excellent.
- Qualified investment activity is adequate and is particularly responsive to the affordable housing needs.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income levels is excellent. The provision of CD services is also excellent.

Description of Institution's Operations in Pennsylvania

Huntington has 56 offices within the state of Pennsylvania, offering its full range of residential, consumer, and commercial financial products and services. With deposits totaling \$2.7 billion, this state represents approximately six percent of the bank's deposits and four percent of reported AA loans. Huntington entered the three Pennsylvania markets through the merger with Sky Financial.

Huntington has three AAs in Pennsylvania with offices located in two MSAs and one non-MSA county. Huntington's primary market area in Pennsylvania is the Pittsburgh MSA where the bank has 44 offices and \$2.3 billion in deposits. The bank also has an AA in the Erie MSA, and an AA comprised Lawrence County, which is not located in any MSA.

Please refer to the market profile for the state of Pennsylvania in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review. Refer to appendix A for listing of counties that comprise the limited-scope AAs.

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

Scope of Evaluation in Pennsylvania

The Pittsburgh AA was selected for a full-scope review. With deposits totaling \$2.3 billion, this area represents 88 percent of its Pennsylvania deposits and 79 percent of reported AA loans in Pennsylvania. Performance in the Erie and Lawrence County AAs was assessed using limited-scope procedures. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

Pennsylvania ratings are based primarily on conclusions reached for performance in the Pittsburgh AA where we used full-scope procedures. In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local community in the full-scope AA. In the Pittsburgh AA, we met with a community reinvestment organization and a redevelopment office. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Pennsylvania is rated "Outstanding." Based on a full-scope review, the bank's performance in the Pittsburgh AA is excellent.

Lending Activity

Huntington's lending activity is good in the Pittsburgh AA. Considering market rankings and market shares, lending is generally commensurate with the bank's local deposit presence, especially when considering the large number of lenders operating in the area.

June 30, 2011 FDIC deposit information reflects that Huntington ranked seventh in deposits among 54 depository institutions with a 3.0 percent share of the market. This rank placed the bank in the top 13 percent of depository institutions. According to 2010 peer HMDA data, Huntington is ranked 11th in overall home mortgage lending among over 425 mortgage lenders. With a 1.1 percent market share, Huntington ranked 20th of 311 home purchase lenders, which is equivalent to being in the top ten percent of lenders. Collectively, the top five home purchase lenders had 41 percent of the total market share. With a 1.0 percent market share, the bank ranked 18th of 136 home improvement lenders, which is equivalent to being in the top 13 percent of lenders. Collectively, the top five home improvement lenders had 56 percent of the total market share. With a 2.2 percent market share, Huntington ranked ninth of 362 home refinance lenders, which is equivalent to being in the top five percent of lenders. Collectively, the top five home refinance lenders had 41 percent of market share. According to 2010 peer small business data, Huntington ranked eighth of 89 business lenders with a 3.4 percent market share. This rank placed the bank in the top ten percent of small business lenders. Collectively, the top five small business lenders had 38 percent of market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good. The bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is good. Refer to Tables 2, 3, 4, and 5 in the Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. We also considered that there are relatively limited opportunities for mortgage lending in low-income geographies, as only 1.2 percent of the area's owner-occupied housing units located in those census tracts. Therefore, conclusions are based primarily on lending in moderate-income tracts.

The geographic distribution of home purchase loans is excellent in the Pittsburgh AA. The percentage of loans originated/purchased in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units located in those neighborhoods. The percentage of loans originated/purchased in low-income geographies was below the percentage of owner-occupied housing units in those neighborhoods. Huntington did not achieve a 2010 market share in low-income geographies. The bank's market share in moderate-income geographies significantly exceeded its overall home purchase market share.

The geographic distribution of home improvement loans is excellent. The percentage of loans originated/purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those neighborhoods. The percentage of loans in low-income geographies was below the percentage of owner-occupied housing units in those areas. The bank did not achieve a market share in low-income geographies. Huntington's 2010 home purchase market share in moderate-income geographies significantly exceeded its overall home purchase market share for the AA.

The geographic distribution of home refinance loans is good, when considering the bank's market share performance. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied housing units located in those neighborhoods. The percentage of loans was well below the percentage of owner-occupied housing units in low-income geographies. However, Huntington's 2010 home refinance market share in both low-income and moderate-income geographies significantly exceeded its overall home refinance market share for the area.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is good. The percentage of loans in low-income geographies was near the percentage of businesses located in those parts of the AA. The percentage of loans in moderate-income geographies exceeded the corresponding

percentage of businesses located there. Huntington's 2010 small business market share in low-income areas was near its overall small business market share for the area. Huntington's 2010 small business market share in moderate-income geographies significantly exceeded its overall small business market share for the area.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in the Pittsburgh AA.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans is excellent. As stated earlier, the bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

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

The borrower distribution of home purchase loans is excellent. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was below the percentage of low-income families in the AA, performance was good considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 market shares to low-income borrowers and moderate-income borrowers significantly exceeded its overall home purchase market share for the AA.

The borrower distribution of home improvement loans is excellent. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was somewhat below the percentage of low-income families in the AA, performance was excellent considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home improvement market share to moderate-income borrowers was below its overall home improvement market share for the AA. Huntington's 2010 home improvement market share to low-income borrowers significantly exceeded its overall home improvement market share for the AA.

The borrower distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 market share for moderate-income borrowers significantly exceeded its overall home refinance market share for the AA. Huntington's 2010 market share for low-

income borrowers significantly exceeded its overall home refinance market share for the AA. This market share performance further supports the overall good conclusion.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is excellent in the Pittsburgh AA. The percentage of loans to businesses with revenues of \$1 million or less exceeded the percentage of area businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses with revenues of \$1 million or less significantly exceeded its overall small business market share for the AA.

Community Development Lending

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

Community development lending is excellent and had a significant positive impact on lending performance in the Pittsburgh AA. During the evaluation period the bank originated 22 CD loans totaling \$52.3 million, representing 22 percent of allocated Tier One Capital allocated to the AA.

The CD loans reflect adequate responsiveness, and served a variety of CD purposes including affordable housing, community services targeted to low- and moderate-income individuals, and revitalization and stabilization of low- and moderate-income geographies, all of which are identified needs in the AA. For example, the bank originated two land development loans totaling \$14.5 million in support of the re-development of a low- and moderate-income Pittsburgh corridor. The plan for this mixed-use development includes residential apartments (106 units), a hotel, and other office space, each of which will create jobs for low- and moderate-income individuals and attract businesses to the area to utilize the available office space. The development has also been incorporated into the local neighborhood community development corporation's long-term plans for the area.

Other Pennsylvania CD Loans

Huntington also made five CD loans totaling \$5.4 million in greater Pennsylvania statewide area that did not benefit any particular AA. These are reflected as "PA Statewide" on Table 1. The loans support affordable housing initiatives. As the bank has adequately addressed the CD needs of its AAs in the state, we also considered the impact of these out-of-area CD loans.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Considering the size of the AA and volume of overall lending performed, the activity under flexible programs has a neutral impact on lending performance in the Pittsburgh AA.

Huntington participates in a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, over 400 loans were made to low- or moderate income borrowers and/or to borrowers located in low- or moderate-income parts of the Pittsburgh AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Erie AA and the Lawrence County AA is weaker than the bank's overall "Outstanding" performance in Pennsylvania due to weaker geographic distribution performance. This weaker performance did not have a material impact on the lending test rating for Pennsylvania. Refer to the Tables 1 through 13 in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Pennsylvania is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Pittsburgh AA is adequate. Refer to Table 14 in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Huntington made 77 investments totaling \$14.9 million, or six percent of allocated Tier One Capital. This level of investment activity is reasonable in relation to the bank's operations in the area and is considered adequate. Investments were adequately responsive to the identified affordable housing and other community development needs of the AA. These investments were comprised primarily of a \$7.9 million investment in mortgage-backed security backed by mortgage loans to low- and moderate-income borrowers from the AA, and \$6.7 million in low-income housing tax credit funds supporting affordable housing projects within the local community. Two of the investment funds are single-investor funds where Huntington is the sole investor and is directly involved in the financing plans of the projects. Furthermore, Huntington made contributions to 44 community development organizations totaling approximately \$293 thousand for affordable housing, community development services for low- and moderate-income people, economic development, and efforts to revitalize and stabilize low- and moderate-income parts of the AA. .

Other Pennsylvania Investments

Huntington also made qualified investments totaling \$140 thousand for affordable housing purposes in greater Pennsylvania statewide area that did not benefit any particular AA. They

are reflected as “PA Statewide” on Table 14. These investments further demonstrate the bank’s commitment to community development initiatives. As the bank has adequately addressed the CD needs of its AAs in the state, we also considered the impact of these out-of-area investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the investment test in the Erie AA and Lawrence County AA is weaker than the bank’s overall “Low Satisfactory” performance under the investment test in Pennsylvania. The weaker performance was due to lower investment volumes. Limited-scope performance did not have an impact on the investment test rating in the state. Refer to the Table 14 in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the service test in Pennsylvania rated “Outstanding.” Based on a full-scope review, the bank’s performance in the Pittsburgh AA is excellent.

Retail Banking Services

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

Huntington’s branches are readily accessible to geographies and individuals of different income levels in the AA. Systems for delivering retail banking services are excellent. The bank operates 44 offices in the area. The percentage of offices located in low- income census tracts is commensurate with the portion of the population living in those areas. The percentage of offices located in moderate-income census tracts exceeded the portion of the population living in moderate-income geographies. Branch openings and closings generally did not adversely affect the accessibility of retail banking services to low- or moderate-income geographies or individuals. Huntington entered the Pittsburgh market when Sky Financial was acquired. In addition, Huntington opened two and closed two branches, including one closure in a moderate-income geography. Branch closures were based on a reduction in business activity.

Branch office hours and the level of services available do not vary in a way that inconveniences any portions of the bank’s AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, the majority of branches offer Saturday hours. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington’s ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 77 full-service ATMs within the AA, including those at off-premise locations.

Community Development Services

Huntington has provided an excellent level of CD services in relation to its presence in the market, including programs for affordable housing, social services targeted to low- and moderate-income individuals, and financial literacy programs. Three hundred and thirty-five Huntington employees donated a total of 2,755 hours of CD service during the evaluation period. Officers and employees have used their financial expertise as members of director boards and leading project committees. Huntington has been responsive to community needs, including needs for affordable housing, economic development, small business development, and financial literacy. Some examples of CD services performed in this AA during the evaluation period are:

- Employees have actively worked with a local nonprofit community coalition to provide financial training and credit service information to low- and moderate-income members of the community. One example is an employee was also a member of the anti-predatory lending advisory committee.
- Huntington employees have served in leadership positions and provided financial technical assistance to a Community Development Financial Institution. Employees have also served on the organization's loan review committee for small business loans.
- Technical assistance was provided to a nonprofit housing organization to prepare an Affordable Housing Program grant application to the Federal Home Loan Bank. The application resulted in a grant to support an affordable housing program.
- Huntington created a Home Saver Solutions team to inform distressed homeowners of options available to help keep their homes. Six outreach events were held in this AA.
- The bank has partnered with a housing services organization to provide first-time homebuyer and home-maintenance counseling for low- and moderate-income clients. Huntington employees have served on the board's finance committee and developed loan application and underwriting standards.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Erie and Lawrence County AAs is not inconsistent with the bank's overall "Outstanding" performance under the service test in Pennsylvania. Refer to Table 15 for the state of Pennsylvania in appendix D for the facts and data that support these conclusions.

State Rating

State of West Virginia

CRA Rating for West Virginia¹⁰: Satisfactory
The lending test is rated: High Satisfactory
The investment test is rated: Low Satisfactory
The service test is rated: Outstanding

The major factors that support this rating:

- The geographic distribution of loans is good. Mortgage performance is good, and small loans to business performance is adequate.
- The borrower distribution of loans is good. Mortgage performance is good, and small loans to business performance is excellent.
- Qualified investment activity is adequate overall. While good in the Charleston full-scope area where investments are particularly responsive to the affordable housing needs of the AA, weaker performance in limited-scope AAs negatively affected the rating for West Virginia.
- The accessibility of Huntington's delivery systems to geographies and individuals of different income levels is excellent. The provision of CD services is generally good.

Description of Institution's Operations in West Virginia

Huntington has 32 offices within the state of West Virginia, offering its full range of residential, consumer, and commercial financial products and services. This is one of the bank's smaller rating areas. With deposits totaling \$1.8 billion, this state represents approximately four percent of the bank's deposits and five percent of reported AA loans.

Huntington has five AAs in West Virginia, with offices located in the Charleston MSA, Morgantown MSA, Huntington MSA, Parkersburg MSA, and a non-MSA area comprised of Harrison, Lewis, Marion, Randolph, and Ritchie counties. While none of the AAs represents a majority of the bank's operations in the state, the Charleston MSA is the bank's primary market area.

Please refer to the market profile for the state of West Virginia in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review. Refer to appendix A for the counties that comprise the limited scope AAs.

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

Scope of Evaluation in West Virginia

The Charleston AA was selected for a full-scope review. With deposits totaling \$593 million, this area represents 34 percent of its West Virginia deposits and 27 percent of reported AA loans in West Virginia. Performance in the Huntington, Morgantown, Parkersburg, and West Virginia Non-MSA AAs was assessed using limited-scope procedures. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

West Virginia ratings are based primarily on conclusions reached for performance in the Charleston AA where we used full-scope procedures. In drawing conclusions relative to the bank's performance, we took into consideration community information obtained by the OCC and the bank, and met with members of the local community in the full-scope AA. In the Charleston AA, we met with a community action organization and a social services organization. Refer to the market profile in appendix C for community information, including identified needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Huntington's lending activity is good in the Charleston AA. Considering market rankings and market shares, lending is generally commensurate with the bank's local deposit presence, especially when considering the large number of lenders operating in the area.

June 30, 2011 FDIC deposit information reflects that Huntington ranked third in deposits among 16 depository institutions with an 11.4 percent share of the market. According to 2010 peer HMDA data, Huntington ranked sixth in overall home mortgage lending among over 150 mortgage lenders. Huntington ranked sixth out of 116 home purchase lenders with a 5.6 percent market share. Collectively, the top five home purchase lenders had 42 percent of the total market share. The bank ranked fourth of 27 lenders in home improvement lending with a 6.6 percent market share. Collectively, the top five home improvement lenders had 78 percent of the total market share. Huntington ranked fifth of 119 lenders in home refinance lending with a 6.9 percent market share. Collectively, the top five home refinance lenders had 44 percent of the total market share. According to 2010 peer small business data, Huntington ranked fourth of 39 business lenders with a 7.9 percent share of the market. Collectively, the top five small business lenders had 51 percent of market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good. The bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is good. Refer to Tables 2, 3, 4, and 5 in the West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. We also considered that there are very limited opportunities for mortgage lending in low-income geographies. Less than 100 owner-occupied housing units located are located in the one low-income census tract. Therefore, conclusions are based primarily on lending in moderate-income tracts.

The geographic distribution of home purchase loans is good in the Charleston AA, when considering the bank's loan performance to demographics in geographies with very limited opportunities. The percentage of loans originated/purchased in moderate-income areas was below the percentage of owner-occupied housing units located in those neighborhoods. While lending levels are not significant in the low-income areas and there are few opportunities to lend, it is noted that the percentage of loans in low-income areas exceeded the percent of owner-occupied housing located in those neighborhoods. Huntington's 2010 home purchase market share in moderate-income areas significantly exceeded its overall home purchase market share for the area. The bank did not achieve a market share in low-income geographies.

The geographic distribution of home improvement loans is very poor. The percentage of loans originated/purchased in moderate-income geographies was significantly below the percentage of owner-occupied housing units located in those neighborhoods. No loans were originated/purchased in low-income geographies. Huntington did not record a 2010 market share in low- or moderate-income geographies for home improvement loans.

The geographic distribution of home refinance loans is good, when considering the bank's market share performance and loan performance to demographics in geographies with very limited opportunities. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied housing units located in those neighborhoods. While lending levels were not significant in the low-income geographies and there are few opportunities to lend, it is noted that the percentage of Huntington's loans in low-income geographies exceeded the percent of owner-occupied housing located in those neighborhoods. The bank's 2010 home refinance market share in low-income geographies significantly exceeded the bank's overall home refinance market share. Huntington's 2010 home refinance market share in moderate-income geographies significantly exceeded its overall home refinance market share for the area.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is adequate. The percentage of loans in moderate-income geographies significantly exceeded the percentage of businesses located in those parts of the AA. The percentage of loans in low-income geographies was well below the corresponding percentage of businesses located there. Huntington's 2010 small business

market share in moderate-income areas significantly exceeded its overall small business market share for the area. Huntington's 2010 small business market share in low-income geographies was well below its overall small business market share for the area.

Lending Gap Analysis

We analyzed Huntington's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in the Charleston AA.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans is good. As stated earlier, the bank did not originate or purchase a sufficient volume of small loans to farms to perform a meaningful analysis.

Home Mortgage Loans

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

The borrower distribution of home purchase loans is good. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was well below the percentage of low-income families in the AA, performance was adequate considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 market shares to low-income borrowers and moderate-income borrowers significantly exceeded its overall home purchase market share for the area.

The borrower distribution of home improvement loans is good. The percentage of loans to moderate-income borrowers was near the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was below the percentage of low-income families in the AA, performance was good considering the impact the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 home improvement market share to moderate-income borrowers was somewhat near its overall home improvement market share for the AA. Huntington's 2010 home improvement market share to low-income borrowers was well below its overall home improvement market share for the AA.

The borrower distribution of home refinance loans is adequate. The percentage of loans to moderate-income borrowers was below the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers was significantly below the percentage of low-income families in the AA, performance was poor considering the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. Huntington's 2010 market share for moderate-income borrowers is near its overall home refinance market share for the area. Huntington's 2010 market share for low-income borrowers exceeded its overall home refinance market share for the area. This market share performance further supported the overall adequate conclusion.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is excellent in the Charleston AA. The percentage of loans to businesses with revenues of \$1 million or less exceeded the percentage of area businesses that have revenues of \$1 million or less. Huntington's 2010 market share of small loans to businesses with revenues of \$1 million or less significantly exceeded its overall small business market share for the area.

Community Development Lending

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

Community development lending is adequate and had a neutral impact on the lending performance for the Charleston MSA. During the evaluation period, Huntington originated four community development loans totaling \$2.8 million, or five percent of allocated Tier One Capital. The loans were primarily to organizations and entities that provide services to low- and moderate-income individuals and families, and were responsive to community needs.

Other West Virginia CD Loans

Huntington also made three CD loans totaling \$932 thousand in the greater West Virginia statewide area that did not benefit any particular AA. They are reflected as "WV Statewide" on Table 1. The loans support affordable housing, economic development, and community service initiatives. As the bank has adequately addressed the CD needs of its AAs in the state, we also considered the impact of these out-of-area CD loans.

Product Innovation and Flexibility

Huntington offers and participates in flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Considering the size of the AA and volume of overall lending performed, the activity under flexible programs has a positive impact on lending performance in the Charleston AA.

Huntington participates in a variety of national, state, and locally-based flexible lending programs, including those associated with the Federal Housing Administration, Veterans Administration, Federal Home Loan Bank, and Fannie Mae. During the evaluation period, nearly 200 loans were made to low- or moderate income borrowers and/or to borrowers located in low- or moderate-income parts of the Charleston AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Morgantown, Parkersburg, and the West Virginia Non-MSA AAs is not inconsistent with the bank's overall High Satisfactory performance under the lending test in West Virginia. In the Huntington AA, the bank's performance is stronger than the bank's overall performance in the state due to a relatively higher level of CD lending. Overall, the performance did not materially affect the lending test rating for West Virginia. Refer to the Tables 1 through 13 in the state of West Virginia section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in West Virginia is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Charleston AA is good. Weaker performance in the combined limited-scope areas had a negative impact on the state rating. Refer to Table 14 in the state of West Virginia section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Huntington made 29 investments totaling \$5.0 million in the Charleston AA. The bank's level of investment activity at eight percent of allocated Tier One Capital is good in relation to the bank's operations in the AA. Investments demonstrated excellent responsiveness to the identified CD needs of the AA particularly to the affordable housing needs of the area. The investments were comprised primarily of a \$4.8 million investment in a single-investor low-income housing tax credit fund supporting affordable housing projects within the local community. Huntington is the only investor in this fund and is directly involved in project financing plans. Other investments included participation in three affordable housing Community Equity Fund Limited Partnership (CEF) funds administered by the Community Affordable Housing Equity Corporation, and a mortgage-backed security backed by residential mortgage loans to low- and moderate-income borrowers from the AA. Huntington also made contributions to 13 community development organizations totaling approximately \$54 thousand for affordable housing and community development services for low- and moderate-income people. Prior period investments that remain outstanding total \$58 thousand and consist of additional investments in CEF funds.

Other West Virginia Investments

Huntington also made qualified investments totaling \$1.6 million for affordable housing purposes in the greater West Virginia statewide area that did not benefit any particular AA. These investments are reflected as "WV Statewide" on Table 14. These investments further demonstrate the bank's commitment to community development initiatives. As the bank has adequately addressed the CD needs of its AAs in the state, we also considered the impact of these out-of-area investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Huntington AA is stronger than the "Low Satisfactory" performance under the investment test

in West Virginia, as reflected by a higher level of qualified investments. This is one of the smallest Huntington AAs in the state. In the Morgantown, Parkersburg, and West Virginia non-MSA, AAs the bank's performance is weaker than the bank's overall performance in the state, as reflected by lower levels of qualified investments. Together, these three AAs represent 59 percent of the bank's deposits in West Virginia, negatively affecting the Investment Test rating for the state. Refer to the Table 14 in the state of West Virginia 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 West Virginia is rated "Outstanding." Based on a full-scope review, the bank's performance in the Charleston AA is excellent.

Retail Banking Services

Refer to Table 15 in the state of West Virginia 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.

Huntington's branches are readily accessible to geographies and individuals of different income levels in the Charleston AA. Systems for delivering retail banking services are excellent. The bank operates eight offices in the area. The percentages of offices located in low- income and moderate-income census tracts exceeded the portion of the population living in those areas. No offices were opened or closed in the AA during the evaluation period.

Weekday branch office hours and the level of services available do not vary in a way that inconveniences any portions of the bank's AA, including low- and moderate-income geographies. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. In addition to offering Monday through Friday banking hours, drive-up facilities have extended hours and Saturday hours, while some branches offer Saturday lobby hours as well. Branch personnel are also available for appointments outside the standard service hours. In addition, Huntington's ATM network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. Huntington operates 36 full-service ATMs within the AA, the majority of which are located in off-site locations.

Community Development Services

Huntington has provided a level of CD services that is good, considering its presence in the market. Sixteen Huntington employees donated 285 hours of community development service during the evaluation period. Officers and employees have used their financial expertise as members of director boards and leading project committees. Huntington has been responsive to community needs, including needs for affordable housing, economic development, supportive services and job training for low- and moderate-income individuals, and financial education. Some examples of CD services performed in this AA during the evaluation period are:

- An employee provided a local housing organization with technical assistance while serving on its planning board. The organization provides housing for low- and moderate-income residents by offering public housing and rental assistance or Section 8 allowing the tenant to find their own housing.
- An employee provided financial service education to low- and moderate-income persons while working in conjunction with a local housing development organization.
- An employee provided financial expertise and leadership to a community development organization that promotes small business economic development, business district revitalization, and job creation for low- and moderate-income individuals in the area.
- Huntington employees provided technical assistance to a local organization that operates a homeless shelter and provides transitional housing. One employee served on the organization's board and assisted in fundraising and marketing. Another employee served on the finance committee.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Huntington, Parkersburg, and West Virginia Non-MSA AAs is not inconsistent with the bank's overall "Outstanding" performance under the service test in West Virginia. The bank's performance in the Morgantown MSA AA is weaker than overall performance in the state, due to weaker branch distribution. Refer to Table 15 in the state of West Virginia section of appendix D for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test including CD loans: 1/1/2007 to 12/31/2011 Investment Test: 1/1/2007 to 12/31/2011 Service Test: 1/1/2007 to 12/31/2011	
Financial Institution	Products Reviewed	
The Huntington National Bank (Huntington) Columbus, Ohio	Home mortgage loans; small loans to businesses and farms; community development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
The Huntington Community Development Corporation (HCDC)	Bank subsidiary	Qualified investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information*
State of Ohio Columbus MSA Cleveland-Elyria-Mentor MSA Akron MSA Canton-Massillon MSA Dayton MSA Lima MSA Mansfield MSA Sandusky MSA Springfield MSA Toledo MSA Ohio Non-MSA	Full Scope Full Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	Columbus- Delaware, Fairfield, Franklin, Licking, Madison, Pickaway, Union Counties Cleveland Akron- Portage, Summit Counties Canton-Stark, Carrol Counties Dayton- Montgomery, Miami, Greene Counties Lima-Allen County Mansfield- Richland County Sandusky-Erie County Springfield-Clark County Toledo- Fulton, Lucas, Ottawa, Wood Counties Ohio Non-MSA-Ashland, Ashtabula, Logan, Harrison, Defiance, Tuscarawas, Columbia, Hancock, Seneca, Scioto Sandusky, Hardin, Marion, Henry, Putnam, Paulding, Wyandot Fayette, Williams, Wayne, Muskingum, Ross Counties

* Other information includes the AA short name and counties included in the AA for non-MSA AAs and AAs where the entire MSA was not delineated.

<p>State of Michigan Detroit-Livonia-Dearborn MD Warren-Farmington Hills-Troy MD</p> <p>Grand Rapids-Wyoming MSA Cass County Holland-Grand Haven MSA Kalamazoo-Portage MSA Monroe MSA Muskegon-Norton Shores MSA Niles-Benton Harbor MSA Michigan Non-MSA</p>	<p>Full Scope Full Scope</p> <p>Full Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope</p>	<p>Detroit Warren-Troy- Macomb, Oakland Counties Grand Rapids Cass County Holland- Ottawa County Kalamazoo-Kalamazoo County Monroe-Manistee County Muskegon- Muskegon County Niles- Berrien County Michigan Non-MSA- Lenawee, Allegan, Mecosta, Oceana, Osceola, Manistee, Antrim, Charlevoix, Crawford, Emmet, Chippewa, Grand Traverse, Kalkaska, Leelanau, Montcalm Counties</p>
<p>Multistate MSAs Cincinnati-Middleton OH-KY-IN</p> <p>Weirton-Steubenville WV-OH</p> <p>Wheeling WV-OH</p> <p>Youngstown-Warren-Boardman OH-PA</p>	<p>Full Scope</p> <p>Full Scope</p> <p>Full Scope</p> <p>Full Scope</p>	<p>Cincinnati- Boone, Campbell, Kenton Counties (KY); Butler, Clermont, Hamilton, Warren Counties (OH) Weirton- Jefferson County (OH), Hancock County (WV) (evaluation start date 7/1/07) Wheeling- Belmont County (OH), Ohio County (WV) (evaluation start date 7/1/07) Youngstown (evaluation start date 7/1/07)</p>
<p>State of Florida Naples-Marco Island MSA</p>	<p>Full Scope</p>	<p>Naples</p>
<p>State of Indiana Indianapolis MSA</p> <p>Anderson MSA Fort Wayne MSA</p> <p>Lafayette MSA</p>	<p>Full Scope</p> <p>Limited Scope Limited Scope</p> <p>Limited Scope</p>	<p>Indianapolis- Boone, Hamilton, Johnson, Marion Counties Anderson- Madison County Fort Wayne- Allen County (evaluation start date 7/1/07) Lafayette- Tippecanoe County</p>
<p>State of Pennsylvania Pittsburgh MSA</p> <p>Erie MSA Lawrence County</p>	<p>Full Scope</p> <p>Limited Scope Limited Scope</p>	<p>Pittsburgh- Allegheny, Beaver, Butler, Washington, Westmoreland Counties (evaluation start date 7/1/07) Erie (evaluation start date 7/1/07) Lawrence County (evaluation start date 7/1/07)</p>
<p>State of West Virginia Charleston MSA Huntington MSA Morgantown MSA Parkersburg MSA West Virginia Non-MSA</p>	<p>Full Scope Limited Scope Limited Scope Limited Scope Limited Scope</p>	<p>Charleston- Kanawha, Putnam Counties Huntington-Cabell, Wayne Counties Morgantown- Monongalia County Parkersburg-Wood County West Virginia Non-MSA-Randolph, Ritchie, Marion, Harrison, Lewis Counties</p>

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

The Huntington National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
The Huntington National Bank	Outstanding	High Satisfactory	High Satisfactory	Satisfactory**
Multistate Metropolitan Area or State:				
State of Ohio (primary rating area)	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State of Michigan (primary rating area)	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Cincinnati-Middleton OH-KY-IN	Outstanding	Outstanding	Low Satisfactory	Outstanding
Weirton-Steubenville WV-OH	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Wheeling WV-OH	Outstanding	Outstanding	High Satisfactory	Outstanding
Youngstown-Warren-Boardman OH-PA	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State of Florida	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Indiana	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Pennsylvania	Outstanding	Low Satisfactory	Outstanding	Outstanding
State of West Virginia	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory

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

(**) While the bank's performance under the Lending Test, Investment Test and Service Test as noted in the table would have been an outstanding rating, the overall CRA rating was lowered from outstanding to satisfactory as discussed within the Fair Lending and Other Illegal Credit Practices section of this document.

Appendix C: Market Profiles for Full-Scope Areas

Primary Rating Areas

- State of Ohio – Columbus MSA (Columbus AA)
- State of Ohio – Cleveland-Elyria-Mentor MSA (Cleveland AA)
- State of Michigan – Detroit-Livonia-Dearborn Metropolitan Division (Detroit AA)
- State of Michigan – Warren-Farmington Hills-Troy Metropolitan Division (Warren-Troy AA)
- State of Michigan – Grand Rapids-Wyoming MSA (Grand Rapids AA)

Other Rating Areas

- Cincinnati-Middleton, OH-KY-IN Multistate MSA (Cincinnati AA)
- Weirton-Steubenville, WV-OH Multistate MSA (Weirton AA)
- Wheeling, WV-OH Multistate MSA (Wheeling AA)
- Youngstown-Warren-Boardman, OH-PA Multistate MSA (Youngstown AA)
- State of Florida - Naples-Marco Island MSA (Naples AA)
- State of Indiana – Indianapolis MSA (Indianapolis AA)
- State of Pennsylvania – Pittsburgh MSA (Pittsburgh AA)
- State of West Virginia – Charleston MSA (Charleston AA)

State of Ohio

Columbus, OH MSA (18140)

Demographic Information for Full-Scope Area: Columbus Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	379	9.23	26.65	39.05	24.80	0.26
Population by Geography	1,581,066	6.60	22.56	42.13	28.47	0.23
Owner-Occupied Housing by Geography	391,666	2.94	17.51	45.74	33.81	0.00
Businesses by Geography	171,075	5.96	16.78	40.05	37.21	0.00
Farms by Geography	4,916	1.28	9.50	60.60	28.62	0.00
Family Distribution by Income Level	404,868	19.39	18.38	23.09	39.13	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	152,947	10.99	33.37	42.33	13.31	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below the Poverty Level	54,708 68,600 10%	Median Housing Value Unemployment Rate (annual unadjusted - 2011 Bureau of Labor Statistics)			120,052 7.5%	

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

Source: 2000 US Census and 2010 HUD updated MFI

The Columbus AA consists of Delaware, Fairfield, Franklin, Licking, Madison, Pickaway, and Union Counties in Ohio. This is the portion of the Columbus MSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

Huntington has 77 branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$10.3 billion in deposits in the area, which ranked first in size with a 24.2 percent share of the insured deposit market. Competition is strong as there are 54 insured institutions operating over 560 offices in an area with a population of 1.6 million. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 400 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include JPMorgan Chase, PNC Bank, and Fifth Third Bank.

The City of Columbus is the primary city in the AA. It is also the capital of Ohio, and the largest city in the state by population. The AA has a diverse economy across industries such as government, education, financial services, healthcare, retail trade, and manufacturing. Major employers include Ohio State University, JPMorgan Chase, Nationwide Insurance, Ohio Health, Honda of America Manufacturing, Limited Brands, and Huntington Bancshares.

The economic recession that occurred during the evaluation period caused negative demographic trends, including declining incomes and home valuations and an increase in home foreclosures. While the area was not impacted to the extent that other parts of the state were, the opportunity to lend was impacted. Housing permits and starts declined by approximately 50 percent between 2006 and 2010. Median housing prices in the AA at the beginning and end of the evaluation period were \$157 thousand and \$145 thousand, respectively. The MSA's unemployment rate increased during the evaluation period. The annual unadjusted unemployment rate rose from 4.7 percent in 2006 to 8.7 percent in 2010 before falling to 7.5 percent in 2011. In comparison, the annual unadjusted unemployment rate for Ohio increased from 5.4 percent in 2006 to 10.1 percent in 2009 before dropping to 8.6 percent in 2011.

The City of Columbus has identified several areas for redevelopment and has programs offering tax incentives and other subsidies to encourage the development of housing and businesses in those areas. There are numerous opportunities to collaborate with various community development agencies and organizations addressing housing, economic, and social issues within the AA. Some of the groups are focused on specific neighborhoods, and others are city wide, regional, or state organizations. Community information, including information obtained from contacts with local organizations made by the OCC, reflects that affordable housing is a significant need in the area. The City of Columbus has a high percentage of multifamily housing, and there are a number of ongoing projects in vacant and blighted neighborhoods funded by grants from HUD's Neighborhood Stabilization Program. Nearly two-thirds of the housing stock in Franklin County is aged, reflecting a significant volume of housing in need of rehabilitation to bring it up to contemporary living standards. Other identified needs include neighborhood revitalization programs, small business start up loans for local entrepreneurs, loan modifications to prevent foreclosures, and financial literacy, homebuyer and homeownership education programs. There is a need for additional economic development to create and retain jobs and attract more businesses to neighborhoods and the central city. Supporting services such as job training, job placement, youth programs, child care, and expanded neighborhood health care provider network are also identified community needs.

Cleveland-Elyria-Mentor, OH MSA (17460)

Demographic Information for Full-Scope Area: Cleveland Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	693	16.02	20.06	38.82	23.81	1.30
Population by Geography	2,148,143	9.74	16.77	43.79	29.67	0.03
Owner-Occupied Housing by Geography	580,878	4.83	12.41	48.22	34.54	0.00
Businesses by Geography	190,231	6.40	13.31	40.66	38.74	0.89
Farms by Geography	4,316	1.81	6.21	52.22	39.69	0.07
Family Distribution by Income Level	562,913	20.34	18.08	22.21	39.37	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	216,274	17.82	24.67	41.67	15.84	0.00
Median Family Income						
HUD Adjusted Median Family Income for 2010	52,660					
Households Below the Poverty Level	64,800					
	11%					
			Median Housing Value			121,274
			Unemployment Rate (2011 annual unadjusted - Bureau of Labor Statistics)			7.7%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2010 HUD updated MFI

The Cleveland AA consists of Cuyahoga, Geauga, Lake, Lorain and Medina counties in Ohio, which is also the entire Cleveland-Elyria-Mentor MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

Huntington has 80 branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$4.1 billion in deposits in the area, which ranked fifth in size with an 8.0 percent share of the insured deposit market. Competition is strong as there are 43 insured institutions operating over 700 offices in an area with a population of 2.1 million. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, nearly 400 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include Key Bank, PNC Bank, Third Federal Savings and Loan, and RBS Citizens.

The City of Cleveland is the primary city in the AA. Cleveland is the second largest city in Ohio based on population, although the population has been declining and was below 400,000 as of the end of the evaluation period. While manufacturing remains a primary industry in the region, the services industry is becoming more prominent.

The local economy includes employment concentrations in government, financial services, healthcare, and manufacturing. Major employers include the Cleveland Clinic, University

Hospitals Health System, Progressive Corp., KeyCorp, Ford Motor Company, and Sherwin-Williams Company.

The economic recession that occurred during the evaluation period caused continued population declines that have contributed to negative demographic trends, including declining incomes and home valuations and an increase in home foreclosures. These items affected the opportunity to lend in the area. Housing permits and starts declined by approximately 50 percent between 2007 and 2010. Median housing prices in the AA at the beginning and end of the evaluation period were \$151 thousand and \$128 thousand, respectively. The MSA's unemployment rate increased during the evaluation period. The annual unadjusted unemployment rate rose from 5.5 percent in 2006 to 8.8 percent in 2009 before falling to 7.7 percent in 2011. In comparison, the annual unadjusted unemployment rate for Ohio increased from 5.4 percent in 2006 to 10.1 percent in 2009 before dropping to 8.6 percent in 2011.

There are opportunities to collaborate with various community development agencies and organizations in the area, including serving on boards and committees, providing internships, and sponsoring programs. Community information, including information obtained from contacts with local organizations made by the OCC, reflects that affordable housing is a significant need in the area. A significant portion of Cleveland's housing stock is aged and in need of rehabilitation. There is also a significant portion of the housing stock that is vacant. Although housing costs in Cleveland are relatively inexpensive, the most critical housing needs are a direct result of poverty. A significant portion of the city's population cannot afford the cost of standard quality housing. There is a need for additional public housing, as well as permanent supportive housing for individuals and families including those that are elderly and persons with mental and physical disabilities. Other identified community development needs include job creation, quality education, and training; access to development capital, and small business loans; financial literacy training and credit counseling, and; low-fee checking and savings accounts.

State of Michigan

Detroit-Livonia-Dearborn, MI MD (19804)

Demographic Information for Full-Scope Area: Detroit Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	620	11.45	30.65	30.81	25.81	1.29
Population by Geography	2,061,162	7.80	30.49	33.77	27.85	0.09
Owner-Occupied Housing by Geography	511,936	3.81	22.11	38.26	35.82	0.00
Businesses by Geography	138,796	5.34	21.67	35.29	37.30	0.40
Farms by Geography	2,263	3.36	16.79	41.45	38.31	0.09
Family Distribution by Income Level	514,979	23.09	16.60	19.31	41.01	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	204,384	12.63	42.64	31.52	13.22	0.00
Median Family Income		Median Housing Value				
HUD Adjusted Median Family Income for 2010	48,792		Unemployment Rate (2011 annual unadjusted - Bureau of Labor Statistics)		102,841	
Households Below the Poverty Level	55,900				12.6%	
	15%					

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

Source: 2000 US Census and 2010 HUD updated MFI

The Detroit AA consists of the Detroit-Livonia-Dearborn Michigan MD. The area is comprised of Michigan's Wayne County. This is one of the two interrelated MDs that share economic benefits and challenges while comprising the Detroit-Warren-Livonia MSA (19820). The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and moderate-income geographies.

Huntington has 10 branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$271.7 million in deposits in the area, which ranked ninth in size with a 0.8 percent share of the insured deposit market. Competition is strong as there are 28 insured institutions operating nearly 400 offices in an area with a population of 2.1 million. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 325 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include JPMorgan Chase, Comerica Bank, Bank of America, and PNC Bank.

The City of Detroit is the primary city within the AA and the largest city in Michigan. While the local economy is centered in the automotive industry, diversification has occurred. Major employers include General Motors, Henry Ford Health System, Detroit Medical Center, Wayne State University, Compuware, as well as various governmental units. The economic recession significantly affected the Detroit metropolitan region and Michigan, which impacted the

opportunity to lend in the area. Housing values declined significantly. Median housing prices in the AA at the beginning and end of the evaluation period were \$176 thousand and \$116 thousand, respectively. The City of Detroit has high levels of abandoned housing units and some of the highest levels of foreclosures in the country. Unemployment rates for the Detroit metropolitan area and Michigan were among the highest in the country during portions of the evaluation period. For the MSA as a whole, the annual unadjusted unemployment rate rose from 7.2 percent in 2006 to 15.0 percent in 2009 after peaking at 16.9 percent in July 2009. The rate has since slowly declined to the annual rate of 11.5 percent in 2011. The MD's unemployment rate peaked at 18.2 percent in July 2009 before slowly declining. Regardless, the annual unadjusted rate for the MD for 2011 was still very high at 12.6 percent. The annual unadjusted unemployment rate for the state of Michigan increased from 6.9 percent in 2006 to 13.4 percent in 2009 before declining to 10.3 percent in 2011.

There are a variety of community groups addressing housing, economic, and social issues within the AA, including those that focus on specific neighborhoods and those that work on a wider scale. There are opportunities to support organizations through financial contributions, as well as supporting programs for affordable housing, neighborhood revitalization, economic development, and financial education. Community information, including information obtained from contacts with local organizations made by the OCC reflect there are needs for affordable housing related loan programs, foreclosure prevention programs, and neighborhood revitalization through acquisition and rehabilitation of foreclosed properties. Streamlined ways to acquire properties and facilitate short-term sales to help borrowers avoid foreclosure are needed. The City of Detroit has a housing stock that includes many vacant and abandoned structures that need demolition, and infrastructure improvements are needed in various parts of the AA. Support for social services is needed for low- and moderate-income individuals and families, including the homeless and the elderly. Additional financial education, home ownership counseling, and foreclosure prevention counseling are also identified needs of the AA.

Warren-Farmington Hills-Troy, MI MD (47644)

Demographic Information for Full-Scope Area: Warren-Troy Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	543	2.21	19.89	49.91	27.62	0.37
Population by Geography	1,982,305	1.86	19.57	50.75	27.80	0.02
Owner-Occupied Housing by Geography	596,129	0.85	18.11	51.58	29.46	0.00
Businesses by Geography	221,150	1.89	16.14	49.22	32.61	0.15
Farms by Geography	4,500	1.91	16.16	56.27	25.67	0.00
Family Distribution by Income Level	528,770	18.03	18.20	23.57	40.21	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	191,549	3.41	29.96	52.13	14.50	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below the Poverty Level	67,923 79,600 6%	Median Housing Value Unemployment Rate (2011 annual unadjusted - Bureau of Labor Statistics)			167,345 10.8%	

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

Source: 2000 US Census and 2010 HUD updated MFI

The Warren-Troy AA consists of Michigan's Oakland and Macomb counties, which are north and northeast of Detroit. The area is the portion of the Warren-Farmington Hills-Troy, MI MD where the bank has offices. This is one of the two interrelated MDs that share economic benefits and challenges while comprising the Detroit-Warren-Livonia MSA (19820). The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and moderate-income geographies.

Huntington has 45 branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$3.6 billion in deposits in the area, which ranked sixth in size with a 7.2 percent share of the insured deposit market. Competition is strong as there are 38 insured institutions operating nearly 650 offices in an area with a population of nearly 2 million. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 400 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include Bank of America, Comerica Bank, PNC Bank, and JPMorgan Chase.

The AA is primarily metropolitan in nature. Two of the primary cities in the AA are Warren and Troy. While the local economy is centered in the automotive industry, the area has become more diversified. Major employers include General Motors, Chrysler Group, William Beaumont Hospital, and U.S. Army TACOM. The economic recession significantly affected the Detroit

metropolitan region and Michigan, which affected the opportunity to lend in the area. Housing values declined significantly and high rates of home foreclosures occurred. Median housing prices in the AA at the beginning and end of the evaluation period were \$170 thousand and \$118 thousand, respectively. Unemployment rates for the Detroit metropolitan area and Michigan were among the highest in the country during portions of the evaluation period. For the MSA as a whole, the annual unadjusted unemployment rate rose from 7.2 percent in 2006 to 15.0 percent in 2009 after peaking at 16.9 percent in July 2009. The rate has since slowly declined to the annual rate of 11.5 percent in 2011. Unemployment levels experienced by this MD were not quite as severe as that of the entire MSA. The unemployment rate peaked at 15.9 percent in July 2009 before slowly declining. Regardless, the annual unadjusted rate for the MD for 2011 was still very high at 10.8 percent. The annual unadjusted unemployment rate for the state of Michigan increased from 6.9 percent in 2006 to 13.4 percent in 2009 before declining to 10.3 percent in 2011.

There are a variety of community groups addressing housing, economic and social issues within the AA, ranging from those focused on specific neighborhoods to others working on a city, regional or state level. There are opportunities to support organizations through financial contributions, as well as supporting programs for stabilizing neighborhoods, providing financial education including foreclosure prevention, and affordable housing and rehabilitation loans. Community information, including information obtained from contacts with local organizations made by the OCC, reflects there are needs for affordable housing related programs, including down payment assistance programs, rehabilitation of existing affordable housing, construction of new infill units, and low-cost construction financing. Other needs include home repair programs, shelter and supportive services for the homeless, and housing support services for special needs populations such as the elderly and disabled. Additional financial education and foreclosure prevention counseling is needed, as well as active loan modifications programs and streamlined ways to acquire properties and facilitate short-term sales to help borrowers avoid foreclosure.

Grand Rapids-Wyoming, MI MSA (24340)

Demographic Information for Full-Scope Area: Grand Rapids Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	149	3.36	22.15	53.69	20.81	0.00
Population by Geography	683,727	2.17	19.73	56.05	22.04	0.00
Owner-Occupied Housing by Geography	181,088	1.00	15.20	58.53	25.28	0.00
Businesses by Geography	61,626	1.90	15.98	52.53	29.59	0.00
Farms by Geography	2,059	0.29	7.29	67.70	24.72	0.00
Family Distribution by Income Level	173,475	18.29	18.78	24.39	38.55	0.00
Distribution of Low- and Moderate- Income Families throughout AA Geographies	64,301	3.57	27.80	56.81	11.82	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below the Poverty Level	52,945 62,500 9%	Median Housing Value Unemployment Rate (2011 annual unadjusted - Bureau of Labor Statistics)			111,755 8.3%	

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

Source: 2000 US Census and 2010 HUD updated MFI

The Grand Rapids AA consists of Ionia, Kent, and Newaygo counties in Michigan. This is the portion of the Grand Rapids MSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

Huntington has 23 branches within the AA. June 30, 2011 deposit data reflects that Huntington had \$1.4 billion in deposits in the area, which ranked third in size with a 10.8 percent share of the insured deposit market. Competition is strong as there are 27 insured institutions operating over 230 offices in an area with a population of 684 thousand. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 275 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include Fifth Third Bank, Wells Fargo Bank, and JPMorgan Chase.

Grand Rapids is the second largest city in Michigan by population and the principal city in the AA as well as west Michigan. It is also nicknamed "Furniture City" and serves as the headquarters for some of the world's leading office furniture companies. The Grand Rapids AA is becoming more economically diverse as health care, retail, information technology, aviation, and consumer goods manufacturing have grown in prominence within the area. Major employers include Spectrum Health, Meijer Inc., Steelcase, General Motors, Johnson Controls, and Farmers Insurance Group.

The economic recession affected the area with declining incomes, housing prices, and home starts, which affected the opportunity to lend in the area. Median housing prices in the AA at the beginning and end of the evaluation period were \$162 thousand and \$137 thousand, respectively. The MSA experienced a significant increase in unemployment, although levels were not as high as those for other parts of Michigan, some of which were the highest in the country. The MSA's annual unadjusted unemployment rate rose from 5.8 percent in 2006 to 11.0 percent in 2009 before falling to 8.3 percent in 2011. In comparison, the annual unadjusted unemployment rate for Michigan increased from 6.9 percent in 2006 to 13.4 percent in 2009 before dropping to 10.3 percent in 2011.

A variety of community groups address housing, economic, and social issues within the AA. Opportunities for participation in community development exist in a wide array of programs including micro loans to small businesses, construction, and permanent financing of affordable housing, including the development and matching fund programs. Community information, including information obtained from contacts made with local organizations by the OCC, indicates that there is a significant need for affordable housing, including both owner-occupied and rental housing units. The rehabilitation of existing units and the development of new units are both needed, as well as infrastructure improvements. There are needs for micro-enterprise assistance in the form of business planning, technical assistance, and entrepreneurial training. Support services for low- and moderate income individuals, including financial literacy, credit education, credit repair, and homeowner education and counseling are also identified needs in the AA.

Cincinnati-Middleton, OH-KY-IN Multistate MSA (17140)

Demographic Information for Full-Scope Area: Cincinnati Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	451	11.09	21.95	45.01	21.06	0.89
Population by Geography	1,840,541	6.80	18.14	47.69	27.27	0.10
Owner-Occupied Housing by Geography	475,571	2.38	14.70	51.43	31.48	0.00
Businesses by Geography	176,996	4.61	14.99	47.59	32.15	0.66
Farms by Geography	4,387	1.19	10.87	59.45	28.40	0.09
Family Distribution by Income Level	481,087	18.81	18.19	22.97	40.03	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	177,994	11.53	26.72	47.58	14.18	0.00
Median Family Income		Median Housing Value				
HUD Adjusted Median Family Income for 2010	54,771	Unemployment Rate (2011 annual unadjusted - Bureau of Labor Statistics)				118,407
Households Below the Poverty Level	69,500					8.6%
	10%					

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

Source: 2000 US Census and 2010 HUD updated MFI

The Cincinnati AA consists of Butler, Clermont, Hamilton, and Warren counties in Ohio, and Boone, Campbell, and Kenton counties in Kentucky. This is the portion of the Cincinnati-Middletown multistate MSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

Huntington has 42 branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$2.1 billion in deposits in the area, which ranked fifth in size with a 3.5 percent share of the insured deposit market. Competition is strong as there are 61 insured institutions operating over 700 offices in an area with a population of less than 2 million. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 450 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include Fifth Third Bank, U.S. Bank, First Financial, and PNC Bank.

The City of Cincinnati is Ohio's third largest city by population and is the principal city for the AA. The AA has a diverse economy with major employers in the retail trade, government, financial services, health care, transportation, and manufacturing. Cincinnati is the headquarters for several FORTUNE 500 companies, including Proctor and Gamble, Kroger, and Federated Department Stores. Other major employers include the University of Cincinnati, Health Alliance of Greater Cincinnati, and Children's Hospital Medical Group.

The AA experienced deteriorating economic conditions during the evaluation period as a result of the economic recession, which affected the opportunity to lend in the area. Declining levels of housing starts, home prices, and incomes occurred. Median housing prices in the AA at the beginning and end of the evaluation period were \$158 thousand and \$144 thousand, respectively. Unemployment levels increased significantly during the evaluation period. The multistate MSA's annual unadjusted unemployment rate rose from 5.2 percent in 2006 to 9.7 percent in 2010 before falling to 8.6 percent in 2011. In comparison, the annual unadjusted unemployment rate for Ohio increased from 5.4 percent in 2006 to 10.1 percent in 2009 before dropping to 8.6 percent in 2011. The annual unadjusted unemployment rate for Kentucky increased from 5.9 percent in 2006 to 10.3 percent in 2009 before dropping to 9.5 percent in 2011.

There is a variety of community groups addressing housing, development, economic, and social issues within the AA that provide many opportunities to participate in community development initiatives. Opportunities include the construction and rehabilitation of affordable housing, the promotion of financial literacy, and support for small businesses and struggling homeowners. Community information, including information obtained from contacts with local organizations made by the OCC, reflects there are significant economic development and affordable housing related needs in the area. The rehabilitation of vacant homes in neighborhoods with high rates of foreclosure and abandonment is needed. There are needs for homeowner rehabilitation loan programs and loans with low down payment requirements, improved access to affordable rental units, supportive housing for the homeless, and additional housing options and programs for the elderly and persons with special needs. There are also needs for additional financial literacy and foreclosure avoidance programs, as well as small business initiatives including loans, technical assistance, and small business financial education.

Weirton-Steubenville, WV-OH Multistate MSA (48260)

Demographic Information for Full-Scope Area: Weirton Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	3.13	12.50	78.13	6.25	0.00
Population by Geography	106,561	1.24	8.86	83.37	6.54	0.00
Owner-Occupied Housing by Geography	33,131	0.63	5.80	86.75	6.82	0.00
Businesses by Geography	7,158	0.94	10.72	78.44	9.91	0.00
Farms by Geography	163	0.61	2.45	93.87	3.07	0.00
Family Distribution by Income Level	30,330	19.20	19.14	23.11	38.55	0.00
Distribution of Low- and Moderate- Income Families throughout AA Geographies	11,628	1.81	11.72	80.70	5.76	0.00
Median Family Income		Median Housing Value				
HUD Adjusted Median Family Income for 2010	39,497	Unemployment Rate (2011 annual unadjusted - Bureau of Labor Statistics)				62,498
Households Below the Poverty Level	49,700					11.4%
	14%					

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

Source: 2000 US Census and 2010 HUD updated MFI

The Weirton AA consists of Hancock County in West Virginia and Jefferson County in Ohio. This is the portion of the Weirton-Steubenville multistate MSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

Huntington has 11 branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$378 million in deposits in the area, and ranked first in size with a 26.1 percent share of the insured deposit market. Competition is strong as there are 12 insured institutions operating over 40 offices in an area with a population of just over 100 thousand. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 100 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include Hancock County Savings Bank, WesBanco Bank, and PNC Bank.

Weirton, West Virginia and Steubenville, Ohio are the principal cities in the AA. Both are smaller size cities located along the Ohio River. The area's primary industrial sectors are manufacturing, education, and healthcare. Major employers include Arcelor Mittal, Weirton Medical Corp., Weirton Medical Center, Wal-Mart, Franciscan University, and Trinity Hospital. The economic recession affected the area with slow income growth, and lower housing permits and prices. Median housing prices in the AA at the beginning and end of the evaluation period were \$169 thousand and \$164 thousand, respectively.

This affected the opportunity to lend in the area. Unemployment levels were high and increased during the evaluation period. The multistate MSA's annual unadjusted unemployment rate rose from 6.8 percent in 2006 to 13.1 percent in 2010 before falling to 11.4 percent in 2011. In comparison, the annual unadjusted unemployment rate for Ohio increased from 5.4 percent in 2006 to 10.1 percent in 2009 before dropping to 8.6 percent in 2011. The annual unadjusted unemployment rate for West Virginia increased from 4.5 percent in 2006 to 8.5 percent in 2010 before dropping to 8.0 percent in 2011.

Opportunities for CD initiatives are good. There are several organizations active in the community. Community information, including information obtained from contacts with local organizations made by the OCC, reflects there are a wide variety of needs in the area. Housing stock is aged and in need of improvement, including the need for rental unit rehabilitation. New housing is also needed in all income categories, including starter homes. There are general needs for affordable housing, neighborhood revitalization, economic development, infrastructure improvement, permanent supportive housing for the homeless, and job training. Other needs include small business lending, affordable home financing options, basic healthcare access for uninsured/underinsured individuals, down payment assistance, and emergency financial assistance for the unemployed.

annual unadjusted unemployment rate for Ohio increased from 5.4 percent in 2006 to 10.1 percent in 2009 before dropping to 8.6 percent in 2011. The annual unadjusted unemployment rate for West Virginia increased from 4.5 percent in 2006 to 8.5 percent in 2010 before dropping to 8.0 percent in 2011.

Opportunities for community development initiatives are good, including working with local governments and organizations. Opportunities include participation on boards and committees, providing funding for initiatives, supporting financial literacy programs, and providing technical assistance for small businesses. Community information, including information obtained from contacts with local organizations made by the OCC, reflects there are a wide variety of needs in the area that include affordable housing, as homelessness is a concern. Education programs for current and potential small business owners as well as micro loans for new start-up businesses are needed. With high rates of foreclosure experienced by the area, foreclosure counseling and credit counseling are also needed.

Youngstown-Warren-Boardman, OH-PA Multistate MSA (49660)

Demographic Information for Full-Scope Area: Youngstown Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	168	10.12	22.02	54.17	13.10	0.60
Population by Geography	602,964	4.31	15.14	62.07	18.48	0.00
Owner-Occupied Housing by Geography	176,407	2.55	11.77	64.91	20.77	0.00
Businesses by Geography	48,717	3.98	11.45	57.22	27.20	0.15
Farms by Geography	1,839	0.82	4.19	74.33	20.66	0.00
Family Distribution by Income Level	163,699	18.74	18.92	22.62	39.71	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	61,658	7.07	21.56	60.61	10.75	0.00
Median Family Income		Median Housing Value				
HUD Adjusted Median Family Income for 2010	44,378	Unemployment Rate (2011 annual unadjusted - Bureau of Labor Statistics)				79,856
Households Below the Poverty Level	53,500					9.4%
	11%					

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

Source: 2000 US Census and 2010 HUD updated MFI

The Youngstown AA consists of Trumbull and Mahoning Counties in Ohio, and Mercer County in Pennsylvania, which is the entire multistate MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

Huntington has 41 branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$1.9 billion in deposits in the area, which ranked first in size with a 21.1 percent share of the insured deposit market. Competition is strong as there are 19 insured institutions operating 200 offices in an area with a population of just over 600 thousand. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 250 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include First National Bank of Pennsylvania, PNC Bank, and First Place Bank.

Located between Cleveland Ohio and Pittsburgh Pennsylvania near the border of the two states, Youngstown is the primary city in the AA. Following the decline of the steel industry in the 1970's the local economy declined and resulted in large-scale abandonment of some neighborhoods. The AA's economic structure remains driven by a manufacturing base as well as other industries such as retail trade, education and health services, and local and state government. Major employers in the area include General Motors, Forum Health, HM Health Partners, Severstal Warren, and Youngstown State University.

The Youngstown AA was significantly impacted by the recession during the evaluation period, which affected the opportunity to lend in the area. Housing permits declined by 53 percent

between 2007 and 2010. Home prices and incomes also declined. Median housing prices in the AA at the beginning and end of the evaluation period were \$151 thousand and \$139 thousand, respectively. Unemployment levels were high and increased during the period. The multistate MSA's annual unadjusted unemployment rate rose from 6.1 percent in 2006 to 12.5 percent in 2009 before falling to 9.4 percent in 2011. In comparison, the annual unadjusted unemployment rate for Ohio increased from 5.4 percent in 2006 to 10.1 percent in 2009 before dropping to 8.6 percent in 2011. The annual unadjusted unemployment rate for Pennsylvania increased from 4.5 percent in 2006 to 8.5 percent in 2010 before dropping to 7.9 percent in 2011.

There are many opportunities to participate in and support community development initiatives in the AA, including working with local organizations on affordable housing, business development, and financial literacy programs. Community information, including information obtained from contacts with local organizations made by the OCC, reflect the need for small business lending, including micro loans, as well as loans for the acquisition, construction, rehabilitation of affordable housing. In addition, infrastructure improvements, neighborhood stabilization, and housing preservation are needed, along with permanent supporting housing for the homeless. Economic development, job creation programs, and business assistance programs are also identified needs of the area.

State of Florida

Naples-Marco Island, FL MSA (34940)

Demographic Information for Full-Scope Area: Naples Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	52	7.69	17.31	44.23	30.77	0.00
Population by Geography	251,377	7.48	18.77	45.24	28.51	0.00
Owner-Occupied Housing by Geography	77,829	2.30	13.08	47.98	36.65	0.00
Businesses by Geography	60,532	1.46	10.63	44.78	43.14	0.00
Farms by Geography	1,406	3.98	19.27	52.42	24.32	0.00
Family Distribution by Income Level	71,823	19.06	19.32	20.65	40.97	0.00
Distribution of Low- and Moderate- Income Families throughout AA Geographies	27,566	11.06	23.57	46.02	19.35	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below the Poverty Level	54,531 72,300 8%	Median Housing Value Unemployment Rate (2011 annual unadjusted Bureau of Labor Statistics)			191,305 10.3%	

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

Source: 2000 US Census and 2010 HUD updated MFI

The Naples AA consists of Collier County, Florida and is also the entire Naples-Marco Island MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

Huntington has two branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$71 million in deposits in the area, which ranked 27th fifth in size with a 0.7 percent share of the insured deposit market. Competition is strong as there are 41 insured institutions operating 150 offices in an area with a population of just over 250 thousand. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 400 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include Fifth Third Bank, Wells Fargo Bank, and Bank of America.

Collier County is the largest county in the State of Florida by land area, although nearly 80 percent is comprised of preserve lands and state parks. The population is centered in the cities of Naples, Marco Island, and Immokalee. Naples is the business center, Marco Island is a resort community, and Immokalee is where agricultural operations are located. The AA is seasonal in nature. Employment and business activity sharply increase as tourists and part-time residents come to the area. Top employers are Naples Community Hospital, Publix Supermarkets, Wal-Mart, Marriott International, and state and local government.

The economic recession during the evaluation period affected the AA and the state as a whole with considerable declines in real estate values, increases in residential foreclosures, and increased unemployment levels. Median housing prices in the AA at the beginning and end of the evaluation period were \$360 thousand and \$177 thousand, respectively. This affected the opportunity to lend in the area. Unemployment levels in the AA increased significantly during the evaluation period. The MSA's annual unadjusted unemployment rate rose from 3.0 percent in 2006 to 11.6 percent in 2010 before falling to 10.3 percent in 2011. In comparison, the annual unadjusted unemployment rate for Florida increased from 3.3 percent in 2006 to 11.3 percent in 2010 before dropping to 10.5 percent in 2011.

Opportunities exist for community development and working with local organizations, including serving on boards and committees. Community information, including information obtained from contacts with local organizations made by the OCC, reflects that there is a significant need for affordable housing as well as home loan modifications and programs to help homeowners avoid foreclosure. Financial literacy and credit repair programs are also needed. Small business loans, including micro loans, and working capital for nonprofit organizations are also identified needs of the AA.

State of Indiana

Indianapolis, IN MSA (26900)

Demographic Information for Full-Scope Area: Indianapolis Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	275	9.45	29.09	40.36	20.73	0.36
Population by Geography	1,308,603	5.40	24.26	42.80	27.55	0.00
Owner-Occupied Housing by Geography	339,095	3.36	19.43	44.91	32.31	0.00
Businesses by Geography	152,549	2.61	14.51	45.58	37.24	0.06
Farms by Geography	3,621	1.30	9.67	57.19	31.84	0.00
Family Distribution by Income Level	339,615	19.35	18.40	22.75	39.50	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	128,188	9.64	37.53	39.98	12.85	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below the Poverty Level	55,425 68,700 9%	Median Housing Value Unemployment Rate (2011 annual unadjusted - Bureau of Labor Statistics)			112,546 8.4%	

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

Source: 2000 US Census and 2010 HUD updated MFI

The Indianapolis AA consists of Boone, Hamilton, Hendricks, Johnson, and Marion counties in Indiana. This is the portion of the Indianapolis MSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

Huntington has 46 branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$2.1 billion in deposits in the area, which ranked fourth in size with a 7.1 percent share of the insured deposit market. Competition is strong as there are 40 insured institutions operating over 500 offices in an area with a population of 1.3 million. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, nearly 500 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include JPMorgan Chase, PNC Bank, and Fifth Third Bank.

Indianapolis is the primary city in the AA and serves as the state capital of Indiana. Major industries in the Indianapolis AA include manufacturing, health care, social services, and retail trade. The AA's major employers include Eli Lilly and Company, Indiana University, Purdue University, Clarian Health Partners, Community Health Network, St. Vincent Hospital, and FedEx.

The Indianapolis AA has experienced rising unemployment levels, falling home prices, and declining incomes during the economic recession, which also affected the opportunity to lend in the area. Median housing prices in the AA at the beginning and end of the evaluation period were \$147 thousand and \$140 thousand, respectively. Unemployment levels more than doubled during the evaluation period. The MSA's annual unadjusted unemployment rate rose from 4.4 percent in 2006 to 9.1 percent in 2010 before falling to 8.4 percent in 2011. In comparison, the annual unadjusted unemployment rate for Indiana increased from 5.0 percent in 2006 to 10.4 percent in 2009 before dropping to 9.0 percent in 2011.

There are many community organizations addressing affordable housing, economic development, and social service needs in the AA. Opportunities for participation in CD initiatives exist through a wide range of programs, including those for affordable housing, rural development, credit counseling, and small business loan programs. Community information, including information obtained from contacts with local organizations made by the OCC, reflects there are needs for affordable housing and the stabilization of distressed neighborhoods. The rehabilitation of housing stock, including rental units, along with constructing new homes and demolish blighted structures is needed. Infrastructure refurbishment is needed, as is economic development to expand businesses to create and retain jobs. Job training and job placement programs for low- and moderate-income residents and financial education programs are additional needs. Furthermore, Small business lines of credit, and banking services targeted to Spanish-speaking residents are additional identified needs in the AA.

U.S. Steel Corporation, PNC Financial Services Group, PPG Industries, H J Heinz Corporation, and University of Pittsburgh Medical Center.

While the economic recession did not affect the Pittsburgh AA as severely as many parts of the country, the area did experience increased unemployment levels and declines in incomes, which affected the opportunity to lend. Median housing prices in the AA at the beginning and end of the evaluation period were \$158 thousand and \$167 thousand, respectively. The MSA's annual unadjusted unemployment rate rose from 4.7 percent in 2006 to 7.8 percent in 2010 before falling to 7.2 percent in 2011. In comparison, the annual unadjusted unemployment rate for Pennsylvania increased from 4.5 percent in 2006 to 8.5 percent in 2010 before dropping to 7.9 percent in 2011.

There are opportunities to support and participate in CD initiatives. A variety of community groups address the affordable housing, economic development, and social service needs of low- and moderate-income individuals and families. There are opportunities provide financial support to local organizations, provide down payment and closing cost assistance to home buyers, provide financial education programs, and to support projects to purchase and rehabilitate vacant properties. Community information, including information obtained from contacts with local organizations made by the OCC, reflects that the primary needs in the AA include economic development initiatives, housing infill, and vacant property rehabilitation. Affordable housing needs include the development of new housing and rehabilitation of existing owner-occupied and rental units. Support services for the homeless such as food and shelter programs and permanent housing are needed. There is a need for financial education and housing counseling. Revitalization efforts are needed in economically distressed areas. Small business development and job creation and retention programs are also needed.

State of West Virginia

Charleston, WV MSA (16620)

Demographic Information for Full-Scope Area: Charleston Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	61	1.64	14.75	59.02	24.59	0.00
Population by Geography	251,662	0.57	8.69	63.45	27.30	0.00
Owner-Occupied Housing by Geography	77,433	0.12	7.43	64.46	27.98	0.00
Businesses by Geography	22,549	10.53	9.18	49.69	30.60	0.00
Farms by Geography	321	1.56	6.54	61.06	30.84	0.00
Family Distribution by Income Level	71,341	18.91	16.87	20.28	43.94	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	25,526	0.77	12.58	70.50	16.14	0.00
Median Family Income		Median Housing Value				
HUD Adjusted Median Family Income for 2010	40,961		Unemployment Rate (2011 annual unadjusted - Bureau of Labor Statistics)		83,974	
Households Below the Poverty Level	52,600				7.3%	
	14%					

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

Source: 2000 US Census and 2010 HUD updated MFI

The Charleston AA consists of Kanawha and Putnam counties in West Virginia. This is the portion of the Charleston MSA where the bank has offices. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

Huntington has eight branches within the AA. June 30, 2011 FDIC deposit data reflects that Huntington had \$593 million in deposits in the area, which ranked third in size with an 11.4 percent share of the insured deposit market. Competition is strong as there are 16 insured institutions operating 85 offices in an area with a population of 252 thousand. Financial institutions range from local community banks to large regional and national companies. Many competitors for loan products do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 150 lenders originated home mortgage loans in the AA during 2010. The largest deposit competitors include Branch Banking and Trust, United Bank and City National Bank of West Virginia.

The AA's primary city is Charleston, which is West Virginia's state capital. While state and local governments are the major employers, the economy is diversified. Rivers and highways make this area a major transportation and distribution hub. Other major employers include Charleston Area Medical Center, Bayer Material Science, and Frontier Communications.

During the evaluation period, the Charleston AA experienced a decrease in population with stalled employment growth, a decline in income levels, and increased unemployment levels as

a result of the economic recession. Median housing prices in the AA at the beginning and end of the evaluation period were \$152 thousand and \$157 thousand, respectively. This affected the opportunity to lend in the area. The MSA's annual unadjusted unemployment rate rose from 4.1 percent in 2006 to 7.6 percent in 2010 before falling to 7.3 percent in 2011. In comparison, the annual unadjusted unemployment rate for West Virginia increased from 4.5 percent in 2006 to 8.5 percent in 2010 before dropping to 8.0 percent in 2011.

There are opportunities to support and participate in CD initiatives, including working with community organizations. Opportunities exist to support initiatives by providing financial support and through technical assistance. Community information, including information obtained from contacts with local organizations made by the OCC reflect that there is a significant need for affordable housing, including the development of new housing as well as the rehabilitation assistance for owner-occupied and rental housing units. There are also needs for assistance to food and shelter programs for the homeless, as well as permanent housing for the homeless, the elderly, and others with special needs. Revitalization of blighted residential areas, infrastructure improvements, and development or re-development of commercial and industrial sites in the city and riverfront areas is also needed. Small business development, job creation, and job training program needs exist. Social service support for low- and moderate-income individuals is also needed, including the need for financial education programs such as credit counseling, homeownership, and basic financial literacy programs.

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

also presents market share information based on the most recent aggregate market data available.

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

Market share information is presented based on the most recent aggregate market data available.

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

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

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

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

Tables of Performance Data

Primary Rating Areas

- **State of Ohio**
- **State of Michigan**

Other Rating Areas

- **Multistate Metropolitan Areas**
 - Cincinnati-Middleton, OH-KY-IN
 - Weirton-Steubenville, WV-OH
 - Wheeling, WV-OH
 - Youngstown-Warren-Boardman, OH-PA
- **State of Florida**
- **State of Indiana**
- **State of Pennsylvania**
- **State of West Virginia**

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Columbus MSA	32.39	22,480	3,935,714	14,015	1,440,074	294	32,102	113	358,429	36,902	5,766,319	45.02
Cleveland-Elyria-Mentor MSA	16.79	8,799	1,233,626	10,260	1,072,720	26	3,217	44	95,979	19,129	2,405,542	17.70
Limited Review:												
Akron MSA	5.44	3,745	517,076	2,428	301,569	9	660	15	10,573	6,197	829,878	3.91
Canton-Massillon MSA	5.97	5,215	644,011	1,542	153,909	29	1,588	17	19,171	6,803	818,679	6.80
Dayton MSA	5.25	3,643	475,643	2,255	273,125	80	6,951	7	21,944	5,985	777,663	2.55
Lima MSA	1.27	777	79,642	631	72,574	35	4,645	5	5,172	1,448	162,033	1.34
Mansfield MSA	0.57	396	45,971	254	28,930	2	300	1	1,450	653	76,651	0.26
Sandusky MSA	0.31	237	36,320	111	9,367	1	60	0	0	349	45,747	0.00
Springfield MSA	1.55	868	87,027	778	88,361	116	13,240	4	974	1,766	189,602	1.20
Toledo MSA	11.90	8,395	1,045,479	4,871	542,224	260	18,712	33	30,153	13,559	1,636,568	10.25
Ohio Non-MSA	18.56	14,926	1,561,505	5,300	576,732	885	88,310	34	46,061	21,145	2,272,608	10.97
Other CD Loans:												
OH Statewide	0.00	0	0	0	0	0	0	26	47,661	26	47,661	0.00

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

** The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2011.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															
Geography: OHIO															
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Columbus MSA	8,156	37.71	2.94	3.09	17.51	10.51	45.74	36.07	33.81	50.33	5.45	13.05	7.53	3.78	6.30
Cleveland-Elyria-Mentor MSA	2,695	12.46	4.83	2.56	12.41	10.50	48.22	44.60	34.54	42.34	2.13	6.89	4.38	1.57	2.24
Limited Review:															
Akron MSA	1,172	5.42	2.76	1.45	18.38	16.04	51.56	49.66	27.30	32.85	2.82	3.19	7.03	1.97	2.76
Canton-Massillon MSA	1,425	6.59	0.92	0.00	14.69	8.14	65.16	66.11	19.23	25.75	7.24	0.00	10.68	6.89	7.21
Dayton MSA	1,214	5.61	2.03	0.33	18.03	17.30	48.40	48.35	31.54	34.02	2.50	3.57	7.83	1.86	1.92
Lima MSA	204	0.94	1.24	1.47	19.97	20.59	56.56	48.53	22.23	29.41	5.00	0.00	3.26	4.22	6.93
Mansfield MSA	148	0.68	0.16	0.00	14.17	7.43	58.08	66.89	27.58	25.68	2.35	0.00	4.76	1.88	2.77
Sandusky MSA	83	0.38	0.00	0.00	18.57	7.23	65.56	59.04	15.87	33.73	2.11	0.00	0.00	1.78	4.41
Springfield MSA	243	1.12	1.73	0.41	9.72	7.82	59.32	59.26	29.23	32.51	4.60	8.33	10.61	3.77	5.16
Toledo MSA	2,314	10.70	2.74	0.61	13.99	7.82	56.25	50.52	27.01	41.05	7.54	0.00	9.38	6.85	8.21
Ohio Non-MSA	3,975	18.38	0.06	0.00	9.98	6.84	74.82	71.62	15.14	21.53	6.68	0.00	7.48	6.30	7.92

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: OHIO					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Columbus MSA	493	16.68	2.94	2.64	17.51	12.17	45.74	40.77	33.81	44.42	9.53	10.00	3.21	8.69	13.30									
Cleveland-Elyria-Mentor MSA	824	27.88	4.83	4.98	12.41	10.68	48.22	48.54	34.54	35.80	5.89	0.00	3.04	5.63	8.21									
Limited Review:																								
Akron MSA	164	5.55	2.76	3.66	18.38	10.37	51.56	65.24	27.30	20.73	4.85	11.11	1.25	6.73	3.31									
Canton-Massillon MSA	195	6.60	0.92	1.54	14.69	15.90	65.16	69.74	19.23	12.82	7.67	0.00	2.99	8.57	9.59									
Dayton MSA	107	3.62	2.03	0.00	18.03	6.54	48.40	56.07	31.54	37.38	1.94	0.00	0.00	2.51	1.94									
Lima MSA	48	1.62	1.24	4.17	19.97	29.17	56.56	45.83	22.23	20.83	11.32	50.00	0.00	16.13	0.00									
Mansfield MSA	13	0.44	0.16	0.00	14.17	7.69	58.08	46.15	27.58	46.15	0.77	0.00	0.00	0.00	3.23									
Sandusky MSA	6	0.20	0.00	0.00	18.57	0.00	65.56	33.33	15.87	66.67	0.75	0.00	0.00	0.00	4.55									
Springfield MSA	47	1.59	1.73	0.00	9.72	17.02	59.32	51.06	29.23	31.91	1.64	0.00	5.88	1.96	0.00									
Toledo MSA	349	11.81	2.74	1.43	13.99	10.03	56.25	56.16	27.01	32.38	11.09	15.38	3.66	10.73	16.39									
Ohio Non-MSA	710	24.02	0.06	0.00	9.98	7.04	74.82	73.80	15.14	19.15	12.57	0.00	7.30	12.69	17.29									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: OHIO					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Columbus MSA	13,825	30.82	2.94	2.61	17.51	8.81	45.74	35.59	33.81	52.99	8.32	24.03	10.39	7.44	8.34									
Cleveland-Elyria-Mentor MSA	5,272	11.75	4.83	1.52	12.41	6.43	48.22	39.62	34.54	52.43	3.73	7.76	5.49	3.40	3.81									
Limited Review:																								
Akron MSA	2,406	5.36	2.76	0.79	18.38	8.19	51.56	52.66	27.30	38.36	4.68	1.35	7.46	4.86	4.20									
Canton-Massillon MSA	3,595	8.01	0.92	0.08	14.69	6.31	65.16	65.79	19.23	27.82	14.61	0.00	19.43	15.49	12.60									
Dayton MSA	2,320	5.17	2.03	0.34	18.03	11.55	48.40	51.34	31.54	36.77	3.57	2.50	6.22	4.12	2.79									
Lima MSA	525	1.17	1.24	1.52	19.97	15.43	56.56	52.00	22.23	31.05	6.84	0.00	14.17	6.75	5.69									
Mansfield MSA	235	0.52	0.16	0.00	14.17	5.96	58.08	51.06	27.58	42.98	3.96	0.00	10.87	3.17	4.51									
Sandusky MSA	147	0.33	0.00	0.00	18.57	4.76	65.56	57.14	15.87	38.10	3.65	0.00	0.00	3.25	5.63									
Springfield MSA	578	1.29	1.73	0.87	9.72	6.92	59.32	52.77	29.23	39.45	6.13	0.00	7.89	6.44	5.65									
Toledo MSA	5,718	12.75	2.74	0.30	13.99	4.79	56.25	52.20	27.01	42.71	15.31	20.83	19.95	16.73	13.62									
Ohio Non-MSA	10,235	22.82	0.06	0.00	9.98	4.32	74.82	69.88	15.14	25.80	16.12	0.00	13.27	15.79	17.70									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: OHIO					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Columbus MSA	6	15.00	12.21	16.67	31.62	33.33	35.18	16.67	20.99	33.33	0.65	0.00	0.00	0.00	2.00									
Cleveland-Elyria-Mentor MSA	8	20.00	12.81	12.50	25.25	50.00	44.29	25.00	17.66	12.50	1.11	0.00	11.11	0.00	0.00									
Limited Review:																								
Akron MSA	3	7.50	12.03	0.00	24.76	0.00	44.88	66.67	18.33	33.33	0.00	0.00	0.00	0.00	0.00									
Canton-Massillon MSA	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									
Dayton MSA	2	5.00	8.65	0.00	21.65	50.00	48.43	50.00	21.28	0.00	0.00	0.00	0.00	0.00	0.00									
Lima MSA	0	0.00	10.31	0.00	43.37	0.00	37.90	0.00	8.43	0.00	0.00	0.00	0.00	0.00	0.00									
Mansfield MSA	0	0.00	1.06	0.00	25.75	0.00	53.27	0.00	19.92	0.00	0.00	0.00	0.00	0.00	0.00									
Sandusky MSA	1	2.50	0.00	0.00	31.32	100.00	48.15	0.00	20.53	0.00	0.00	0.00	0.00	0.00	0.00									
Springfield MSA	0	0.00	4.16	0.00	21.72	0.00	70.62	0.00	3.49	0.00	0.00	0.00	0.00	0.00	0.00									
Toledo MSA	14	35.00	7.15	0.00	21.51	28.57	54.06	64.29	17.28	7.14	2.44	0.00	33.33	0.00	0.00									
Ohio Non-MSA	6	15.00	1.98	0.00	16.69	0.00	67.29	83.33	14.04	16.67	4.00	0.00	0.00	5.26	0.00									

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of Multi Family Units is the number of multifamily 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, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Columbus MSA	14,015	33.07	5.96	6.65	16.78	15.98	40.05	36.32	37.21	41.05	12.61	18.92	10.68	12.91	12.96									
Cleveland-Elyria-Mentor MSA	10,199	24.06	6.40	4.51	13.31	13.37	40.66	39.69	38.74	42.43	9.19	8.04	11.80	9.86	8.47									
Limited Review:																								
Akron MSA	2,428	5.73	7.24	5.64	12.95	8.48	44.58	46.50	35.22	39.37	7.75	6.17	8.13	8.33	7.67									
Canton-Massillon MSA	1,542	3.64	2.83	3.31	13.00	15.11	59.12	56.29	25.05	25.29	14.34	20.83	22.20	14.94	11.27									
Dayton MSA	2,255	5.32	5.20	5.45	17.28	16.72	43.08	40.98	34.43	36.85	6.69	6.19	6.77	6.64	7.10									
Lima MSA	631	1.49	7.23	8.87	18.45	28.68	52.23	42.79	22.09	19.65	11.61	15.66	18.66	10.51	9.20									
Mansfield MSA	254	0.60	2.54	5.51	15.93	24.41	53.51	35.83	28.02	34.25	4.34	3.45	5.11	2.77	7.09									
Sandusky MSA	111	0.26	0.00	0.00	20.53	20.72	62.78	58.56	16.69	20.72	4.91	0.00	2.24	6.24	3.82									
Springfield MSA	778	1.84	2.31	3.86	14.89	22.88	55.20	52.19	27.60	21.08	12.02	23.08	18.18	11.74	9.84									
Toledo MSA	4,871	11.49	3.58	2.53	10.54	10.31	52.72	48.31	33.16	38.86	16.24	17.28	16.93	15.92	17.17									
Ohio Non-MSA	5,300	12.50	0.60	0.17	10.32	7.92	74.66	75.25	14.42	16.66	12.05	1.64	11.47	12.89	12.08									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: OHIO		Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Columbus MSA	294	16.93	1.28	0.00	9.50	2.04	60.60	80.61	28.62	17.35	16.43	0.00	0.00	18.56	13.89						
Cleveland-Elyria-Mentor MSA	26	1.50	1.81	0.00	6.21	0.00	52.22	42.31	39.69	57.69	6.82	0.00	0.00	6.82	7.89						
Limited Review:																					
Akron MSA	9	0.52	2.38	0.00	8.96	33.33	60.00	44.44	28.66	22.22	2.78	0.00	0.00	4.35	0.00						
Canton-Massillon MSA	29	1.67	0.43	0.00	7.41	10.34	75.55	89.66	16.61	0.00	19.05	0.00	0.00	26.67	0.00						
Dayton MSA	80	4.61	0.60	0.00	9.67	3.75	65.66	96.25	24.06	0.00	5.63	0.00	10.00	5.97	0.00						
Lima MSA	35	2.01	0.17	0.00	2.51	0.00	77.22	94.29	20.10	5.71	5.84	0.00	0.00	6.25	4.17						
Mansfield MSA	2	0.12	0.60	0.00	3.02	0.00	69.56	100.00	26.81	0.00	0.00	0.00	0.00	0.00	0.00						
Sandusky MSA	1	0.06	0.00	0.00	6.61	0.00	79.88	100.00	13.51	0.00	0.00	0.00	0.00	0.00	0.00						
Springfield MSA	116	6.68	0.95	0.00	3.80	2.59	48.96	42.24	46.30	55.17	15.06	0.00	100.00	18.67	11.24						
Toledo MSA	260	14.97	0.55	0.00	4.52	0.00	71.64	93.46	23.29	6.54	10.61	0.00	0.00	11.53	4.17						
Ohio Non-MSA	885	50.95	0.00	0.00	3.35	2.60	78.46	79.89	18.19	17.51	14.60	0.00	37.50	14.95	12.92						

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: OHIO					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Columbus MSA	8,156	37.71	19.39	10.18	18.38	26.88	23.09	22.29	39.13	40.64	5.92	5.01	5.22	4.96	7.48									
Cleveland-Elyria-Mentor MSA	2,695	12.46	20.34	11.50	18.08	28.45	22.21	24.93	39.37	35.11	2.38	1.75	2.53	1.89	2.91									
Limited Review:																								
Akron MSA	1,172	5.42	19.24	13.43	18.62	28.16	23.21	23.98	38.93	34.44	3.09	3.47	3.15	2.53	3.27									
Canton-Massillon MSA	1,425	6.59	17.81	13.98	19.41	27.03	24.06	24.87	38.73	34.12	8.06	7.68	6.07	9.01	9.50									
Dayton MSA	1,214	5.61	19.26	12.33	18.66	26.59	22.62	25.34	39.46	35.74	2.82	3.06	2.65	2.63	2.97									
Lima MSA	204	0.94	19.16	15.90	18.83	24.10	22.82	21.54	39.19	38.46	5.16	4.38	3.19	5.47	7.14									
Mansfield MSA	148	0.68	17.95	13.61	19.32	19.05	23.37	33.33	39.36	34.01	2.52	3.79	1.52	4.37	1.20									
Sandusky MSA	83	0.38	19.00	2.41	18.59	16.87	23.34	27.71	39.07	53.01	2.33	0.00	2.26	3.87	2.14									
Springfield MSA	243	1.12	18.75	18.83	18.55	29.71	24.25	25.94	38.44	25.52	5.08	5.91	4.94	4.71	5.04									
Toledo MSA	2,314	10.70	20.18	11.88	18.07	28.58	22.67	23.67	39.08	35.87	8.05	7.08	8.48	7.60	8.38									
Ohio Non-MSA	3,975	18.38	17.07	9.63	19.16	28.46	24.32	27.51	39.45	34.40	7.46	6.19	6.57	7.64	8.75									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 3.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: OHIO					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Columbus MSA	493	16.68	19.39	12.03	18.38	16.67	23.09	24.05	39.13	47.26	9.55	8.59	7.51	11.74	9.95	
Cleveland-Elyria-Mentor MSA	824	27.88	20.34	12.00	18.08	23.50	22.21	27.78	39.37	36.72	5.91	2.93	5.36	8.28	5.97	
Limited Review:																
Akron MSA	164	5.55	19.24	9.82	18.62	26.99	23.21	22.09	38.93	41.10	5.01	1.67	8.62	2.80	5.15	
Canton-Massillon MSA	195	6.60	17.81	14.36	19.41	22.05	24.06	30.26	38.73	33.33	7.96	2.86	4.58	9.68	15.66	
Dayton MSA	107	3.62	19.26	6.54	18.66	14.02	22.62	22.43	39.46	57.01	2.01	0.00	1.45	1.97	3.09	
Lima MSA	48	1.62	19.16	16.67	18.83	10.42	22.82	25.00	39.19	47.92	12.50	16.67	8.33	12.50	13.64	
Mansfield MSA	13	0.44	17.95	15.38	19.32	30.77	23.37	23.08	39.36	30.77	0.81	0.00	0.00	3.57	0.00	
Sandusky MSA	6	0.20	19.00	0.00	18.59	16.67	23.34	16.67	39.07	66.67	0.76	0.00	2.00	0.00	0.00	
Springfield MSA	47	1.59	18.75	12.77	18.55	27.66	24.25	25.53	38.44	34.04	1.69	0.00	1.69	4.76	0.00	
Toledo MSA	349	11.81	20.18	9.86	18.07	25.51	22.67	24.64	39.08	40.00	11.06	7.06	8.28	10.38	17.60	
Ohio Non-MSA	710	24.02	17.07	9.63	19.16	23.09	24.32	28.47	39.45	38.81	13.17	9.29	16.38	13.85	11.99	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: OHIO					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Columbus MSA	13,825	30.82	19.39	6.58	18.38	16.79	23.09	23.91	39.13	52.71	9.30	10.36	9.54	9.20	9.16	
Cleveland-Elyria-Mentor MSA	5,272	11.75	20.34	7.63	18.08	17.97	22.21	24.60	39.37	49.79	4.16	5.02	4.34	3.73	4.21	
Limited Review:																
Akron MSA	2,406	5.36	19.24	7.07	18.62	17.09	23.21	25.95	38.93	49.89	5.24	5.44	4.48	5.20	5.50	
Canton-Massillon MSA	3,595	8.01	17.81	8.11	19.41	20.88	24.06	25.19	38.73	45.82	17.15	17.97	18.72	16.03	17.01	
Dayton MSA	2,320	5.17	19.26	7.10	18.66	19.21	22.62	25.65	39.46	48.03	4.05	5.60	4.70	3.63	3.87	
Lima MSA	525	1.17	19.16	9.78	18.83	20.35	22.82	28.18	39.19	41.68	7.37	10.08	7.04	9.39	5.66	
Mansfield MSA	235	0.52	17.95	6.09	19.32	22.17	23.37	27.39	39.36	44.35	4.39	5.50	4.61	4.59	3.95	
Sandusky MSA	147	0.33	19.00	3.50	18.59	11.89	23.34	22.38	39.07	62.24	4.10	3.70	0.75	2.91	6.42	
Springfield MSA	578	1.29	18.75	14.70	18.55	20.07	24.25	25.27	38.44	39.96	6.94	11.72	7.37	6.17	6.49	
Toledo MSA	5,718	12.75	20.18	7.35	18.07	19.21	22.67	27.16	39.08	46.28	16.82	16.50	18.14	17.64	15.98	
Ohio Non-MSA	10,235	22.82	17.07	6.88	19.16	20.15	24.32	27.80	39.45	45.17	17.75	17.08	20.05	18.15	16.69	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Columbus MSA	14,015	33.02	63.47	66.29	81.63	8.28	10.10	12.61	27.37
Cleveland-Elyria-Mentor MSA	10,260	24.17	64.75	64.44	81.40	8.56	10.04	9.19	18.78
Limited Review:									
Akron MSA	2,428	5.72	65.28	59.72	74.84	11.29	13.88	7.75	15.18
Canton-Massillon MSA	1,542	3.63	67.56	67.51	80.29	9.47	10.25	14.34	27.21
Dayton MSA	2,255	5.31	68.38	60.00	75.17	11.88	12.95	6.69	12.61
Lima MSA	631	1.49	65.08	68.94	78.13	9.67	12.20	11.61	23.60
Mansfield MSA	254	0.60	65.68	65.75	79.13	6.69	14.17	4.34	7.14
Sandusky MSA	111	0.26	64.01	57.66	85.59	8.11	6.31	4.91	5.69
Springfield MSA	778	1.83	69.58	64.91	78.53	9.13	12.34	12.02	17.98
Toledo MSA	4,871	11.48	64.70	58.94	76.10	11.44	12.46	16.24	24.31
Ohio Non-MSA	5,300	12.49	68.62	66.55	77.98	10.64	11.38	12.05	19.05

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.77% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OHIO			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Columbus MSA	294	16.93	97.34	88.10	62.93	26.53	10.54	16.43	17.67
Cleveland-Elyria-Mentor MSA	26	1.50	97.38	73.08	65.38	15.38	19.23	6.82	6.25
Limited Review:									
Akron MSA	9	0.52	97.68	44.44	77.78	11.11	11.11	2.78	0.00
Canton-Massillon MSA	29	1.67	98.65	79.31	86.21	13.79	0.00	19.05	18.52
Dayton MSA	80	4.61	98.01	82.50	68.75	28.75	2.50	5.63	5.38
Lima MSA	35	2.01	98.49	97.14	65.71	17.14	17.14	5.84	5.74
Mansfield MSA	2	0.12	98.99	100.00	0.00	100.00	0.00	0.00	0.00
Sandusky MSA	1	0.06	98.20	100.00	100.00	0.00	0.00	0.00	0.00
Springfield MSA	116	6.68	98.67	86.21	66.38	16.38	17.24	15.06	14.79
Toledo MSA	260	14.97	97.44	94.23	80.00	16.54	3.46	10.61	10.74
Ohio Non-MSA	885	50.95	98.95	94.35	66.33	26.89	6.78	14.60	15.99

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.50% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Columbus MSA	4	181	240	82,204	244	82,385	36.55	0	0
Cleveland-Elyria-Mentor MSA	3	535	128	30,864	131	31,399	13.93	0	0
Limited Review:									
Akron MSA	0	0	33	13,350	33	13,350	5.92	0	0
Canton-Massillon MSA	1	146	66	13,566	67	13,712	6.08	0	0
Dayton MSA	1	58	17	10,815	18	10,873	4.82	0	0
Lima MSA	0	0	9	5,069	9	5,069	2.25	0	0
Mansfield MSA	0	0	10	624	10	624	0.28	0	0
Sandusky MSA	0	0	1	245	1	245	0.11	0	0
Springfield MSA	1	232	11	1,813	12	2,045	0.91	0	0
Toledo MSA	1	698	33	21,013	34	21,711	9.63	0	0
Ohio Non-MSA	1	102	73	24,969	74	25,071	11.12	0	0
Other Investments:									
OH Statewide	1	176	13	18,749	14	18,925	8.40	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 BRANCHES AND BRANCH OPENINGS/CLOSINGS																	
Geography: OHIO																	
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Columbus MSA	45.02	77	22.71	9.09	22.08	29.87	38.96	19	6	-1	+6	+5	+3	6.60	22.56	42.13	28.47
Cleveland-Elyria-Mentor MSA	17.70	80	23.60	5.00	16.25	36.25	42.50	27	16	-1	0	+7	+5	9.74	16.77	43.79	29.67
Limited Review:																	
Akron MSA	3.91	19	5.61	5.26	15.79	31.58	47.37	2	2	0	0	+1	-1	6.29	21.45	48.11	24.15
Canton-Massillon MSA	6.80	25	7.37	4.00	12.00	60.00	24.00	2	3	0	-1	0	0	1.88	17.09	62.40	18.63
Dayton MSA	2.55	12	3.54	8.33	0.00	41.67	50.00	0	2	0	0	-1	-1	3.49	22.91	46.40	27.20
Lima MSA	1.34	5	1.48	0.00	40.00	60.00	0.00	1	2	0	0	0	-1	2.94	24.02	53.54	19.50
Mansfield MSA	0.26	1	.30	0.00	0.00	100.0	0.00	0	0	0	0	0	0	2.08	17.95	56.06	23.91
Sandusky MSA	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	24.16	61.49	14.35
Springfield MSA	1.20	4	1.18	0.00	50.00	50.00	0.00	0	0	0	0	0	0	3.37	15.18	57.07	24.38
Toledo MSA	10.25	43	12.68	2.33	9.30	62.79	25.58	1	9	0	-1	-5	-2	6.14	17.69	52.10	24.07
Ohio Non-MSA	10.97	73	21.53	0.00	9.59	78.08	12.33	3	7	0	0	-4	0	0.21	11.38	74.18	14.23

Table 1. Lending Volume

LENDING VOLUME		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Detroit-Livonia-Dearborn MD	5.51	849	115,307	1,474	137,613	1	100	19	33,773	2,343	286,793	3.82
Warren-Farmington Hills-Troy MD	26.70	5,333	789,399	5,984	642,111	6	280	22	86,530	11,345	1,518,320	51.07
Grand Rapids-Wyoming MSA	19.33	4,530	646,092	3,591	434,548	60	3,117	31	39,254	8,212	1,123,011	19.02
Limited Review:												
Cass County	0.92	224	22,975	165	10,553	1	50	0	0	390	33,578	.51
Holland-Grand Haven MSA	11.34	3,049	430,277	1,743	199,654	24	3,611	4	5,774	4,820	639,316	6.57
Kalamazoo-Portage MSA	2.03	568	86,954	280	38,642	0	0	14	31,643	862	157,239	.97
Monroe MSA	1.64	533	76,841	161	20,128	0	0	1	1,175	695	98,144	.49
Muskegon-Norton Shores MSA	5.52	1,502	145,975	829	53,991	9	1,288	7	14,945	2,347	216,199	2.16
Niles-Benton Harbor MSA	1.06	204	21,977	235	13,496	11	261	0	0	450	35,734	.50
Michigan Non-MSA	25.94	7,439	1,066,680	3,487	353,025	74	4,750	23	13,383	11,023	1,437,838	14.89
Other CD Loans:												
MI Statewide	0.00	0	0	0	0	0	0	19	33,278	19	33,278	0.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2011.
 *** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															
Geography: MICHIGAN															
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Detroit-Livonia-Dearborn MD	384	5.46	3.81	3.13	22.11	17.19	38.26	22.66	35.82	57.03	0.68	7.81	3.72	0.28	0.59
Warren-Farmington Hills-Troy MD	1,783	25.37	0.85	0.06	18.11	29.73	51.58	41.84	29.46	28.38	1.95	0.00	7.80	1.13	1.15
Grand Rapids-Wyoming MSA	1,331	18.94	1.00	0.60	15.20	18.78	58.53	49.06	25.28	31.56	2.98	7.14	6.95	1.93	3.42
Limited Review:															
Cass County	63	0.90	0.00	0.00	14.63	33.33	85.37	66.67	0.00	0.00	5.35	0.00	19.23	3.53	0.00
Holland-Grand Haven MSA	832	11.84	0.00	0.00	4.67	7.33	91.47	87.98	3.87	4.69	3.89	0.00	5.75	3.83	2.92
Kalamazoo-Portage MSA	250	3.56	2.27	0.00	11.27	14.80	50.65	40.00	35.81	45.20	2.74	0.00	7.47	2.18	2.48
Monroe MSA	147	2.09	0.58	0.00	1.35	4.08	94.57	85.71	3.51	10.20	2.96	0.00	10.53	2.51	10.00
Muskegon-Norton Shores MSA	448	6.38	3.33	0.45	15.03	15.18	54.98	57.59	26.66	26.79	4.23	0.00	6.88	3.61	4.68
Niles-Benton Harbor MSA	77	1.10	2.31	1.30	6.82	12.99	67.25	75.32	23.62	10.39	1.15	0.00	5.63	1.20	0.41
Michigan Non-MSA	1,712	24.36	0.00	0.00	5.05	3.80	70.88	71.44	24.07	24.77	5.09	0.00	4.59	5.73	3.71

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: MICHIGAN															
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Detroit-Livonia-Dearborn MD	35	3.56	3.81	20.00	22.11	31.43	38.26	25.71	35.82	22.86	0.25	0.00	0.00	0.00	0.61
Warren-Farmington Hills-Troy MD	154	15.67	0.85	0.65	18.11	17.53	51.58	52.60	29.46	29.22	1.24	0.00	0.91	0.68	2.48
Grand Rapids-Wyoming MSA	139	14.14	1.00	0.00	15.20	15.11	58.53	55.40	25.28	29.50	1.93	0.00	5.81	1.65	0.58
Limited Review:															
Cass County	22	2.24	0.00	0.00	14.63	22.73	85.37	77.27	0.00	0.00	2.94	0.00	10.00	1.72	0.00
Holland-Grand Haven MSA	69	7.02	0.00	0.00	4.67	0.00	91.47	92.75	3.87	7.25	3.88	0.00	0.00	4.29	0.00
Kalamazoo-Portage MSA	9	0.92	2.27	0.00	11.27	11.11	50.65	22.22	35.81	66.67	0.00	0.00	0.00	0.00	0.00
Monroe MSA	18	1.83	0.58	0.00	1.35	0.00	94.57	88.89	3.51	11.11	0.99	0.00	0.00	0.00	25.00
Muskegon-Norton Shores MSA	88	8.95	3.33	7.95	15.03	14.77	54.98	46.59	26.66	30.68	1.49	0.00	3.57	1.96	0.00
Niles-Benton Harbor MSA	10	1.02	2.31	0.00	6.82	20.00	67.25	70.00	23.62	10.00	0.44	0.00	0.00	0.35	0.71
Michigan Non-MSA	439	44.66	0.00	0.00	5.05	2.96	70.88	79.95	24.07	17.08	7.10	0.00	11.90	6.25	8.62

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Detroit-Livonia-Dearborn MD	430	2.65	3.81	3.26	22.11	12.33	38.26	24.19	35.82	60.23	0.56	4.44	1.79	0.36	0.56									
Warren-Farmington Hills-Troy MD	3,395	20.94	0.85	0.12	18.11	13.17	51.58	48.63	29.46	38.09	1.80	3.03	6.50	1.80	1.37									
Grand Rapids-Wyoming MSA	3,057	18.86	1.00	0.23	15.20	10.30	58.53	50.21	25.28	39.25	4.03	0.00	5.35	4.01	3.90									
Limited Review:																								
Cass County	139	0.86	0.00	0.00	14.63	11.51	85.37	88.49	0.00	0.00	3.32	0.00	12.73	2.83	0.00									
Holland-Grand Haven MSA	2,146	13.24	0.00	0.00	4.67	3.36	91.47	91.15	3.87	5.50	5.75	0.00	6.32	5.63	7.95									
Kalamazoo-Portage MSA	309	1.91	2.27	0.32	11.27	9.06	50.65	38.19	35.81	52.43	1.71	0.00	5.73	1.30	1.70									
Monroe MSA	368	2.27	0.58	0.00	1.35	0.54	94.57	89.67	3.51	9.78	4.41	0.00	10.53	4.24	6.43									
Muskegon-Norton Shores MSA	966	5.96	3.33	1.97	15.03	9.83	54.98	56.00	26.66	32.19	7.28	30.77	17.42	7.25	5.97									
Niles-Benton Harbor MSA	117	0.72	2.31	0.00	6.82	9.40	67.25	71.79	23.62	18.80	0.80	0.00	6.78	0.78	0.55									
Michigan Non-MSA	5,284	32.60	0.00	0.00	5.05	2.93	70.88	70.10	24.07	26.97	9.26	0.00	11.97	10.15	7.36									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Detroit-Livonia-Dearborn MD	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	0.00	0.00							
Warren-Farmington Hills-Troy MD	1	10.00	5.29	0.00	25.86	100.00	56.36	0.00	12.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Grand Rapids-Wyoming MSA	3	30.00	0.80	0.00	19.69	33.33	68.28	66.67	11.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Limited Review:																								
Cass County	0	0.00	0.00	0.00	77.44	0.00	22.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Holland-Grand Haven MSA	2	20.00	0.00	0.00	4.25	0.00	94.68	100.00	1.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Kalamazoo-Portage MSA	0	0.00	10.12	0.00	23.21	0.00	54.93	0.00	11.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Monroe MSA	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	0.00	0.00							
Muskegon-Norton Shores MSA	0	0.00	11.91	0.00	42.97	0.00	27.84	0.00	17.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Niles-Benton Harbor MSA	0	0.00	14.41	0.00	15.61	0.00	52.34	0.00	17.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Michigan Non-MSA	4	40.00	0.00	0.00	7.58	0.00	73.99	100.00	18.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of Multi Family Units is the number of multifamily 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, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Detroit-Livonia-Dearborn MD	1,444	8.06	5.34	6.37	21.67	33.17	35.29	34.14	37.30	26.32	1.86	3.66	3.68	1.86	1.09									
Warren-Farmington Hills-Troy MD	5,979	33.38	1.89	3.60	16.14	24.92	49.22	45.43	32.61	26.06	3.56	6.69	6.02	3.54	2.49									
Grand Rapids-Wyoming MSA	3,591	20.05	1.90	2.51	15.98	12.42	52.53	57.42	29.59	27.65	8.45	8.78	6.41	10.22	7.18									
Limited Review:																								
Cass County	165	0.92	0.00	0.00	20.14	34.55	79.86	65.45	0.00	0.00	8.47	0.00	17.33	6.62	0.00									
Holland-Grand Haven MSA	1,743	9.73	0.00	0.00	7.17	4.88	89.93	93.63	2.90	1.49	10.77	0.00	7.11	11.21	9.33									
Kalamazoo-Portage MSA	280	1.56	2.63	12.14	17.78	21.07	47.39	47.14	32.21	19.64	2.69	14.81	2.52	2.54	2.01									
Monroe MSA	161	0.90	0.64	0.00	2.24	1.24	94.35	95.65	2.77	3.11	3.23	0.00	3.23	3.14	10.34									
Muskegon-Norton Shores MSA	829	4.63	4.14	6.15	16.91	22.44	45.58	41.98	33.37	29.43	10.74	16.07	15.49	9.50	9.26									
Niles-Benton Harbor MSA	235	1.31	5.21	0.00	8.86	23.40	63.07	65.11	22.85	11.49	2.94	0.00	7.63	3.60	0.89									
Michigan Non-MSA	3,483	19.45	0.00	0.00	5.40	4.36	70.37	74.45	24.19	21.19	10.13	0.00	10.03	11.43	8.16									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: MICHIGAN		Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011												
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																		
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp														
Full Review:																													
Detroit-Livonia-Dearborn MD	1	0.54	3.36	0.00	16.79	0.00	41.45	100.00	38.31	0.00	0.00	0.00	0.00	0.00	0.00														
Warren-Farmington Hills-Troy MD	6	3.23	1.91	0.00	16.16	66.67	56.27	33.33	25.67	0.00	1.56	0.00	8.33	0.00	0.00														
Grand Rapids-Wyoming MSA	60	32.26	0.29	0.00	7.29	3.33	67.70	85.00	24.72	11.67	10.34	0.00	0.00	10.43	14.29														
Limited Review:																													
Cass County	1	0.54	0.00	0.00	5.19	0.00	94.81	100.00	0.00	0.00	3.70	0.00	0.00	4.00	0.00														
Holland-Grand Haven MSA	24	12.90	0.00	0.00	1.67	0.00	97.38	100.00	0.94	0.00	6.38	0.00	0.00	6.52	0.00														
Kalamazoo-Portage MSA	0	0.00	0.89	0.00	8.86	0.00	48.74	0.00	41.51	0.00	0.00	0.00	0.00	0.00	0.00														
Monroe MSA	0	0.00	0.14	0.00	0.42	0.00	97.21	0.00	2.23	0.00	0.00	0.00	0.00	0.00	0.00														
Muskegon-Norton Shores MSA	9	4.84	1.48	0.00	8.13	0.00	68.72	55.56	21.67	44.44	0.00	0.00	0.00	0.00	0.00														
Niles-Benton Harbor MSA	11	5.91	1.44	0.00	1.83	0.00	78.98	100.00	17.75	0.00	8.33	0.00	0.00	11.11	0.00														
Michigan Non-MSA	74	39.78	0.00	0.00	3.11	4.05	69.48	85.14	27.41	10.81	5.83	0.00	14.29	6.54	3.49														

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE																
Geography: MICHIGAN																
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011																
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
Full Review:																
Detroit-Livonia-Dearborn MD	384	5.46	23.09	11.84	16.60	27.89	19.31	22.89	41.01	37.37	0.75	0.52	0.46	0.98	0.90	
Warren-Farmington Hills-Troy MD	1,783	25.37	18.03	25.48	18.20	28.90	23.57	18.11	40.21	27.51	2.06	2.93	2.01	1.42	1.82	
Grand Rapids-Wyoming MSA	1,331	18.94	18.29	15.73	18.78	28.45	24.39	19.20	38.55	36.62	3.18	2.16	2.97	3.21	4.39	
Limited Review:																
Cass County	63	0.90	19.26	34.92	20.37	33.33	24.84	19.05	35.53	12.70	5.99	10.39	9.09	5.88	1.37	
Holland-Grand Haven MSA	832	11.84	14.28	18.02	19.85	32.82	29.77	22.91	36.09	26.25	3.93	4.47	3.54	3.66	4.11	
Kalamazoo-Portage MSA	250	3.56	17.89	8.94	17.69	32.11	23.20	18.70	41.21	40.24	2.92	1.73	2.81	2.54	3.76	
Monroe MSA	147	2.09	17.78	13.89	19.03	28.47	25.15	31.94	38.05	25.69	3.11	2.42	3.58	2.96	3.23	
Muskegon-Norton Shores MSA	448	6.38	19.62	19.59	18.74	31.66	22.87	24.37	38.77	24.37	4.46	4.69	4.54	4.12	4.48	
Niles-Benton Harbor MSA	77	1.10	20.21	20.78	17.87	20.78	21.98	31.17	39.93	27.27	1.28	3.16	0.91	1.13	1.07	
Michigan Non-MSA	1,712	24.36	15.37	8.32	18.02	19.85	24.17	21.51	42.45	50.33	5.49	4.55	4.55	5.39	6.32	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011						Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Detroit-Livonia-Dearborn MD	35	3.56	23.09	20.00	16.60	11.43	19.31	34.29	41.01	34.29	0.26	0.00	0.00	0.00	0.91	
Warren-Farmington Hills-Troy MD	154	15.67	18.03	14.29	18.20	23.38	23.57	24.68	40.21	37.66	1.29	0.86	1.23	0.72	2.39	
Grand Rapids-Wyoming MSA	139	14.14	18.29	15.22	18.78	22.46	24.39	23.91	38.55	38.41	2.02	6.67	1.28	1.38	0.53	
Limited Review:																
Cass County	22	2.24	19.26	18.18	20.37	18.18	24.84	36.36	35.53	27.27	3.03	7.14	0.00	0.00	6.67	
Holland-Grand Haven MSA	69	7.02	14.28	7.35	19.85	19.12	29.77	36.76	36.09	36.76	4.11	0.00	4.08	7.35	2.50	
Kalamazoo-Portage MSA	9	0.92	17.89	11.11	17.69	22.22	23.20	33.33	41.21	33.33	0.00	0.00	0.00	0.00	0.00	
Monroe MSA	18	1.83	17.78	5.56	19.03	11.11	25.15	66.67	38.05	16.67	1.01	0.00	0.00	4.35	0.00	
Muskegon-Norton Shores MSA	88	8.95	19.62	21.84	18.74	19.54	22.87	31.03	38.77	27.59	1.50	0.00	0.00	4.65	1.96	
Niles-Benton Harbor MSA	10	1.02	20.21	0.00	17.87	30.00	21.98	50.00	39.93	20.00	0.46	0.00	1.16	0.00	0.55	
Michigan Non-MSA	439	44.66	15.37	8.74	18.02	23.22	24.17	25.29	42.45	42.76	7.38	5.26	10.00	5.92	7.44	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Detroit-Livonia-Dearborn MD	430	2.65	23.09	7.11	16.60	12.25	19.31	20.83	41.01	59.80	0.67	0.71	0.30	0.83	0.68	
Warren-Farmington Hills-Troy MD	3,395	20.94	18.03	15.77	18.20	21.87	23.57	25.84	40.21	36.53	2.06	3.72	2.47	1.95	1.65	
Grand Rapids-Wyoming MSA	3,057	18.86	18.29	7.87	18.78	20.59	24.39	25.76	38.55	45.78	4.44	4.34	4.31	4.71	4.37	
Limited Review:																
Cass County	139	0.86	19.26	17.78	20.37	25.93	24.84	25.93	35.53	30.37	3.74	5.33	6.71	3.73	2.67	
Holland-Grand Haven MSA	2,146	13.24	14.28	12.87	19.85	23.49	29.77	31.25	36.09	32.38	6.32	8.44	6.74	6.13	5.64	
Kalamazoo-Portage MSA	309	1.91	17.89	5.74	17.69	18.58	23.20	22.64	41.21	53.04	1.83	1.09	1.52	1.71	2.04	
Monroe MSA	368	2.27	17.78	7.22	19.03	19.17	25.15	30.56	38.05	43.06	4.99	2.44	3.89	5.09	6.16	
Muskegon-Norton Shores MSA	966	5.96	19.62	10.86	18.74	24.41	22.87	26.88	38.77	37.85	7.72	8.13	9.01	8.65	6.52	
Niles-Benton Harbor MSA	117	0.72	20.21	10.91	17.87	21.82	21.98	30.91	39.93	36.36	0.83	2.26	0.67	0.90	0.72	
Michigan Non-MSA	5,284	32.60	15.37	6.29	18.02	18.88	24.17	24.29	42.45	50.54	10.32	12.67	13.71	11.85	8.65	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
geography: MICHIGAN					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Detroit-Livonia-Dearborn MD	1,474	8.21	67.41	65.94	83.11	7.06	9.84	1.86	3.97
Warren-Farmington Hills-Troy MD	5,984	33.34	69.25	61.46	81.05	8.44	10.51	3.56	8.20
Grand Rapids-Wyoming MSA	3,591	20.01	67.74	64.02	76.86	9.80	13.34	8.45	14.76
Limited Review:									
Cass County	165	0.92	72.50	81.82	89.09	6.67	4.24	8.47	16.36
Holland-Grand Haven MSA	1,743	9.71	71.09	73.09	77.68	9.64	12.68	10.77	18.53
Kalamazoo-Portage MSA	280	1.56	65.58	63.21	76.07	8.93	15.00	2.69	4.80
Monroe MSA	161	0.90	69.20	71.43	73.29	11.80	14.91	3.23	4.84
Muskegon-Norton Shores MSA	829	4.62	70.97	77.56	87.94	7.72	4.34	10.74	19.26
Niles-Benton Harbor MSA	235	1.31	69.61	75.74	90.64	7.23	2.13	2.94	5.77
Michigan Non-MSA	3,487	19.43	72.32	76.00	80.67	7.94	11.39	10.13	17.51

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.56% 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, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Detroit-Livonia-Dearborn MD	1	0.54	97.30	100.00	100.00	0.00	0.00	0.00	0.00
Warren-Farmington Hills-Troy MD	6	3.23	96.84	100.00	100.00	0.00	0.00	1.56	3.33
Grand Rapids-Wyoming MSA	60	32.26	96.50	70.00	88.33	8.33	3.33	10.34	11.70
Limited Review:									
Cass County	1	0.54	97.81	100.00	100.00	0.00	0.00	3.70	4.76
Holland-Grand Haven MSA	24	12.90	94.77	75.00	58.33	20.83	20.83	6.38	5.66
Kalamazoo-Portage MSA	0	0.00	93.65	0.00	0.00	0.00	0.00	0.00	0.00
Monroe MSA	0	0.00	97.07	0.00	0.00	0.00	0.00	0.00	0.00
Muskegon-Norton Shores MSA	9	4.84	97.29	44.44	55.56	33.33	11.11	0.00	0.00
Niles-Benton Harbor MSA	11	5.91	96.87	63.64	100.00	0.00	0.00	8.33	10.71
Michigan Non-MSA	74	39.78	97.65	91.89	87.84	6.76	5.41	5.83	7.41

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 4.84% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MICHIGAN									
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Detroit-Livonia-Dearborn MD	3	704	54	6,137	57	6,841	10.39	3	4,673
Warren-Farmington Hills-Troy MD	2	1,771	40	20,191	42	21,962	33.35	0	0
Grand Rapids-Wyoming MSA	4	1,124	53	12,440	57	13,564	20.60	0	0
Limited Review:									
Cass County	1	22	3	197	4	219	0.33	0	0
Holland-Grand Haven MSA	2	144	13	3,173	15	3,317	5.04	0	0
Kalamazoo-Portage MSA	1	74	7	3,346	8	3,420	5.19	0	0
Monroe MSA	0	0	1	131	1	131	0.20	0	0
Muskegon-Norton Shores MSA	2	76	10	639	12	715	1.09	0	0
Niles-Benton Harbor MSA	1	22	2	666	3	688	1.04	0	0
Michigan Non-MSA	6	461	33	7,222	39	7,683	11.67	0	0
Other Investments:									
MI Statewide	2	137	10	7,175	12	7,312	11.10	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 BRANCHES AND BRANCH OPENINGS/CLOSINGS																	
Geography: MICHIGAN																	
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Detroit-Livonia-Dearborn MD	3.82	10	7.52	0.00	40.00	20.00	40.00	7	1	0	+2	+1	+3	7.80	30.49	33.77	27.85
Warren-Farmington Hills-Troy MD	51.07	45	33.84	0.00	24.44	48.89	26.67	8	8	0	+1	-1	0	1.86	19.57	50.75	27.80
Grand Rapids-Wyoming MSA	19.02	23	17.29	0.00	17.39	56.52	26.09	3	2	0	+1	0	0	2.17	19.73	56.05	22.04
Limited Review:																	
Cass County	.51	1	.75	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	18.66	81.34	0.00
Holland-Grand Haven MSA	6.57	11	8.27	0.00	0.00	100.0	0.00	3	2	0	0	+1	0	0.00	5.86	90.83	3.31
Kalamazoo-Portage MSA	.97	2	1.50	0.00	50.00	50.00	0.00	1	1	0	0	0	0	7.82	16.76	46.63	28.79
Monroe MSA	.49	1	.75	0.00	0.00	100.0	0.00	0	0	0	0	0	0	1.03	2.15	93.50	3.33
Muskegon-Norton Shores MSA	2.16	4	3.01	25.00	0.00	25.00	50.00	0	1	0	-1	0	0	5.82	21.98	48.81	23.40
Niles-Benton Harbor MSA	.50	1	.75	0.00	100.0	0.00	0.00	0	0	0	0	0	0	5.96	9.99	63.16	20.88
Michigan Non-MSA	14.89	35	26.32	0.00	11.43	74.29	14.28	0	0	0	0	0	0	0.00	5.39	71.28	22.92

Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE MSAs				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Cincinnati-Middleton OH-KY-IN	100.00	10,772	1,690,023	6,448	841,435	8	304	32	46,161	17,260	2,577,923	100.00
Weirton-Steubenville WV-OH^	100.00	1,749	144,287	307	31,929	4	70	5	4,680	2,065	180,966	100.00
Wheeling WV-OH^	100.00	827	76,215	195	14,050	1	75	6	10,808	1,029	101,148	100.00
Youngstown-Warren-Boardman OH-PA^	100.00	5,111	521,370	2,113	210,547	10	532	21	47,147	7,255	779,596	100.00

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

** The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2011.

*** Deposit Data as of April 16, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Cincinnati-Middleton OH-KY-IN	3,337	100.00	2.38	2.01	14.70	17.77	51.43	47.11	31.49	33.11	2.38	4.40	6.06	1.73	2.09									
Weirton-Steubenville WV-OH^	428	100.00	0.63	0.00	5.80	4.67	86.75	86.68	6.82	8.64	14.47	0.00	12.00	14.42	16.33									
Wheeling WV-OH^	259	100.00	1.02	0.39	10.09	6.95	67.85	70.27	21.03	22.39	4.95	0.00	5.66	5.02	4.65									
Youngstown-Warren-Boardman OH-PA^	1,314	100.00	2.55	0.53	11.77	7.76	64.91	62.10	20.77	29.60	5.42	18.75	8.08	5.20	5.31									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Cincinnati-Middleton OH-KY-IN	389	100.00	2.38	1.29	14.70	12.85	51.43	51.67	31.49	34.19	3.93	0.00	3.72	3.26	5.23									
Weirton-Steubenville WV-OH^	200	100.00	0.63	0.00	5.80	7.50	86.75	87.50	6.82	5.00	15.52	0.00	16.67	15.76	11.76									
Wheeling WV-OH^	78	100.00	1.02	0.00	10.09	8.97	67.85	65.38	21.03	25.64	4.93	0.00	3.03	4.25	7.45									
Youngstown-Warren-Boardman OH-PA^	268	100.00	2.55	0.75	11.77	7.09	64.91	67.16	20.77	25.00	5.53	0.00	1.28	5.43	7.98									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Cincinnati-Middleton OH-KY-IN	7,042	100.00	2.38	1.35	14.70	9.68	51.43	44.99	31.49	43.98	3.29	6.90	6.28	3.05	3.06									
Weirton-Steubenville WV-OH^	1,121	100.00	0.63	0.00	5.80	3.93	86.75	89.83	6.82	6.24	30.12	0.00	42.31	31.07	18.09									
Wheeling WV-OH^	490	100.00	1.02	0.00	10.09	6.12	67.85	73.47	21.03	20.41	12.18	0.00	17.54	14.27	7.44									
Youngstown-Warren-Boardman OH-PA^	3,524	100.00	2.55	0.48	11.77	4.57	64.91	60.84	20.77	34.11	12.40	18.75	13.81	12.71	11.72									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MULTISTATE MSAs				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****						
Full Review:																
Cincinnati-Middleton OH-KY-IN	4	100.00	17.48	50.00	22.32	50.00	43.96	0.00	16.23	0.00	0.84	0.00	3.45	0.00	0.00	
Weirton-Steubenville WV-OH^	0	100.00	1.01	0.00	38.03	0.00	51.91	0.00	9.06	0.00	0.00	0.00	0.00	0.00	0.00	
Wheeling WV-OH^	0	100.00	9.00	0.00	29.32	0.00	33.14	0.00	28.55	0.00	0.00	0.00	0.00	0.00	0.00	
Youngstown-Warren-Boardman OH-PA^	5	100.00	9.03	0.00	16.22	0.00	58.72	20.00	16.03	80.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of Multi Family Units is the number of multifamily 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.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Cincinnati-Middleton OH-KY-IN	6,411	100.00	4.61	4.13	14.99	17.63	47.59	45.86	32.15	32.38	5.61	5.73	6.93	5.71	5.13									
Weirton-Steubenville WV-OH^	307	100.00	0.94	0.65	10.72	11.40	78.44	82.08	9.91	5.86	17.51	22.22	15.09	19.15	15.38									
Wheeling WV-OH^	195	100.00	3.32	0.51	19.36	23.59	55.79	56.92	21.52	18.97	6.58	0.00	8.26	7.30	5.93									
Youngstown-Warren-Boardman OH-PA^	2,083	100.00	3.98	4.66	11.45	11.81	57.22	53.67	27.20	29.86	12.92	14.40	15.93	11.62	14.57									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Cincinnati-Middleton OH-KY-IN	8	100.00	1.19	0.00	10.87	0.00	59.45	50.00	28.40	50.00	1.26	0.00	0.00	0.94	2.27									
Weirton-Steubenville WV-OH^	4	100.00	0.61	0.00	2.45	25.00	93.87	75.00	3.07	0.00	30.00	0.00	100.00	22.22	0.00									
Wheeling WV-OH^	1	100.00	1.10	0.00	3.30	0.00	82.42	100.00	13.19	0.00	0.00	0.00	0.00	0.00	0.00									
Youngstown-Warren-Boardman OH-PA^	10	100.00	0.82	0.00	4.19	0.00	74.33	100.00	20.66	0.00	8.11	0.00	0.00	9.09	0.00									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cincinnati-Middleton OH-KY-IN	3,337	100.00	18.81	14.66	18.19	29.19	22.97	22.76	40.03	33.40	2.65	2.74	2.84	2.00	2.90	
Weirton-Steubenville WV-OH^	428	100.00	19.20	8.47	19.14	20.94	23.11	33.18	38.55	37.41	15.61	11.67	8.55	21.31	17.14	
Wheeling WV-OH^	259	100.00	19.76	5.51	18.68	16.54	22.15	27.56	39.41	50.39	5.70	2.22	5.98	4.17	7.39	
Youngstown-Warren-Boardman OH-PA^	1,314	100.00	18.74	13.63	18.92	26.86	22.62	27.09	39.71	32.42	5.71	4.10	5.76	6.18	5.90	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by bank.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTISTATE MSAs				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati-Middleton OH-KY-IN	389	100.00	18.81	14.77	18.19	20.47	22.97	24.35	40.03	40.41	3.96	3.02	3.14	4.33	4.58
Weirton-Steubenville WV-OH^	200	100.00	19.20	6.57	19.14	25.25	23.11	26.77	38.55	41.41	15.52	8.33	23.53	8.93	16.83
Wheeling WV-OH^	78	100.00	19.76	9.09	18.68	19.48	22.15	24.68	39.41	46.75	5.30	2.70	4.76	4.35	6.87
Youngstown-Warren-Boardman OH-PA^	268	100.00	18.74	14.66	18.92	21.80	22.62	33.08	39.71	30.45	5.83	6.03	5.13	7.94	4.49

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATE MSAs				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati-Middleton OH-KY-IN	7,042	100.00	18.81	7.92	18.19	18.87	22.97	25.42	40.03	47.78	3.62	5.16	4.24	3.50	3.32
Weirton-Steubenville WV-OH^	1,121	100.00	19.20	7.12	19.14	20.09	23.11	26.21	38.55	46.58	31.79	39.68	41.40	24.05	31.19
Wheeling WV-OH^	490	100.00	19.76	7.28	18.68	15.38	22.15	24.12	39.41	53.22	14.48	16.67	17.27	14.45	13.73
Youngstown-Warren-Boardman OH-PA^	3,524	100.00	18.74	6.80	18.92	20.06	22.62	27.04	39.71	46.09	13.45	13.56	16.10	12.64	12.92

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 4.3% of loans originated and purchased by bank.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATE MSAs			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cincinnati-Middleton OH-KY-IN	6,448	100.00	65.59	61.24	75.11	10.24	14.66	5.61	9.43
Weirton-Steubenville WV-OH^	307	100.00	63.24	61.56	80.78	11.40	7.82	17.51	24.46
Wheeling WV-OH^	195	100.00	63.20	65.64	88.21	5.13	6.67	6.58	13.13
Youngstown-Warren-Boardman OH-PA^	2,113	100.00	66.68	63.37	78.47	10.65	10.88	12.92	20.82

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5.29% of small loans to businesses originated and purchased by the bank.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: MULTISTATE MSAs					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Cincinnati-Middleton OH-KY-IN	8	100.00	97.61	100.00	100.00	0.00	0.00	1.26	1.71
Weirton-Steubenville WV-OH^	4	100.00	98.16	75.00	100.00	0.00	0.00	30.00	28.57
Wheeling WV-OH^	1	100.00	99.45	0.00	100.00	0.00	0.00	0.00	0.00
Youngstown-Warren-Boardman OH-PA^	10	100.00	98.80	80.00	100.00	0.00	0.00	8.11	11.11

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 13.04% of small loans to farms originated and purchased by the bank.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: MULTISTATE MSAs		Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cincinnati-Middleton OH-KY-IN	2	378	42	27,306	44	27,684	100.00	1	250
Weirton-Steubenville WV-OH^	0	0	19	998	19	998	100.00	0	0
Wheeling WV-OH^	0	0	11	2,890	11	2,890	100.00	0	0
Youngstown-Warren-Boardman OH-PA^	0	0	27	14,969	27	14,969	100.00	0	0

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

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

DISTRIBUTION OF BRANCHES AND BRANCH OPENINGS/CLOSINGS																	
Geography: MULTISTATE MSAs																	
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cincinnati-Middleton OH-KY-IN	100.00	42	100.00	0.00	19.05	52.38	28.57	12	5	0	+1	+2	+4	6.80	18.14	47.69	27.27
Weirton-Steubenville WV-OH^	100.00	11	100.00	0.00	9.09	90.91	0.00	0	0	0	0	0	0	1.24	8.86	83.37	6.54
Wheeling WV-OH^	100.00	7	100.00	0.00	14.28	42.86	42.86	0	0	0	0	0	0	1.67	12.75	65.01	20.58
Youngstown-Warren-Boardman OH-PA^	100.00	41	100.00	2.44	12.19	58.54	26.83	5	5	0	+1	-3	+2	4.31	15.14	62.07	18.48

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 1. Lending Volume

LENDING VOLUME												
Geography: FLORIDA												
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011												
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Naples-Marco Island MSA	100.00	266	124,272	51	9,767	0	0	0	0	317	134,039	100.00

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

** The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2011.

*** Deposit Data as of April 16, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Naples-Marco Island MSA	128	100.00	2.30	2.34	13.08	34.38	47.98	21.09	36.65	42.19	0.96	9.09	4.14	0.18	0.59									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																		
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp														
Full Review:																													
Naples-Marco Island MSA	2	100.00	2.30	0.00	13.08	0.00	47.98	50.00	36.65	50.00	0.00	0.00	0.00	0.00	0.00														

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Naples-Marco Island MSA	136	100.00	2.30	0.74	13.08	9.56	47.98	28.68	36.65	61.03	0.90	0.00	1.16	0.51	1.16									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Naples-Marco Island MSA	0	0.00	2.08	0.00	7.03	0.00	35.11	0.00	55.78	0.00	0.00	0.00	0.00	0.00										

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Naples-Marco Island MSA	51	100.00	1.46	3.92	10.63	1.96	44.78	41.18	43.14	52.94	0.16	0.00	0.00	0.12	0.23									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Naples-Marco Island MSA	0	0.00	3.98	0.00	19.27	0.00	52.42	0.00	24.32	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Naples-Marco Island MSA	128	100.00	19.06	13.39	19.32	8.66	20.65	7.87	40.97	70.08	1.04	2.33	1.14	0.61	0.76									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Naples-Marco Island MSA	2	100.00	19.06	0.00	19.32	0.00	20.65	0.00	40.97	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Naples-Marco Island MSA	136	100.00	19.06	0.00	19.32	2.34	20.65	12.50	40.97	85.16	0.97	0.00	0.00	0.58	1.34									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: FLORIDA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011					
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Naples-Marco Island MSA	51	100.00	70.10	74.51	54.90	13.73	31.37	0.16	0.36

* Based on 2010 Peer Small Business Data -- US and PR

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

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

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

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Naples-Marco Island MSA	0	0.00	94.81	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 Peer Small Business Data -- US and PR

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Naples-Marco Island MSA	0	0	5	639	5	639	96.67	0	0
Other Investments:									
FL Statewide	1	14	3	8	4	22	3.33	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 BRANCHES AND BRANCH OPENINGS/CLOSINGS																	
Geography: FLORIDA																	
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Naples-Marco Island MSA	100.00	2	100.00	0.00	0.00	0.00	100.0	0	0	0	0	0	0	7.48	18.77	45.24	28.51

Table 1. Lending Volume

LENDING VOLUME												
Geography: INDIANA						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Indianapolis MSA	82.07	7,671	1,191,618	4,455	501,722	10	765	24	39,228	12,160	1,733,333	91.32
Limited Review:												
Anderson MSA	2.64	285	29,947	105	5,811	1	15	0	0	391	35,773	1.89
Fort Wayne MSA^	2.79	256	32,116	157	17,452	0	0	0	0	413	49,568	0.28
Lafayette MSA	12.51	1,488	181,511	362	33,737	1	10	2	4,270	1,853	219,528	6.51
Other CD Loans:												
IN Statewide	0.00	0	0	0	0	0	0	3	4,476	3	4,476	0.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2011.
 *** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.
 ^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: INDIANA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis MSA	2,558	77.77	3.36	2.46	19.43	15.95	44.91	39.37	32.31	42.22	1.99	6.61	5.89	1.40	1.67									
Limited Review:																								
Anderson MSA	88	2.68	2.46	1.14	13.30	13.64	52.79	48.86	31.45	36.36	1.09	0.00	0.00	1.08	1.25									
Fort Wayne MSA^	102	3.10	0.90	0.00	20.65	38.24	51.34	29.41	27.10	32.35	0.54	0.00	3.37	0.10	0.36									
Lafayette MSA	541	16.45	0.25	0.00	9.47	7.39	54.56	47.69	35.72	44.92	3.68	0.00	9.70	3.59	2.94									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: INDIANA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis MSA	150	76.14	3.36	6.00	19.43	17.33	44.91	43.33	32.31	33.33	2.46	7.41	4.08	2.12	2.11									
Limited Review:																								
Anderson MSA	13	6.60	2.46	0.00	13.30	38.46	52.79	46.15	31.45	15.38	1.79	0.00	11.11	1.75	0.00									
Fort Wayne MSA^	4	2.03	0.90	0.00	20.65	0.00	51.34	100.00	27.10	0.00	0.00	0.00	0.00	0.00	0.00									
Lafayette MSA	30	15.23	0.25	3.33	9.47	0.00	54.56	66.67	35.72	30.00	3.57	0.00	0.00	4.00	3.85									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: INDIANA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis MSA	4,962	79.86	3.36	1.29	19.43	9.45	44.91	40.53	32.31	48.73	3.55	6.77	7.26	3.68	3.13									
Limited Review:																								
Anderson MSA	184	2.96	2.46	0.00	13.30	9.78	52.79	52.17	31.45	38.04	2.26	0.00	8.20	2.59	1.60									
Fort Wayne MSA^	150	2.41	0.90	0.00	20.65	20.00	51.34	35.33	27.10	44.67	0.49	0.00	2.99	0.41	0.36									
Lafayette MSA	917	14.76	0.25	0.55	9.47	5.45	54.56	51.80	35.72	42.20	7.49	0.00	7.51	9.44	5.77									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: INDIANA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis MSA	1	100.00	7.02	0.00	32.23	0.00	46.51	100.00	14.24	0.00	0.00	0.00	0.00	0.00	0.00									
Limited Review:																								
Anderson MSA	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									
Fort Wayne MSA^	0	0.00	2.69	0.00	39.52	0.00	51.25	0.00	6.53	0.00	0.00	0.00	0.00	0.00	0.00									
Lafayette MSA	0	0.00	28.12	0.00	23.97	0.00	20.11	0.00	27.79	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of Multi Family Units is the number of multifamily 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.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: INDIANA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis MSA	4,455	87.71	2.61	3.82	14.51	14.03	45.58	47.74	37.24	34.41	5.43	7.32	7.24	5.98	4.53									
Limited Review:																								
Anderson MSA	105	2.07	1.89	0.00	15.20	18.10	53.86	68.57	29.05	13.33	2.08	0.00	2.99	2.81	0.94									
Fort Wayne MSA^	157	3.09	1.20	0.64	23.69	28.03	45.24	40.13	29.71	31.21	1.46	0.00	1.88	1.39	1.45									
Lafayette MSA	362	7.13	4.47	2.49	25.04	27.07	38.52	43.37	31.76	27.07	4.95	8.33	5.25	6.82	2.88									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: INDIANA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis MSA	10	83.33	1.30	0.00	9.67	10.00	57.19	60.00	31.84	30.00	1.82	0.00	0.00	1.48	4.35									
Limited Review:																								
Anderson MSA	1	8.33	0.54	0.00	3.93	0.00	50.71	0.00	44.82	100.00	0.00	0.00	0.00	0.00	0.00									
Fort Wayne MSA^	0	0.00	0.00	0.00	9.11	0.00	64.83	0.00	26.06	0.00	0.00	0.00	0.00	0.00	0.00									
Lafayette MSA	1	8.33	0.16	0.00	5.31	0.00	58.28	0.00	36.25	100.00	1.20	0.00	0.00	0.00	4.17									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: INDIANA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Indianapolis MSA	2,558	77.77	19.35	13.95	18.40	26.17	22.75	22.85	39.50	37.03	2.24	2.46	2.01	1.90	2.59	
Limited Review:																
Anderson MSA	88	2.68	18.05	19.32	19.37	25.00	23.21	26.14	39.38	29.55	1.32	1.64	0.85	1.67	1.43	
Fort Wayne MSA^	102	3.10	18.38	36.63	18.88	14.85	24.17	19.80	38.57	28.71	0.70	1.29	0.43	0.43	0.66	
Lafayette MSA	541	16.45	18.42	14.18	18.69	29.85	23.75	26.87	39.15	29.10	4.28	2.64	3.32	5.83	4.73	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: INDIANA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis MSA	150	76.14	19.35	15.65	18.40	23.81	22.75	21.77	39.50	38.78	2.62	3.70	3.26	2.93	1.83									
Limited Review:																								
Anderson MSA	13	6.60	18.05	30.77	19.37	15.38	23.21	23.08	39.38	30.77	2.00	10.53	0.00	0.00	0.00									
Fort Wayne MSA^	4	2.03	18.38	0.00	18.88	50.00	24.17	25.00	38.57	25.00	0.00	0.00	0.00	0.00	0.00									
Lafayette MSA	30	15.23	18.42	16.67	18.69	6.67	23.75	43.33	39.15	33.33	3.88	0.00	5.00	0.00	5.63									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE																
Geography: INDIANA																
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011																
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
Full Review:																
Indianapolis MSA	4,962	79.86	19.35	9.23	18.40	19.51	22.75	24.59	39.50	46.67	4.14	6.21	4.73	4.37	3.58	
Limited Review:																
Anderson MSA	184	2.96	18.05	13.89	19.37	16.67	23.21	25.56	39.38	43.89	2.83	2.29	2.75	2.68	3.07	
Fort Wayne MSA^	150	2.41	18.38	9.66	18.88	28.28	24.17	24.14	38.57	37.93	0.62	0.38	1.23	0.52	0.46	
Lafayette MSA	917	14.76	18.42	8.13	18.69	19.08	23.75	33.45	39.15	39.34	8.51	8.72	9.87	10.34	7.00	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 5.1% of loans originated and purchased by bank.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: INDIANA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011					
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Indianapolis MSA	4,455	87.71	65.44	65.14	79.82	8.24	11.94	5.43	12.37
Limited Review:									
Anderson MSA	105	2.07	68.27	85.71	91.43	5.71	2.86	2.08	4.29
Fort Wayne MSA^	157	3.09	65.89	63.06	78.34	8.28	13.38	1.46	2.07
Lafayette MSA	362	7.13	64.32	74.31	82.87	9.12	8.01	4.95	10.74

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.23% of small loans to businesses originated and purchased by the bank.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: INDIANA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Indianapolis MSA	10	83.33	97.68	70.00	80.00	10.00	10.00	1.82	0.93
Limited Review:									
Anderson MSA	1	8.33	99.11	100.00	100.00	0.00	0.00	0.00	0.00
Fort Wayne MSA^	0	0.00	97.67	0.00	0.00	0.00	0.00	0.00	0.00
Lafayette MSA	1	8.33	97.66	0.00	100.00	0.00	0.00	1.20	0.00

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 16.67% of small loans to farms originated and purchased by the bank.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: INDIANA									
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Indianapolis MSA	3	512	135	17,814	138	18,326	48.84	0	0
Limited Review:									
Anderson MSA	3	91	5	493	8	584	1.56	0	0
Fort Wayne MSA^	0	0	2	605	2	605	1.61	0	0
Lafayette MSA	1	34	6	1,070	7	1,104	2.94	0	0
Other Investments:									
IN Statewide	3	109	13	16,792	16	16,901	45.05	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.

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

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

DISTRIBUTION OF BRANCHES AND BRANCH OPENINGS/CLOSINGS																	
Geography: INDIANA																	
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Indianapolis MSA	91.32	46	86.79	4.35	13.04	52.17	30.44	5	9	0	+1	-5	0	5.40	24.26	42.80	27.55
Limited Review:																	
Anderson MSA	1.89	2	3.77	0.00	50.00	50.00	0.00	0	0	0	0	0	0	2.80	16.93	52.62	27.64
Fort Wayne MSA^	0.28	1	1.89	0.00	0.00	0.00	100.0	0	0	0	0	0	0	1.69	26.55	48.24	23.42
Lafayette MSA	6.51	4	7.55	0.00	25.00	50.00	25.00	0	0	0	0	0	0	11.66	13.40	41.74	28.61

^ The evaluation period for this assessment area is July 1, 2007 to December 31, 2011.

Table 1. Lending Volume

LENDING VOLUME		Geography: PENNSYLVANIA				Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Pittsburgh MSA	79.10	4,571	592,946	2,362	185,448	10	741	22	52,346	6,965	831,481	87.93
Limited Review:												
Erie MSA	7.36	472	54,457	169	11,513	2	154	5	6,425	648	72,549	3.16
Lawrence County	13.54	912	100,259	268	26,119	3	160	9	12,813	1,192	139,351	8.91
Other CD Loans:												
PA Statewide	0.00	0	0	0	0	0	0	5	5,439	5	5,439	0.00

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

** The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2011.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: PENNSYLVANIA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Pittsburgh MSA	1,210	78.37	1.24	0.91	13.40	22.40	56.83	47.60	28.54	29.09	1.15	0.00	5.13	0.92	0.66									
Limited Review:																								
Erie MSA	126	8.16	1.45	0.00	10.88	18.25	59.21	50.79	28.47	30.95	1.27	0.00	3.70	1.01	1.08									
Lawrence County	208	13.47	2.17	0.00	6.94	8.17	73.60	66.35	17.29	25.48	6.48	0.00	13.51	5.04	9.43									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: PENNSYLVANIA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Pittsburgh MSA	302	82.29	1.24	0.99	13.40	14.90	56.83	65.23	28.54	18.87	1.04	2.63	1.39	1.02	0.91									
Limited Review:																								
Erie MSA	24	6.54	1.45	0.00	10.88	8.33	59.21	66.67	28.47	25.00	0.81	0.00	0.97	0.80	0.78									
Lawrence County	41	11.17	2.17	0.00	6.94	4.88	73.60	73.17	17.29	21.95	5.85	0.00	11.11	5.52	6.25									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: PENNSYLVANIA															
Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Pittsburgh MSA	3,055	75.64	1.24	0.26	13.40	9.72	56.83	54.63	28.54	35.38	2.24	4.29	5.81	2.56	1.61
Limited Review:															
Erie MSA	322	7.97	1.45	0.31	10.88	7.76	59.21	53.42	28.47	38.51	2.26	20.00	4.92	2.28	1.92
Lawrence County	662	16.39	2.17	0.15	6.94	2.27	73.60	66.62	17.29	30.97	15.81	0.00	16.67	15.79	16.02

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: PENNSYLVANIA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Pittsburgh MSA	4	80.00	10.85	0.00	21.45	0.00	40.08	50.00	27.62	50.00	0.63	0.00	0.00	1.41	0.00									
Limited Review:																								
Erie MSA	0	0.00	15.44	0.00	21.13	0.00	36.83	0.00	26.60	0.00	0.00	0.00	0.00	0.00	0.00									
Lawrence County	1	20.00	19.59	0.00	26.45	100.00	28.99	0.00	24.97	0.00	20.00	0.00	100.00	0.00	0.00									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: PENNSYLVANIA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Pittsburgh MSA	2,358	84.36	2.81	2.37	13.19	14.63	47.16	53.18	36.71	29.81	3.37	3.12	4.31	3.79	2.72									
Limited Review:																								
Erie MSA	169	6.05	5.99	4.14	14.33	10.65	53.62	63.31	26.06	21.89	2.02	1.12	1.57	2.34	1.84									
Lawrence County	268	9.59	7.48	7.46	9.01	12.69	60.73	56.72	22.78	23.13	11.03	17.14	11.34	11.65	8.58									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: PENNSYLVANIA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Pittsburgh MSA	10	66.67	0.60	0.00	7.26	0.00	66.50	100.00	25.62	0.00	7.89	0.00	0.00	10.53	0.00									
Limited Review:																								
Erie MSA	2	13.33	1.08	0.00	3.13	0.00	74.76	100.00	21.03	0.00	4.55	0.00	0.00	5.00	0.00									
Lawrence County	3	20.00	0.77	0.00	1.92	0.00	77.78	100.00	19.54	0.00	14.29	0.00	0.00	16.67	0.00									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: PENNSYLVANIA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Pittsburgh MSA	1,210	78.37	18.48	13.10	18.32	26.45	22.02	22.42	41.18	38.04	1.24	2.23	1.53	0.94	1.01	
Limited Review:																
Erie MSA	126	8.16	18.52	9.76	18.90	28.46	23.47	26.83	39.12	34.96	1.36	0.74	1.07	1.88	1.35	
Lawrence County	208	13.47	18.03	14.50	19.37	28.50	23.21	27.00	39.39	30.00	6.72	7.62	5.29	7.05	7.32	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: PENNSYLVANIA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Pittsburgh MSA	302	82.29	18.48	14.24	18.32	23.84	22.02	28.15	41.18	33.77	1.07	1.52	0.89	1.34	0.87	
Limited Review:																
Erie MSA	24	6.54	18.52	26.09	18.90	21.74	23.47	30.43	39.12	21.74	0.70	0.98	0.54	1.76	0.00	
Lawrence County	41	11.17	18.03	4.88	19.37	21.95	23.21	26.83	39.39	46.34	6.79	0.00	10.00	2.63	9.59	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: PENNSYLVANIA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Pittsburgh MSA	3,055	75.64	18.48	8.85	18.32	19.57	22.02	27.64	41.18	43.93	2.36	4.95	3.23	2.80	1.78	
Limited Review:																
Erie MSA	322	7.97	18.52	8.31	18.90	24.28	23.47	25.88	39.12	41.53	2.35	4.69	3.80	3.17	1.26	
Lawrence County	662	16.39	18.03	6.65	19.37	18.55	23.21	27.67	39.39	47.14	16.89	20.99	20.10	15.81	15.65	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PENNSYLVANIA			Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Pittsburgh MSA	2,362	84.39	62.57	69.26	86.28	7.11	6.60	3.37	5.34
Limited Review:									
Erie MSA	169	6.04	65.43	78.70	85.80	7.69	6.51	2.02	3.57
Lawrence County	268	9.57	68.07	69.78	80.60	10.82	8.58	11.03	19.15

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 9.93% 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: PENNSYLVANIA									
Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Pittsburgh MSA	10	66.67	97.38	60.00	80.00	10.00	10.00	7.89	8.51
Limited Review:									
Erie MSA	2	13.33	98.32	100.00	100.00	0.00	0.00	4.55	6.25
Lawrence County	3	20.00	100.00	66.67	100.00	0.00	0.00	14.29	0.00

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 26.67% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: PENNSYLVANIA									
Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Pittsburgh MSA	0	0	77	14,891	77	14,891	95.89	3	147
Limited Review:									
Erie MSA	0	0	1	138	1	138	0.89	0	0
Lawrence County	0	0	4	360	4	360	2.32	0	0
Other Investments:									
PA Statewide	0	0	5	140	5	140	0.90	0	0

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

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

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

DISTRIBUTION OF BRANCHS AND BRANCH OPENINGS/CLOSINGS																	
Geography: PENNSYLVANIA																	
Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2011																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Pittsburgh MSA	87.93	44	78.57	2.27	20.46	45.45	31.82	2	2	0	-1	-1	+2	2.97	16.21	53.49	27.34
Limited Review:																	
Erie MSA	3.16	4	7.14	25.00	0.00	50.00	25.00	0	0	0	0	0	0	4.40	16.81	53.86	24.93
Lawrence County	8.91	8	14.29	12.50	0.00	62.50	25.00	0	1	0	0	-1	0	4.26	9.29	68.72	17.73

Table 1. Lending Volume

LENDING VOLUME		Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Charleston MSA	26.60	1,846	241,177	1,080	125,775	1	8	4	2,840	2,931	369,800	33.83
Limited Review:												
Huntington MSA	9.32	647	70,314	374	33,627	0	0	6	9,463	1,027	113,404	6.80
Morgantown MSA	26.99	2,414	414,255	555	63,903	2	44	3	3,070	2,974	481,272	21.74
Parkersburg MSA	3.60	287	30,168	109	10,120	0	0	1	35	397	40,323	6.56
West Virginia Non-MSA	33.48	2,729	283,173	946	92,529	10	1,046	4	520	3,689	377,268	31.07
Other CD Loans:												
WV Statewide	0.00	0	0	0	0	0	0	3	932	3	932	0.00

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

** The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2011.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Charleston MSA	712	23.86	0.12	0.14	7.43	5.76	64.46	54.07	27.98	40.03	5.61	0.00	13.33	5.09	5.58
Limited Review:															
Huntington MSA	235	7.88	0.25	0.00	19.22	14.89	55.81	46.81	24.72	38.30	5.29	0.00	7.77	4.82	5.40
Morgantown MSA	1,033	34.62	0.00	0.00	11.81	11.81	40.55	24.88	47.65	63.31	18.02	0.00	15.43	16.58	19.32
Parkersburg MSA	127	4.26	0.00	0.00	11.15	14.17	72.50	66.93	16.35	18.90	2.18	0.00	3.80	1.82	2.61
West Virginia Non-MSA	877	29.39	0.00	0.00	2.13	2.39	75.94	68.53	21.93	29.08	11.16	0.00	5.26	12.64	9.62

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****					
Full Review:															
Charleston MSA	155	25.08	0.12	0.00	7.43	3.23	64.46	53.55	27.98	43.23	6.56	0.00	0.00	4.95	9.95
Limited Review:															
Huntington MSA	55	8.90	0.25	0.00	19.22	9.09	55.81	69.09	24.72	21.82	1.68	0.00	5.41	1.12	1.22
Morgantown MSA	139	22.49	0.00	0.00	11.81	11.51	40.55	38.13	47.65	50.36	17.45	0.00	15.00	27.27	12.94
Parkersburg MSA	14	2.27	0.00	0.00	11.15	21.43	72.50	57.14	16.35	21.43	1.89	0.00	0.00	2.50	0.00
West Virginia Non-MSA	255	41.26	0.00	0.00	2.13	2.35	75.94	74.51	21.93	23.14	12.76	0.00	25.00	12.80	12.00

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: WEST VIRGINIA															
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Charleston MSA	978	22.68	0.12	0.20	7.43	5.93	64.46	55.42	27.98	38.45	6.99	33.33	14.17	7.19	6.12
Limited Review:															
Huntington MSA	355	8.23	0.25	0.56	19.22	8.73	55.81	58.87	24.72	31.83	6.01	10.00	8.05	6.34	4.96
Morgantown MSA	1,238	28.70	0.00	0.00	11.81	10.42	40.55	28.35	47.65	61.23	18.54	0.00	23.78	19.29	17.57
Parkersburg MSA	146	3.39	0.00	0.00	11.15	12.33	72.50	65.07	16.35	22.60	3.41	0.00	8.97	3.14	2.34
West Virginia Non-MSA	1,596	37.00	0.00	0.00	2.13	2.07	75.94	72.62	21.93	25.31	19.98	0.00	22.22	25.09	12.63

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Charleston MSA	1	12.50	7.19	0.00	10.74	0.00	46.18	100.00	35.89	0.00	3.70	0.00	0.00	9.09	0.00									
Limited Review:																								
Huntington MSA	2	25.00	22.34	0.00	23.18	50.00	24.07	50.00	30.40	0.00	4.76	0.00	100.00	0.00	0.00									
Morgantown MSA	4	50.00	0.00	0.00	19.71	75.00	22.92	25.00	57.37	0.00	3.33	0.00	0.00	10.00	0.00									
Parkersburg MSA	0	0.00	0.00	0.00	31.53	0.00	58.43	0.00	10.04	0.00	0.00	0.00	0.00	0.00	0.00									
West Virginia Non-MSA	1	12.50	0.00	0.00	11.91	0.00	66.66	100.00	21.43	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of Multi Family Units is the number of multifamily 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: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Charleston MSA	1,080	35.25	10.53	6.57	9.18	14.26	49.69	53.15	30.60	26.02	7.88	4.71	12.26	9.90	6.30									
Limited Review:																								
Huntington MSA	374	12.21	11.69	10.96	15.51	17.11	43.72	51.07	29.08	20.86	7.68	6.84	9.82	10.56	4.93									
Morgantown MSA	555	18.11	0.00	0.00	17.59	20.54	33.29	35.50	49.12	43.96	9.06	0.00	8.87	13.16	7.21									
Parkersburg MSA	109	3.56	0.00	0.00	21.69	45.87	65.28	43.12	13.03	11.01	3.37	0.00	3.88	3.13	5.00									
West Virginia Non-MSA	946	30.87	0.00	0.00	5.59	8.35	68.72	62.05	25.70	29.60	13.14	0.00	20.00	15.44	12.30									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Charleston MSA	1	7.69	1.56	0.00	6.54	0.00	61.06	100.00	30.84	0.00	0.00	0.00	0.00	0.00	0.00									
Limited Review:																								
Huntington MSA	0	0.00	1.43	0.00	11.90	0.00	66.19	0.00	20.48	0.00	0.00	0.00	0.00	0.00	0.00									
Morgantown MSA	2	15.38	0.00	0.00	20.89	0.00	32.28	100.00	46.84	0.00	0.00	0.00	0.00	0.00	0.00									
Parkersburg MSA	0	0.00	0.00	0.00	13.49	0.00	70.70	0.00	15.81	0.00	0.00	0.00	0.00	0.00	0.00									
West Virginia Non-MSA	10	76.92	0.00	0.00	2.58	0.00	75.93	80.00	21.49	20.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2010 Peer Small Business Data -- US and PR

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Charleston MSA	712	23.86	18.91	10.14	16.87	24.93	20.28	24.64	43.94	40.29	6.05	8.14	8.37	5.51	4.89	
Limited Review:																
Huntington MSA	235	7.88	22.95	12.45	17.81	25.32	20.14	22.75	39.11	39.48	5.58	9.23	7.32	4.51	4.87	
Morgantown MSA	1,033	34.62	18.60	2.25	17.16	11.34	19.68	28.35	44.57	58.06	21.94	5.00	17.65	21.32	23.64	
Parkersburg MSA	127	4.26	19.28	12.80	19.02	21.60	21.78	22.40	39.91	43.20	2.38	1.14	1.81	2.12	3.32	
West Virginia Non-MSA	877	29.39	17.85	5.57	16.67	14.50	20.63	28.07	44.85	51.86	12.24	13.64	11.43	14.54	11.33	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Charleston MSA	155	25.08	18.91	10.53	16.87	15.79	20.28	17.11	43.94	56.58	6.90	3.77	6.14	7.08	7.81									
Limited Review:																								
Huntington MSA	55	8.90	22.95	7.41	17.81	16.67	20.14	35.19	39.11	40.74	1.72	5.56	2.08	1.39	0.75									
Morgantown MSA	139	22.49	18.60	8.03	17.16	12.41	19.68	19.71	44.57	59.85	20.16	8.33	16.67	20.83	22.37									
Parkersburg MSA	14	2.27	19.28	21.43	19.02	7.14	21.78	28.57	39.91	42.86	1.96	0.00	0.00	3.33	3.13									
West Virginia Non-MSA	255	41.26	17.85	9.52	16.67	11.90	20.63	25.00	44.85	53.57	13.14	9.52	11.32	13.56	14.18									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: WEST VIRGINIA					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Charleston MSA	978	22.68	18.91	5.63	16.87	11.90	20.28	22.74	43.94	59.72	7.78	8.70	7.28	7.75	7.84	
Limited Review:																
Huntington MSA	355	8.23	22.95	5.41	17.81	16.81	20.14	23.08	39.11	54.70	6.61	4.49	7.88	6.09	6.67	
Morgantown MSA	1,238	28.70	18.60	3.87	17.16	10.86	19.68	19.75	44.57	65.51	23.07	27.03	19.58	24.41	23.08	
Parkersburg MSA	146	3.39	19.28	6.99	19.02	11.89	21.78	24.48	39.91	56.64	3.72	5.26	1.91	6.17	2.80	
West Virginia Non-MSA	1,596	37.00	17.85	5.76	16.67	11.45	20.63	23.10	44.85	59.69	22.11	40.00	30.05	27.91	18.37	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WEST VIRGINIA			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Charleston MSA	1,080	35.25	59.31	63.70	78.24	8.61	13.15	7.88	12.81
Limited Review:									
Huntington MSA	374	12.21	59.87	70.05	82.62	8.29	9.09	7.68	13.65
Morgantown MSA	555	18.11	54.62	71.53	75.86	8.65	15.50	9.06	13.58
Parkersburg MSA	109	3.56	55.60	70.64	77.06	11.01	11.93	3.37	7.28
West Virginia Non-MSA	946	30.87	56.49	72.83	80.44	9.51	10.04	13.14	24.96

* Based on 2010 Peer Small Business Data -- US and PR

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.42% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WEST VIRGINIA			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Charleston MSA	1	7.69	97.51	100.00	100.00	0.00	0.00	0.00	0.00
Limited Review:									
Huntington MSA	0	0.00	97.14	0.00	0.00	0.00	0.00	0.00	0.00
Morgantown MSA	2	15.38	99.37	100.00	100.00	0.00	0.00	0.00	0.00
Parkersburg MSA	0	0.00	98.60	0.00	0.00	0.00	0.00	0.00	0.00
West Virginia Non-MSA	10	76.92	98.28	100.00	80.00	0.00	20.00	0.00	0.00

* Based on 2010 Peer Small Business Data -- US and PR

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: WEST VIRGINIA									
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Charleston MSA	3	58	29	5,005	32	5,063	50.47	0	0
Limited Review:									
Huntington MSA	1	299	7	1,847	8	2,146	21.39	0	0
Morgantown MSA	0	0	12	1,039	12	1,039	10.36	0	0
Parkersburg MSA	0	0	4	2	4	2	0.02	0	0
West Virginia Non-MSA	3	64	21	97	24	161	1.60	0	0
Other Investments:									
WV Statewide	2	88	2	1,533	4	1,621	16.16	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 BRANCHES AND BRANCH OPENINGS/CLOSINGS																	
Geography: WEST VIRGINIA																	
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2011																	
Assessment Area:	Deposits		Branches					Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Charleston MSA	33.82	8	25.00	25.00	12.50	50.00	12.50	0	0	0	0	0	0	0.57	8.69	63.45	27.30
Limited Review:																	
Huntington MSA	6.80	3	9.38	33.33	0.00	33.34	33.33	0	0	0	0	0	0	3.89	21.82	51.12	23.18
Morgantown MSA	21.74	7	21.88	0.00	14.29	71.43	14.28	2	0	0	0	+2	0	0.00	19.06	39.09	41.85
Parkersburg MSA	6.56	1	3.12	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	14.19	71.22	14.59
West Virginia Non-MSA	31.07	13	40.62	0.00	15.38	61.54	23.08	1	1	0	0	0	0	0.00	3.47	75.57	20.95