



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

TD Bank, NA
Charter Number: 24096

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Wilmington, Delaware 19808

Office of the Comptroller of the Currency

Large Bank Supervision
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Washington, DC 20219-0001

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

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Overall CRA Rating

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

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

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

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- TDBNA’s lending performance is excellent. There is an excellent distribution of loans by income level of the borrower, excellent lending activity, and an excellent level of Community Development Lending that had a significantly positive impact on the rating resulting in an Outstanding for the Lending Test. Geographic distribution is assessed as adequate, with good Home Mortgage Disclosure Act (HMDA) loan distribution and adequate small business loan distributions.
- TDBNA’s overall investment performance is excellent. The bank’s performance was consistently excellent throughout its assessment areas based on volume of investments and meeting the needs of the community. Additionally, in almost all areas that received limited-scope reviews, TDBNA’s performance was not inconsistent with the area receiving a full-scope review. TDBNA remained an active investor in low-income housing tax credits during the evaluation period.
- TDBNA’s overall performance under the Service Test is good. The branch network is accessible to geographies and individuals of different income levels in the bank’s assessment areas. A good level of community development services was found in all of the rating areas. Most of the community development services focused on financial education, homeownership counseling/buying programs, and small business development workshops.

Definitions and Common Abbreviations

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income (LMI) 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 LMI 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) LMI geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved non-metropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of LMI 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 refinancing, 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% 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% of the area median income, or a median family income that is less than 50%, in the case of a geography.

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

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

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

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

Metropolitan Statistical Area (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% and less than 120% of the area median income, or a median family income that is at least 80% and less than 120%, in the case of a geography.

Moderate-Income: Individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80%, 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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

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

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

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

Description of Institution

TD Bank, N.A. (TDBNA), with its main office in Wilmington, Delaware, is the principal subsidiary of TD Bank US Holding Company (TDBHC), a \$201 billion bank holding company headquartered in Portland, Maine. TDBHC, which also owns TD Bank USA, N.A., is part of the larger TD Bank Group, headquartered in Toronto, Canada and is ranked as the 15th largest bank holding company in the United States by assets as of December 31, 2011.¹

Since the prior CRA evaluation, the bank has grown substantially through de novo branching and acquisitions. As of December 31, 2011, TDBNA had \$189 billion in assets, \$153 billion in deposits, and \$13 billion in net Tier One capital. For analysis purposes, we considered only domestic deposits and excluded approximately \$38 billion of deposits that are swept into TDBNA from the bank's broker affiliate, TD Ameritrade. These deposits are housed in the bank's main office in Delaware on behalf of TD Ameritrade clients that are spread across the country. The bank does not track the origination of these deposits to a specific branch location or city. The net Tier One capital was adjusted proportionally for use in our analysis. Total loans represent 43% of total assets with the loan portfolio broken out as follows: real estate 58%, commercial 22%, consumer 16%, and 4% all other loans.

TDBNA is an interstate bank with a network of over 1,000 branches in twelve states (Connecticut, Delaware, Florida, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Vermont, Virginia) and the District of Columbia. In mid- to late 2010, the bank further expanded into Rhode Island, North and South Carolina and a substantial portion of Florida through de novo branching and acquisitions. The assessment areas created by this expansion were established near the end of the evaluation period and were not included in our analysis. For this evaluation, the bank has delineated 46 assessment areas. There are five multistate areas in which the bank operates in two or more states and these multistate areas are rated separately from the states in which they are located.

TDBNA provides consumers, corporations, governments and institutions with a broad range of financial products and services, including consumer/business banking and credit, corporate and investment banking, insurance, securities brokerage, transaction services and wealth management.

TDBNA requested that grants made by the TD Charitable Foundation, an affiliate of the bank, and investments made through TD Community Development Corporation, a subsidiary of the bank, be considered in our evaluation. There are no subsidiaries or affiliates that negatively impacted the bank's capacity to lend or invest in its communities.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its communities. At the previous CRA evaluation, issued December 8, 2008, the bank was rated Outstanding.

¹ Federal Reserve System, National Information Center

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation considered TDBNA's HMDA-reportable loans (home purchase, home improvement, and home refinance), small loans to businesses, and retail services for the calendar years 2008, 2009, and 2010. CD investments and CD services were evaluated for the period January 1, 2009 to December 31, 2011. CD lending was evaluated for the period January 1, 2008 to December 31, 2011.

TDBNA's volume of small loans to farms and multifamily loans was insignificant, which precludes any meaningful analysis and conclusion. Small loans to farms and multifamily loans are not part of the bank's strategic focus. Accordingly, these products were not evaluated, nor included in our analysis. Data is presented in the tables in Appendix D for informational purposes.

Data Integrity

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

Selection of Areas for Full-Scope Review

We completed a full-scope review in one AA in each state in which TDBNA has an office. The area selected was typically the MSA that contained the largest percentage of TDBNA deposits within that state. Refer to the "Description of Institution's Operations" section under each State Rating for details regarding how the areas were selected. We completed a full-scope review in every multistate Metropolitan Area (MMA) in which the bank has branches in more than one state as required by the regulation.

Ratings

The bank's overall rating is a blend of the MMA ratings and state ratings. Six primary rating areas carried the greatest weight in our conclusions due to these areas representing the bank's most significant markets in terms of deposit concentrations, 77%. Primary rating areas are defined in the table of contents under primary rating areas with descriptions of each MMA or state provided in the market profiles.

The MMA ratings and state ratings are based primarily on those areas that received full-scope reviews, but the bank's performance in areas receiving limited-scope reviews is also considered. Refer to the "Description of Institution's Operations" section under each State and MMA Rating section for details regarding details on the areas.

Community Contacts

OCC District Community Affairs Officers updated or completed contacts specifically related to this evaluation in key AAs during 2011. Additionally, we reviewed information from contacts made during 2008, 2009, and 2010 with community groups, local government leaders, realtors, or business leaders within the bank's various AAs. These interviews were made with low-income housing specialists, community action groups, small business development organizations, and social service groups. Relevant comments were included as appropriate in our performance context considerations. Information from community contacts for the Primary Rating Areas is summarized, as needed, in the Community Profiles found in Appendix C.

Other Information

Assessment Areas – We determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that the bank's branches could service and did not arbitrarily exclude any low- or moderate-income (LMI) areas.

Inside/Outside Ratio – We considered the volume of loans made inside TDBNA's AAs a positive factor in our evaluation of lending performance. We analyzed the volume of bank loan originations and purchases within the bank's AAs versus those made outside the bank's AAs at the bank level. Our conclusions in this area were based solely on bank originations and purchases and did not include any affiliate data.

At the bank level, 96% of all mortgage (93% home purchase, 98% home improvement, and 96% of refinancing) and 97% of small business loans were made within TDBNA's AAs. Overall, we considered this performance to be excellent.

Flexible Loan Programs – The bank's flexible products include two residential mortgage products, Right Step Loan and the FHA fixed rate program, and a commercial revolving line of credit for acquisition-predevelopment of commercial real estate. The commercial revolving line was launched late in the evaluation period and there were no originations. The Right Step Loan was piloted with the Massachusetts Housing Alliance and originations occurred in six AAs during the evaluation period. FHA loan originations occurred in all of the AAs. In those areas where these programs had positive impact, it is noted within the Lending Test of the respective AA.

Lending Test

For the various loan products considered under the Lending Test, we gave slightly more weight to small business loans than home mortgages in developing our conclusions. Within the mortgage loan category home refinance lending was given greater weight given the proportion of loans made during the evaluation period. While a few of the bank's smaller markets made a sufficient number of small farm loans to analyze, the substantial majority had very few. The same applies to multifamily lending. As a result, we did not analyze small farm or multifamily products. In markets where the bank did originate these loans, information is provided in the tables in Appendix D.

We gave equal weighting to the geographic and borrower distribution components of the Lending Test. The volume of community development loans and the degree of responsiveness of those loans to the needs in the community were considered positively in the lending evaluation. The lack of community development lending had neutral impact on the Lending Test ratings. In situations where the bank's community development lending positively impacted the rating, it is described in the conclusions for the rating area.

In most markets, we did not analyze or draw conclusions on a particular loan product if less than fifty loans were made during the evaluation period. Generally, we found that analysis on fewer than fifty loans did not provide meaningful conclusions. An exception was made for our analysis for the state of Delaware because of the limited banking presence.

In our analysis of the distribution of loans to geographies with different income levels, we gave greater consideration to the bank's performance in moderate-income tracts if there were a limited number of owner-occupied housing units or businesses in the low-income tracts. For borrower distribution, we considered the impact that poverty levels had on the demand for mortgages from low-income individuals, and the affordability of housing in some markets.

Investment Test

Primary consideration was given to the volume of investments and grants made during the current evaluation period. We also evaluated how responsive the investments were to identified community development needs. Secondary consideration was given to investments that were made in prior evaluation periods that remain outstanding. Investments made in TDBNA's broader regional areas that include the bank's AAs were also considered.

Service Test

Primary consideration was given to TDBNA's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- and upper-income areas that are nearby LMI areas, i.e. within 0.5 miles of the LMI geographies. We did not evaluate the bank's alternative distribution channels, internet and phone banking because there is no data on how these products serve LMI individuals.

Where TDBNA opened or closed branches within an AA, the overall impact of the changes was evaluated. If no branches were opened or closed in an AA, we did not include that performance element in our analysis. We evaluated the range of services and products offered by all of the bank's branches. Services and products offered at branches are consistent throughout the branch network. We specifically focused on any differences in branch hours and services in LMI geographies compared to those in middle- or upper-income geographies. Almost all of the bank's branches are open Saturdays and Sundays for an average of 6 hours each day including branches in LMI geographies. Banking hours are good and do not vary in a way that inconveniences people within the AA.

The bank's record of providing community development services was evaluated in AAs that received full-scope reviews. Our primary consideration in these reviews was the responsiveness to the needs of the community. Services that reflected ongoing relationships

with organizations involved in community development received the most consideration in our analysis.

The bank offers several community development services that benefit multiple AAs, or in some cases, nationally. This includes TD Bank WOW! Zone a comprehensive financial literacy program created by TD Bank and written to national standards. The TD Bank WOW! Zone website also offered a number of 24/7 small business development workshops. In 2010, TDBNA was recognized by the Financial Services Roundtable for providing the most financial education activity for that year.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any AA by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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

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

New York-Northern NJ-Long Island, NY-NJ-PA Multistate Metropolitan Area

CRA rating for the MMSA¹:	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:

- Excellent lending activity, combined with good borrower distribution and a significantly positive impact from CD lending resulted in excellent performance in the full-scope area. Geographic distribution is overall considered adequate due to excellent HMDA distribution being offset by poor small business loan distribution.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Good Service Test performance was demonstrated by the distribution of branches across the MMA. Bank employees provided a good level of Community Development (CD) services.

Description of Institution's Operations in New York- Northern NJ- Long Island NY-NJ-PA MMA

TDBNA's operations in the New York-Northern NJ-Long Island MMA consist of four metropolitan divisions (MD): New York-White Plains-Wayne, NY-NJ; Edison; Nassau-Suffolk; and Newark-Union. As of June 30, 2010, TDBNA deposits in the MMA totaled \$34 billion, representing nearly 42% of deposits. In terms of deposit market share, TDBNA ranks eighth with a 3.6% share compared to 31.5% for JPMorgan Chase, the largest financial institution in the MMA. There are 240 FDIC insured depository institutions in the geographic area, providing strong competition for the bank. Within this MMA, the bank operates 341 branches.

In evaluating the multistate area, we conducted a full-scope analysis of the New York-Wayne-White Plains MD as this area contains the largest number of loans, deposits, and branches. Limited-scope analyses were conducted for the Edison, Nassau-Suffolk, and Newark-Union MDs.

In evaluating the bank's performance, we considered the significant affordability barriers that exist in the metropolitan NYC housing market. Although the economic downturn during the evaluation period impacted the market, home prices still remained fairly high. In the fourth quarter of 2010, the median home price in the New York-Wayne-White Plains MD was \$425 thousand.

¹ This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Refer to the market profile for the New York-White Plains-Wayne, NY-NJ MD in Appendix C for performance context information.

LENDING TEST

Lending performance in the full-scope New York-Wayne-White Plains MD is excellent. Lending performance in the limited-scope AAs did not have an impact on the Lending Test rating in the MMA.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is excellent. Although lending market shares for home purchase and home refinance are below its deposit share, TDBNA achieved high rankings and excellent loan volume for all mortgage categories and small business lending despite very strong competition. In home improvement lending, TDBNA ranked 2nd with over a 12% market share. There are nearly 200 home improvement lenders in the market. There are over 400 lenders for both home purchase and refinance loans and 211 small business lenders in the market. Many of these lenders are non-depository taking institutions, which skews the bank's lending market shares when compared to the bank's deposit market share. Within small business lending, four nationwide credit card lenders dominate the market with a combined market share of nearly 79%. American Express Bank, ranked first, had a market share of nearly 47%.

Distribution of Loans by Income Level of the Geography - The geographic distribution of loan products is adequate. This is the result of excellent distribution of home purchase and home refinance loans, good distribution of home improvement loans, and poor distribution of small loans to businesses. Small business is poor because of very poor performance in low-income areas with adequate performance in the moderate-income areas. Market shares demonstrated similar performance for small business lending in LMI areas. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans to borrowers of different income levels is good. The distribution of home mortgage loans is adequate, considering the impact that the economic downturn had on housing, the high cost of housing, the fact that the majority (62%) of housing is rental, and the high household poverty level of 12% in the AA. Recent data from the National Association of Realtors (NAR) shows that the median sales price of an existing single family home in the AA is \$425 thousand. The updated median family income for the AA indicates that a low-income individual earns less than \$32 thousand a year and a moderate-income person earns less than \$52 thousand a year making homeownership very difficult for most LMI borrowers. The distribution of loans to businesses of different revenue sizes is excellent.

Community Development Lending - CD lending had a significantly positive impact on lending performance in the MMA because of the volume and responsiveness to community development needs. Within the New York-Wayne-White Plains MD, TDBNA made 43 CD loans totaling \$127.1 million, an increase of over \$120 million from the previous evaluation period. The current volume represents 7.5% of allocated Tier One Capital. Measured in dollars, 57% of these efforts provided 850 units of affordable housing for LMI residents, 24%

provided CD services, 10% resulted in neighborhood revitalization or stabilization, and 9% were for economic development. Examples include a \$6.7 million construction loan for 59 units of LMI senior apartments in Jersey City and three construction loans totaling \$5.1 million for rehabilitation of five residential buildings containing 63 LMI units in East Harlem, New York. The project was completed in conjunction with the NYC Department of Housing Preservation and an equity investment in Low Income Housing Income Tax Credits (LIHTC) by the bank.

Product Innovation and Flexibility - TDBNA's use of flexible loan products had a positive impact on its Lending Test performance. During the evaluation period, the bank originated 18 FHA loans totaling \$4.2 million in the New York-Wayne-White Plains MD.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Newark MD is not inconsistent with the excellent performance noted in the Multistate MSA (MMSA). Edison and Nassau-Suffolk had neutral levels of CD lending, so lending test results are weaker than the MMSA.

INVESTMENT TEST

Based on a full-scope review, performance in the New York-Wayne-White Plains MD is excellent. Performance in limited-scope AAs did not impact the Investment Test rating for the MMA. TDBNA's investment volume represents excellent responsiveness to the MSA's needs, particularly that of affordable housing.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA's investment volume is excellent. During the evaluation period, the bank made 639 investments in the MMA totaling \$229 million. Of the investments made prior to the current evaluation period, six remained outstanding as of year-end 2011 and had balances totaling \$4.2 million. These prior period investments add support for the assigned rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in all of the limited-scope areas is not inconsistent with the excellent performance noted in the MMSA.

SERVICE TEST

The bank's performance in the New York-Wayne-White Plains MD is good and performance in the limited-scope AAs did not impact the Service Test rating for the MMA.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services - The bank's branches are accessible to geographies and individuals of different income levels to all portions of the MD. The distribution of branches in both the LMI geographies is below the population residing in these geographies with the distributions poor and good, respectively. However, when giving consideration to branches in middle- and upper-income geographies that are in close proximity or "near to" LMI geographies,

accessibility significantly improves for LMI geographies and is considered good. TDBNA's record of opening and closing branch offices improved the accessibility of delivery systems in the AA. Five branches opened in moderate-income geographies. No offices were closed.

Community Development Services - TDBNA provided a good level of CD services to the New York-Wayne-White Plains MD, especially for necessary services aimed at LMI families. TDBNA provided a strong level of leadership in the MD through board and committee participation in various organizations that target the needs of the community. These identified needs include affordable housing as well as financial literacy, homeownership training for LMI families, and small business education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's Service Test performance in all limited-scope areas is weaker than the overall good performance in the MMSA because these areas have a weaker branch distribution.

Refer to Tables 1-15 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data that support all Test conclusions.

Philadelphia-Camden-Wilmington PA-NJ-DE Multistate Metropolitan Area

CRA rating for MMSA:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent borrower and adequate geographic loan distributions combined with excellent lending activity resulted in good performance in the full-scope area. CD lending had a neutral impact on the rating.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Good Service Test performance was demonstrated by the distribution of branches across the MMA. Adequate branch distribution in the MMA was elevated to the good level because we considered the additional access to banking services that are provided by branches located in middle- and upper-income geographies. Bank employees provided a good level of CD services.

Description of Institution's Operations in Philadelphia-Camden-Wilmington MMA

TDBNA's operations in the Philadelphia-Camden-Wilmington PA-NJ-DE MMA consist of three MDs: Philadelphia, Camden, and Wilmington (New Jersey and Delaware portion). As of June 30, 2010, bank deposits after adjusting for TD Ameritrade sweep deposits in the MMA totaled \$15.7 billion, representing 19% of the bank's deposits. In terms of deposit market share, TDBNA ranks fifth with a 5% share compared to 20% for ING Bank, the largest in the MMA. There are 150 FDIC insured depository institutions in the area, providing strong competition for the bank, however, the market is somewhat controlled by the four largest banks with a combined market share of 53%. Within this MMA, the bank operates 151 branches.

In evaluating the MMA, we conducted a full-scope review of the Philadelphia MD and limited-scope reviews for Camden, NJ MD and Wilmington DE-NJ, MD.

Refer to the market profile for the Philadelphia MD in Appendix C for detailed demographics and other performance context information.

LENDING TEST

We noted good lending performance in the full-scope Philadelphia MD. Lending performance in the limited-scope AAs did not have an impact on the Lending Test rating in the MMA.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is excellent, given strong competition. Although lending market shares for home purchase and home refinance are below its deposit share, TDBNA achieved high rankings and excellent loan volume for all mortgage products and small business lending. TDBNA ranks in the top 15 in all loan categories. In home improvement lending, TDBNA ranked fifth with a 6.16% market share. There are over 200 home improvement lenders in the market. There are over 400 lenders for home purchase, over 500 lenders for refinance loans, and over 100 small business lenders in the market. Many of these lenders are non-depository taking institutions, which skews the bank's lending market shares when compared to the bank's deposit market share. Within small business lending, American Express Bank dominated the market and ranked first with a market share of 37.5%.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is adequate and is supported by overall good distribution of home purchase loans and adequate distributions of home improvement, refinance, and small loans to businesses. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans to borrowers with different income levels is excellent. This is the result of excellent distributions of home purchase and small loans to businesses and good distribution of home improvement and refinances. We also took into consideration that 17% of the households in the AA are below the poverty level and an even higher level of poverty exists within the city of Philadelphia.

Community Development Lending - CD lending had a neutral impact on lending performance. TDBNA made 20 CD loans in the Philadelphia MD totaling nearly \$28 million. The current volume represents 3.3% of allocated Tier One Capital. Measured in dollars, 82% of these efforts provided CD services, 17% resulted in neighborhood revitalization or stabilization, and 1% provided affordable housing for LMI individuals.

Product Innovation and Flexibility - TDBNA's use of flexible loan products had a positive impact on its Lending Test performance. During the evaluation period, the bank originated 126 FHA loans totaling \$19 million in the Philadelphia MD.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the limited scope areas is not inconsistent with the good performance for the Lending Test in the MMSA.

INVESTMENT TEST

Based on a full-scope review, performance in the Philadelphia MD is excellent. TDBNA's investment volume represents excellent responsiveness to the MSA's needs, particularly that of affordable housing.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA's investment volume is excellent. During the evaluation period, the bank made 261 investments in the MD totaling \$91 million. Of the investments made prior to the current evaluation period, five remained outstanding as of year-end 2011 and had balances totaling \$3.9 million. These prior period investments add support for the assigned rating.

One example of the responsiveness of the investments is Connelly House. TDBNA made an equity investment of over \$12 million. Connelly House, an independent living facility in Philadelphia, provides subsidized affordable housing and case management services to 79 formerly homeless individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in all of the limited-scope areas is not inconsistent with the excellent performance noted in the MMSA.

SERVICE TEST

The bank's performance in the Philadelphia MD is good and performance in the limited-scope AAs did not impact the Service Test rating for the MMA.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services - Branch distribution is accessible to geographies and individuals of different incomes after also considering the impact of branches that are located in middle- or upper-income census tracts but accessible to LMI individuals or people living within adjacent LMI geographies. The bank's record of opening and closing branch offices improved the accessibility of delivery systems in the AA. One branch was opened in a moderate-income geography. The three branches that were closed were located in upper-income geographies.

Community Development Services - TDBNA provided a good level of CD services to the Philadelphia MD. TDBNA provided a strong level of leadership in the MD through board and committee participation in various organizations that target the needs of the community. These identified needs include financial literacy, homeownership training for LMI families, and small business education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's Service Test performance in the limited scope areas is not inconsistent with the overall good performance in the MMSA.

Refer to Tables 1-15 in the Philadelphia-Camden-Wilmington MMA section of Appendix D for the facts and data that support all Test conclusions.

BOSTON-CAMBRIDGE-QUINCY MULTISTATE METROPOLITAN AREA

CRA Rating for the MMSA: 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:

- CD lending had a significantly positive impact resulting in the Outstanding lending rating. There was excellent lending activity combined with good borrower distribution and good geographic distribution for all products.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Excellent Service Test performance was demonstrated by the distribution of branches across the Peabody MD. Bank employees provided a good level of CD services.

Description of Institution’s Operations in Boston-Cambridge-Quincy MMA

TDBNA has four AAs within the Boston-Cambridge-Quincy MA-NH MMA consisting of the following MDs: Peabody, Boston-Quincy, Cambridge, and Rockingham. As of June 30, 2010, the bank had \$6.5 billion of deposits in this geographic area. This is the bank’s third largest market for TDBNA and accounts for 7.9% of deposits. In terms of deposit market share, TDBNA ranks sixth in the MMA with a 3.8% share compared to 24.4% for Bank of America, the largest in the MMA. There are 144 FDIC insured depository institutions in the MMA, but the market is concentrated among the top three banks holding 51.4% of the area deposits. TDBNA operates 105 branches within the MMA.

In evaluating the MMA, we conducted a full-scope review of the Peabody MD. Refer to the market profile in Appendix C for performance context information.

LENDING TEST

Lending performance is excellent. Performance in limited-scope AAs did not have an impact on the Lending Test rating for the MMA.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is excellent. Although lending market shares for home purchase and home refinance are below its deposit share, TDBNA achieved high rankings and excellent loan volume for mortgage products and small business lending. TDBNA ranks in the top 15 in all loan categories. In home improvement lending, TDBNA ranked first with over a 10% market share. There are 120 home improvement lenders in the market. There are nearly 300 lenders for home purchase and nearly 400 lenders for refinance loans in the market. Many of these lenders are non-depository taking institutions, which skews the bank’s lending

market shares when compared to the bank's deposit market share. Although nationwide credit card lenders American Express, Chase, and Citigroup had a combined market share of 56% for small business lending, TDBNA ranked fourth with a 6.5% market share.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is good and is supported by excellent distribution of home purchase and home improvement loans, good distribution of refinances, and adequate distribution of small loans to businesses. In low-income geographies, less than 2% of owner-occupied housing is located in these geographies. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans to borrowers with different income levels is good for all products. We also took into account the high cost of home ownership in the AA as noted in the market profile in Appendix C when assigning the rating.

Community Development Lending - CD lending had a significantly positive impact on lending performance in the Peabody MD. Within the Peabody MD, TDBNA made 22 CD loans totaling \$60.3 million. Measured in dollars, 55% supported affordable housing developments, 11% funded CD services, and 34% supported economic development. One notable project included a \$24 million construction loan to acquire and convert two historic mills into 75 units of affordable housing in Lawrence.

Product Innovation and Flexibility - TDBNA's use of flexible loan products had a positive impact on its Lending Test performance. During the evaluation period, the bank originated 27 FHA loans totaling \$4.7 million and 16 Right Step loans totaling \$3.1 million in the Peabody MD.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Boston and Cambridge MD is not inconsistent with the excellent performance noted for the MMSA. Performance in Rockingham is weaker than the MMSA due to the neutral impact of CD lending within the MD.

INVESTMENT TEST

Based on a full-scope review, performance in the Peabody MD is excellent. TDBNA's investment volume represents excellent responsiveness to the AA's needs, particularly that of affordable housing.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA's investment volume is excellent. During the evaluation period, the bank made 93 investments in the MD totaling \$20.2 million. Of the investments made prior to the current evaluation period, five remained outstanding as of year-end 2011 and had balances totaling \$2.6 million. These prior period investments add support for the assigned rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in all of the limited-scope areas is not inconsistent with the excellent performance noted in the MMSA.

SERVICE TEST

Performance in the Peabody MD is good. Performance in the limited-scope AAs did not impact the Service Test rating for the MMA.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services - The bank's branches are accessible to geographies and individuals of different income levels. The percentage of the bank's branches located in low-income geographies is near to the percentage of the population. The percentage of the bank's branches in moderate-income geographies is near the percentage of the population. In the Peabody MD, three branches were closed in middle- and upper-income geographies.

Community Development Services - TDBNA provided a good level of CD services within the Peabody MD. CD services met a broad range of identified needs in the MD including housing education and social services for LMI families. Employees served on committees or boards for economic development, affordable housing, and community service organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the Cambridge and Rockingham MDs is stronger than the bank's good performance in the MMSA because of excellent branch distribution. The bank's performance in the Boston MD is not inconsistent with the performance in the MMSA.

Refer to Tables 1-15 in the Boston-Cambridge-Quincy MMA section of Appendix D for the facts and data that support all Test conclusions.

State of Connecticut Rating¹

CRA Rating for State:	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:

- CD lending had a significantly positive impact in determining the Outstanding Lending Test rating. The bank demonstrated good lending activity combined with good borrower and geographic distributions.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Good Service Test performance is the result of overall good retail services combined with a good level of CD services.

Description of Institution's Operations in the State of Connecticut

TDBNA has delineated five AAs within the state. They include the Hartford, New Haven, Bridgeport, and Norwich MSAs and Non-MSA Litchfield County. As of June 30, 2010, TDBNA held \$5.2 billion of deposits, which represented 6.3% of the bank's deposits. In terms of deposit market share, TDBNA ranks fifth with a 5.5% share compared to 22% share for Bank of America, the largest in the state. The bank operates 80 branches in the state.

In evaluating the state, we conducted a full-scope analysis of the Hartford MSA. Refer to the market profile for the State of Connecticut in Appendix C for performance context information.

LENDING TEST

Lending performance in the Hartford MSA is excellent. Performance in limited-scope AAs did not impact the Lending Test in the state of Connecticut. We did not analyze lending performance in the Norwich MSA due to the insufficient volume of loans to conduct a meaningful analysis.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is good. Loan rank is generally favorable to deposit rank and is good given the level of competition. There were 269 lenders for home purchase and 374 lenders for home refinance lending, with TDBNA ranked 26th and 19th, respectively. In home

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.

improvement lending, the bank ranked third behind Webster Bank and American Eagle Credit Union. TDBNA ranked eighth out of 71 small business lenders.

Distribution of Loans by Income Level of the Geography - The geographic distribution of loans is good, primarily because of good distribution of small business lending. We noted good distribution of the home improvement lending and adequate distribution of home purchase and refinances. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans to borrowers of different income levels is good. We noted good distributions for all mortgage and small business lending.

Community Development Lending - CD lending had a significantly positive impact on lending performance in the Hartford MSA. TDBNA made twelve CD loans totaling nearly \$21.6 million. The current volume represents nearly 9% of allocated Tier One Capital. Measured in dollars, 84% of these efforts provided affordable housing for LMI residents, 12% provided CD services, and 4% resulted in neighborhood revitalization or stabilization.

Product Innovation and Flexibility – TDBNA’s use of flexible loan products had a positive impact on its Lending Test performance. During the evaluation period, the bank originated 39 FHA loans totaling \$6.4 million in the Hartford MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the Bridgeport and New Haven MSAs and the non-metropolitan area is not inconsistent with the bank’s overall excellent performance under the Lending Test in the state of Connecticut.

INVESTMENT TEST

Based on a full-scope review, performance in the Hartford MSA is excellent. Performance in limited-scope AAs did not impact the Investment Test rating for the state of Connecticut. TDBNA’s investment volume represents excellent responsiveness to the area’s identified needs, particularly affordable housing and community services for LMI individuals.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA’s investment volume in the Hartford MSA is excellent. During the evaluation period, TDBNA made 102 investments in the MSA totaling \$32.5 million. Additionally, there were three prior period investments with remaining balances totaling \$6.3 million at year-end 2011.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in Bridgeport and New Haven is not inconsistent with the performance noted in the state rating. The Non MSA and Norwich are weaker than the performance noted in the state rating because of lower levels of investments. In addition to what is noted in the full- and limited-scope areas, TDBNA originated investments that benefited areas of Connecticut other than its specific AAs. In the current evaluation

period, it made eight investments totaling \$1.3 million. It also has two prior period investments of \$1.3 million. These investments further demonstrate TDBNA's commitment to CD investments throughout the state of Connecticut.

SERVICE TEST

The bank's performance in the Hartford MSA is good and performance in the limited-scope AAs did not impact the Service Test rating for the state of Connecticut.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services - The bank's branches are accessible to all geographies and individuals of different income levels in the MSA. The percentage of the bank's branches located in low-income geographies exceeds the percentage of the population residing there. The percentage of the bank's branches in moderate-income geographies is below the percentage of the population. TDBNA opened one branch and closed two branches in middle-income geographies.

Community Development Services - TDBNA provided a good level of CD services within the Hartford MSA. Bank employees were involved in community development programs targeted to LMI individuals, financial education, and small business seminars.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the New Haven-MSA is not inconsistent with the bank's good performance in the state of Connecticut. Performance in Bridgeport is stronger than the state rating due to excellent branch distribution. The bank's performance in the non-metropolitan area is weaker than the performance in the state because the branch distribution element is not as strong in moderate-income geographies. Performance in the Norwich MSA is considered adequate because there are no low- or moderate-income geographies in the AA.

Refer to Tables 1-15 in the state of Connecticut section of Appendix D for the facts and data that support all Test conclusions.

Commonwealth of Massachusetts Rating¹

CRA Rating for State:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- CD lending had significantly positive impact on the Outstanding Lending Test rating. The bank demonstrated good lending activity combined with good borrower and geographic distributions.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Excellent Service Test performance is the result of overall excellent retail services combined with a good level of CD services.

Description of Institution's Operations in the State of Massachusetts

TDBNA has delineated five AAs in the state. Four of these include MSAs and one includes only the Massachusetts side of the Providence-New Bedford-Falls River MMA. The bank holds \$3.8 billion in deposits in this area which represents 4.6% of the bank's deposits. Nearly 38% of the deposits are concentrated in the Springfield MSA, which was selected for full-scope analysis. The remaining four areas were analyzed using limited-scope procedures.

Refer to the market profile in Appendix C for performance context information.

LENDING TEST

Lending performance in the Springfield MSA is excellent. Performance in the limited-scope AAs did not impact the rating for the state of Massachusetts.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is good. We note good volumes with a significant level of competition. Home purchase and home refinance lending lags behind the other loan products in terms of market share and rank. Despite the level of competition (200 lenders in home purchase, 89 lenders in home improvement, 279 lenders in home refinance, and 89 small business lenders), TDBNA is producing a good level of lending activity.

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.

Distribution of Loans by Income Level of the Geography - The geographic distribution of loans is good. We noted good distribution among all home mortgage products and small business lending. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of borrower is good. We noted a good distribution for all mortgage products and small business loans. The distribution of mortgage loans is particularly noteworthy, given that nearly 13% of households in the MSA have incomes below the poverty level.

Community Development Lending - CD lending had a significantly positive impact on the bank's lending performance. TDBNA originated 17 CD loans totaling \$16.9 million. Measured in dollars, 52% were for affordable housing to LMI, 30% were for community services, and 18% for economic development and stabilization/revitalization of LMI geographies.

Product Innovation and Flexibility - TDBNA's use of flexible loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated 35 FHA loans totaling \$5 million and two Right Step loans for \$214 thousand.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance is not inconsistent with the overall excellent performance in the state of Massachusetts for Barnstable, Pittsfield and Worcester limited-scope AAs. Performance in Providence was weaker than the state Of Massachusetts because the area had good borrower distribution and lower volume of CD loans.

INVESTMENT TEST

Based on a full-scope review, performance in the Springfield MSA is excellent. Performance in limited-scope AAs had no impact on the Investment Test rating for the state of Massachusetts. TDBNA's investment volume represents excellent responsiveness to the area's needs, particularly that of affordable housing.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA's investment volume in the Springfield MSA is excellent. During the evaluation period, the bank made 94 investments in the MSA totaling \$13.4 million. At year-end 2011, two prior period investments totaling \$969 thousand remained outstanding.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in all of the limited-scope areas is not inconsistent with the performance noted in the state of Massachusetts.

In addition to investments in the full- and limited-scope areas, TDBNA originated investments that benefited areas of Massachusetts other than its specific AAs. In the current evaluation period, the bank made ten such investments totaling \$18.2 million. It also has nine prior period investments of \$8 million.

SERVICE TEST

Performance in the Springfield MSA is excellent. Performance in the limited-scope AAs did not impact the Service Test rating for Massachusetts.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services - The bank's branches are readily accessible to geographies and individuals of different incomes. In low-income geographies, the percentage of branches is near to the percentage of the population residing there. In moderate-income geographies, the percentage of branches exceeds the percentage of the population. TDBNA closed one branch in the MSA in a middle-income geography.

Community Development Services - TDBNA provided a good level of CD services within the Springfield MSA. Bank employees were involved in community development programs targeted to LMI individuals, financial education, and small business seminars.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Service Test performance in Barnstable, Pittsfield, and Worcester was not inconsistent with the bank's excellent performance in the state of Massachusetts. Performance in Providence was weaker than the state of Maine rating because of the bank's limited presence.

Refer to Tables 1-15 in the state of Massachusetts section of Appendix D for the facts and data that support all Test conclusions

State of Maine Rating¹

CRA Rating for State:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending activity and geographic distribution combined with good borrower distribution resulted in the Outstanding Lending Test rating. CD lending also had a significantly positive impact on the rating.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Excellent Service Test performance is the result of overall excellent retail services combined with a good level of CD services.

Description of Institution’s Operations in the State of Maine

TDBNA has delineated four AAs within the state. They include three in MSAs and one in a non–metropolitan area. Statewide, the bank holds \$3.2 billion in deposits and represents 3.9% of the bank’s deposits. Over half of the deposits are concentrated in the Portland MSA, which was selected for the full-scope analysis. The remaining MSAs and non-metropolitan area were analyzed using limited-scope procedures.

Refer to the market profile for the Portland MSA in Appendix C for performance context information.

LENDING TEST

Lending performance in the Portland MSA is excellent. Performance in limited-scope AAs did not impact the Lending Test rating for Maine.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is excellent. TDBNA has a strong presence in the area for deposits. TDBNA’s market share for both home improvement loans and small business lending equaled its deposit market share and ranked second for both products. Although lending market share for home purchase and home refinance loans is below its deposit market share, TDBNA achieved high market rank given the strong competition in the MSA. There are 193 home purchase lenders and 275 home refinance lenders in the AA.

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.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is excellent. We noted an excellent distribution of small business loans along with excellent distribution for home improvement and refinance loans. There are limited opportunities to lend in LMI geographies for home mortgage products, but the bank outpaced the demographics and achieved excellent market share. Distribution of home purchase loans is good. We did not identify any geographic gaps in lending. Greater weight was placed on performance in the moderate-income geographies, due to the low percentage of owner-occupied housing in low-income geographies.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of borrower is good. We noted a good distribution of small business loans, good distribution of home purchase and refinance loans, and excellent distribution of home improvement loans.

Community Development Lending - CD lending had a significantly positive impact on lending performance in the Portland MSA. The bank originated 14 CD loans totaling approximately \$28.4 million during this evaluation period. This volume represents 18% of allocated Tier One Capital. Measured in dollars, 80% supported affordable housing developments and 30% funded CD services for LMI individuals. The loans are responsive to the AA needs of affordable housing. Construction of 174 new units in five different projects is being funded through \$20.8 million in loans.

Product Innovation and Flexibility - TDBNA's use of flexible loan programs had a positive impact on the Lending Test performance. During the evaluation period, the bank originated 70 FHA loans totaling \$11 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in all limited scope areas is not inconsistent with the bank's overall excellent performance in the state of Maine.

INVESTMENT TEST

Based on a full-scope review, performance in the Portland MSA is excellent. Performance in limited-scope AAs did not impact the Investment Test rating for the state of Maine. TDBNA's investment volume represents excellent responsiveness to the area's identified needs, particularly affordable housing and community services for LMI individuals.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA's investment volume is excellent. The bank made a wide range of investments including LIHTCs, MBS, state of Maine housing bonds, and grants. During the evaluation period, TDBNA originated 87 investments in the Portland AA totaling approximately \$19.6 million. The remaining balance on six prior period investments as of year-end 2011 was \$6 million. One example that demonstrates the bank's responsiveness is the bank's funding of \$3 million in LIHTCs used for the construction of affordable housing for 40 LMI families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the three limited-scope AAs is not inconsistent with the excellent performance noted in the State of Maine.

In addition to investments in the full- and limited-scope areas, TDBNA originated investments that benefited areas of Maine other than its specific AAs. In the current evaluation period, the bank made ten such investments totaling \$2.1 million. It also has four prior period investments of \$4.8 million

SERVICE TEST

Performance in the Portland MSA is excellent. Performance in the limited-scope AAs did not impact the Service Test rating for Maine.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services - The bank's branches are readily accessible to geographies and individuals of different income levels. In low-income geographies, the percentage of branches exceeds the percentage of the population residing there. In moderate-income geographies, the percentage of branches is near to the percentage of the population. TDBNA did not close any branches and opened two branches in middle-income geographies.

Community Development Services - TDBNA provided a good level of CD services to the Portland MSA. Numerous employees provided a range of CD services within the MSA, focusing on financial education directed to LMI people and small businesses. Many employees serve on committees or in leadership positions with CD organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Service Test performance in the three limited-scope AAs was not inconsistent with the bank's excellent performance in the state of Maine.

Refer to Tables 1-15 in the state of Maine section of Appendix D for the facts and data that support all Test conclusions

Allentown-Bethlehem-Easton PA-NJ MMA Rating

CRA Rating for the MMA:	High Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Good geographic distribution and excellent borrower distribution combined with adequate lending activity and a positive impact from CD lending resulted in a High Satisfactory lending rating.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Adequate Service Test performance is the result of overall adequate retail services combined with a good level of CD services. Poor branch distribution in the MMA was elevated to the adequate level because we considered the additional access to banking services that are provided by branches in middle- and upper-income geographies that are in close proximity of LMI geographies.

Description of Institution's Operations in the Allentown-Bethlehem-Easton MMA

The TDBNA AA consists of all counties in the MMA except for Carbon County in Pennsylvania. As of June 30, 2010, the bank had \$384 million in deposits in the geographic area, representing less than 1% of the bank's deposits. Performance within the MMA had minimal impact on the bank's overall CRA rating. TDBNA operates seven branches in the MMA. PNC, National Penn, and Wells Fargo, each with larger branch networks, dominate the area with market shares of 10.5%, 11.6%, and 26.9%, respectively.

LENDING TEST

Lending performance in the Allentown-Bethlehem-Easton MMA is good.

Lending Activity - Lending activity is adequate, given the limited presence in the AA and strong competition. We noted a modest level of lending among all products. Lending market share for home purchase, refinance, and small business was well below the bank's deposit market share. The lending market share and rank for home improvement lending was more in line with the deposit market share, but was still below the deposit market share.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is good. This is the result of an excellent distribution of home refinance loans, good distribution of home improvement loans, and adequate distribution of home purchase and small business loans. The distribution of mortgage loans is also considered good considering that only 1.3% of owner-occupied housing units are located in

low-income geographies and strong competition. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of borrower within the MMA is excellent. This is the result of an excellent distribution of home purchase and small business loans combined with an adequate distribution of home improvement and refinance loans.

Community Development Lending - CD lending had a positive impact on lending performance in the MMA. TDBNA made three CD loans totaling \$1.6 million.

Product Innovation and Flexibility - TDBNA's use of flexible or innovative loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated five FHA loans totaling \$747 thousand.

INVESTMENT TEST

TDBNA's investment volume is excellent. During the evaluation period, TDBNA made 52 investments in the MMA totaling \$7.1 million. The bank invested \$2.3 million in a Small Business Investment Company that will help preserve jobs and expand e-commerce for a small business located in Allentown, Pennsylvania.

SERVICE TEST

The bank's performance in the Allentown-Bethlehem-Easton MMA is adequate.

Retail Banking Services - TDBNA's seven branches are reasonably accessible to geographies and individuals of different income levels after giving consideration of branches located in middle- and upper-income geographies that are in close proximity to LMI geographies. None of the bank's branches are located in low- or moderate-income geographies.

Community Development Services - TDBNA provided a good level of CD services to the Allentown-Bethlehem-Easton. TDBNA provided a strong level of leadership in the MMA through board and committee participation in various organizations that target the needs of the community. These identified needs include financial literacy, homeownership training for LMI families, and small business education.

Washington-Arlington-Alexandria MMSA Rating

CRA Rating for the MMSA:	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:

- Good lending activity combined with excellent borrower and good geographic distributions resulted in the Outstanding Lending Test Rating. CD lending had a significantly positive impact on the rating.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Good Service Test performance is the result of overall good retail services combined with a good level of CD services.

Description of Institution's Operations in the Washington-Arlington-Alexandria MMA

TDBNA has defined two AAs within the Washington-Arlington-Alexandria MMA. The first, the Washington-Arlington-Alexandria MD consists of the District of Columbia, Prince George's County (Maryland), and several political subdivisions within Northern Virginia. The second area consists of the Bethesda-Rockville-Frederick MSA with the exception of Frederick County in Maryland. TDBNA has \$1.4 billion of deposits in this geographic area, representing 1.8% of the bank's deposits. Nearly 86% of the deposits are from the Washington-Arlington-Alexandria MSA, which was selected for a full-scope analysis. The bank operates 33 branches in the MMA.

LENDING TEST

Lending performance in the Washington-Arlington-Alexandria MD is excellent. Performance in the limited-scope AA did not impact the Lending Test rating for the MMA.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is good, given the very strong competition among lenders in the AA. Lending market share in all categories are generally below the deposit market share. This AA has over 400 home purchase lenders, nearly 200 home improvement lenders, and nearly 600 home refinance lenders. There are also over 100 small business lenders. American Express Bank dominated the small business lending with nearly a 41% market share. We noted a good volume of loan originations.

Distribution of Loans by Income Level of the Geography – Geographic distribution is good. The geographic distribution of mortgage loans is excellent and the geographic distribution for

loans to small business is adequate. We noted an excellent distribution of all home mortgage products, coupled with adequate distribution of small business loans. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The overall distribution of loans to borrowers of different income levels is excellent. This is supported by excellent distributions for all loan categories except home improvement loans, which is good. The distribution of mortgage loans is noteworthy given that 7.5% of total households have incomes below the poverty level and the high cost of housing in this area. Based on the NAR's fourth quarter 2010 report, the median sales price in the Washington metropolitan area was \$325 thousand.

Community Development Lending - CD lending had a significantly positive impact on lending performance in the MMA. TDBNA made six CD loans totaling \$12.2 million. The loans were responsive to the identified needs of the AA. Nearly all of the dollars targeted affordable housing for LMI individuals.

Product Innovation and Flexibility - TDBNA's use of flexible or innovative loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated twelve FHA loans totaling \$2.7 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, the bank's performance under the Lending Test in the Bethesda MSA is not inconsistent with the bank's overall excellent performance in the MMSA.

INVESTMENT TEST

Based on a full-scope review, performance in the Washington-Arlington-Alexandria MD is excellent. Performance in the limited-scope AA had no impact on the Investment Test rating for the MMA. TDBNA's investment volume represents excellent responsiveness to the area's needs, particularly that of affordable housing.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA's investment volume is excellent. During the evaluation period, TDBNA made 129 investments in the MD totaling almost \$23 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, the bank's performance under the Investment Test in the Bethesda MSA is not inconsistent with the bank's overall excellent performance in the MMSA.

SERVICE TEST

Performance in the Washington-Arlington-Alexandria MD is good. Performance in the limited-scope AA did not impact the Service Test rating for the MMA.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services - The bank's branches are accessible to geographies and individuals of different income levels. The percentage of the bank's branches located in low-income geographies significantly exceeds the percentage of the MD population living in those geographies. The percentage of the bank's branches in moderate-income census tracts is below the population living there. TDBNA's record of opening and closing branch offices improved the accessibility of delivery systems in the AA. During the evaluation period, eleven branches opened with four located in low-income geographies and one in a moderate-income geography. The remaining branches opened were in middle- and upper-income geographies. No branches were closed.

Community Development Services - TDBNA provided a good level of CD services to the Washington-Arlington-Alexandria MD. TDBNA provided a strong level of leadership in the MD through board and committee participation in various organizations that target the needs of the community. These identified needs include financial literacy, homeownership training for LMI families, and small business education.

Conclusions for Areas Receiving Limited-Scope Reviews

The bank's Service Test performance in the Bethesda MSA is not inconsistent with the bank's good performance in the MMSA.

Refer to Tables 1-15 in the Washington-Arlington-Alexandria section of Appendix D for the facts and data that support all Test conclusions.

State of Delaware Rating

CRA Rating for State:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Good borrower and geographic distributions combined with adequate lending activity resulted in the High Satisfactory Lending Test rating. CD lending also had a significantly positive impact on the rating.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Adequate Service Test performance is the result of overall good retail services combined with a good level of CD services. Poor branch distribution in the state was elevated to the adequate level because we considered the close proximity of the branches to moderate-income geographies.

Description of Institution's Operations in the State of Delaware

The bank's single AA for the state of Delaware consists of the Dover MSA (Kent County) in its entirety. The bank's performance within New Castle County is included in the Wilmington MD within the Philadelphia-Camden-Wilmington MMSA. Within the Dover MSA, the bank operates two branches with deposits totaling \$44 million, or 0.05% of the bank's total deposits and, as a result, had a minimal impact on the bank's overall CRA rating. There are no low-income census tracts within the Dover MSA. In performing our Lending Test analysis, we reviewed only home purchase and home refinance loans. The volume of home improvement and small loans to businesses was insufficient to draw meaningful conclusions.

LENDING TEST

Lending performance in the Dover MSA is good.

Lending Activity - The bank's level of lending is adequate, given the limited volume of deposits in the state. During the evaluation period, TDBNA originated 88 home mortgage loans totaling nearly \$13 million and 15 small loans to businesses for \$2.2 million.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is good. This is supported by an excellent distribution of refinance loans and poor distribution of home purchase loans.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of borrower within the MSA is good. This is supported by good distributions of home purchase and refinances.

Community Development Lending - CD lending had a significantly positive impact on lending performance in the Dover AA. The bank originated one CD loan totaling \$500 thousand during this evaluation period which represents 13% of allocated Tier One capital. The loan provided permanent financing in support of 76 affordable housing units for LMI families.

Product Innovation and Flexibility - TDBNA's use of flexible or innovative loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated one FHA loan totaling \$230 thousand.

INVESTMENT TEST

Based on a full-scope review, performance in the Dover MSA is excellent. TDBNA's investment volume represents excellent responsiveness to the MSA's needs, particularly that of affordable housing.

During the evaluation period, TDBNA made 16 investments in the MSA totaling \$687 thousand. The year-end 2010 balance of 22 prior period investments was approximately \$1.5 million. These prior period investments add support for the assigned rating.

SERVICE TEST

Retail Banking Services - Branches are reasonably accessible to geographies and individual of different incomes given that this AA has only two branches, both in upper-income geographies. The AA has no low-income geographies and only 9% of the population resides in moderate-income geographies. No branches were opened or closed.

Community Development Services - TDBNA provided a good level of CD services to the Dover MSA. TDBNA provided a good level of leadership in the MSA through board and committee participation in various organizations that target the identified needs of the community. These needs include financial literacy, homeownership training for LMI families, and small business education.

State of Florida Rating

CRA Rating for State:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Good lending activity combined with excellent borrower and geographic distributions resulted in the Outstanding Lending Test rating.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Excellent Service Test performance is the result of overall excellent retail services combined with a good level of CD services.

Description of Institution's Operations in the State of Florida

TDBNA has three AAs within the state that were included in this evaluation. They include the West Palm Beach MD, Fort Lauderdale MD, and the Miami MD. As of June 30, 2010, the bank had \$1.6 billion of deposits in this geographic area. In terms of deposit market share, TDBNA ranks 17th with 1% compared to Bank of America (14.7%) and Wells Fargo (17.5%), each with much larger branch networks. TDBNA operates 47 branches in the area. Over 53% of TDBNA deposits are in the West Palm Beach MD, which was selected for a full-scope analysis. In late 2010, TDBNA acquired two financial institutions, which significantly expanded the bank's operations in Florida and added several new AAs. Given the timing of these acquisitions during the evaluation period, these added areas were not analyzed in determining the state rating.

LENDING TEST

Lending performance in the West Palm Beach MD is excellent. Performance for the limited-scope AAs did not impact the rating for Florida.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is good, given the strong competition in the AA. Although market share for all loan products is below the bank's deposit market share, TDBNA originated a good volume of home purchase and refinance loans coupled with small business loans. Lending market share is also skewed by the significant number of lenders in the market. For both home purchase and home refinance, there are nearly 400 lenders in the AA. We did not analyze home improvement loans in evaluating this element of the lending performance criteria because of the limited number of loans originated. In addition, in the limited-scope AAs, we did not analyze home refinance lending because of the limited number of loans originated.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is excellent. We noted excellent distributions of home purchase and small business loans and adequate distribution of home refinance loans. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of borrower is excellent. We noted an excellent distribution of small business and home purchase loans and adequate distribution of home refinance loans. The excellent distribution is further supported given the high cost of housing and 9% poverty level in the AA.

Community Development Lending - CD lending had a neutral impact on lending performance in the West Palm Beach MD. The bank originated two CD loans totaling \$482 thousand during this evaluation period.

Product Innovation and Flexibility - TDBNA's use of flexible or innovative loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated ten FHA loans totaling \$1.1 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, the bank's performance under the Lending Test in the Fort Lauderdale and Miami MDs is not inconsistent with the bank's overall excellent performance in the state.

INVESTMENT TEST

Based on a full-scope review, performance in the West Palm Beach MD is excellent. Performance in the limited-scope AA had no impact on the Investment Test rating for the state. TDBNA's investment volume represents excellent responsiveness to the area's needs, particularly that of affordable housing.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA's investment volume in the West Palm Beach MD is excellent. During the evaluation period, TDBNA made 49 investments in the MSA totaling \$11.1. The year-end 2011 balance of one prior period investment was \$500 thousand.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in all of the limited-scope areas is not inconsistent with the excellent performance noted in the state.

In addition to investments in the full- and limited-scope areas, TDBNA originated investments that benefited areas of Florida other than its specific AAs. In the current evaluation period, the bank made seven such investments totaling \$601 thousand. It also has one prior period investment of \$10 thousand. These investments further demonstrate TDBNA's commitment throughout the state.

SERVICE TEST

Performance in the West Palm MD is excellent. Performance in limited-scope AAs did not impact the Service Test rating for Florida.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Delivery Systems - The bank's branches are readily accessible to geographies and individual of different incomes for the West Palm MD. The percentage of branches in low-income geographies exceeds the percentage of the population living there. In moderate-income geographies, the percentage of branches is below the percentage of the population residing there. TDBNA opened five branches; one in a moderate-income geography and four in upper-income geographies. One branch in an upper-income geography was closed.

Community Development Services - TDBNA provided a good level of CD services to the West Palm Beach MD. TDBNA provided a strong level of leadership in the MD through board and committee participation in various organizations that target the needs of the community. These identified needs include financial literacy, homeownership training for LMI families, and small business education.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in both limited-scope MDs is weaker than the overall excellent performance in the state and is considered good. The weaker performance is due to branch distribution.

Refer to Tables 1-15 in the Florida section of Appendix D for the facts and data that support all Test conclusions.

State of Maryland Rating

CRA Rating for State:	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:

- Excellent lending activity combined with excellent borrower and good geographic distributions resulted in the Outstanding Lending Test rating. CD lending had a neutral impact on the rating.
- Excellent responsiveness to the AA's investment needs through the volume of qualified investments originated during the evaluation period.
- Adequate Service Test performance is the result of adequate retail services combined with a good level of CD services. Poor branch distribution in the AA was elevated to the adequate level because we considered the access to banking services that are provided by branches located in middle- and upper- income geographies and within a reasonable distance, 0.5 miles, from LMI geographies.

Description of Institution's Operations in the State of Maryland

TDBNA's single AA includes four of the seven political subdivisions of the Baltimore-Towson MSA. The area includes Anne Arundel, Baltimore and Harford counties and Baltimore City. The bank's operations in other parts of Maryland are included in the Washington-Arlington-Alexandria MMSA as required by the CRA. As of June 30, 2010, TDBNA had \$158 million of deposits in this area and represents 0.19% of the bank's deposits and, as a result, had minimal impact on the bank's overall CRA rating.

LENDING TEST

Lending Activity - Lending activity is excellent given the bank's limited presence and strong competition in the AA. Market share for home mortgage lending equals the bank's deposit market share. For home purchase and home improvement, the bank's market share exceeded deposit market share. This is a very competitive market with 345 home purchase and 145 home improvement lenders. For small business lending, although the bank's market share lagged the deposit market share, there are 91 small business lenders with several credit card banks dominating the market.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is good. We noted excellent distributions of home improvement and home refinance lending and adequate distributions of home purchase and small loans to businesses. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of borrower is excellent. We noted excellent distributions of all loan products,

with the exception of home Improvement loans, which was adequate. The excellent distribution is further supported given the high cost of housing and 11% poverty level in the AA.

Community Development Lending - CD lending had a neutral impact on lending performance in the Baltimore MSA. The bank originated one CD loan for \$250 thousand during this evaluation period.

Product Innovation and Flexibility - TDBNA's use of flexible or innovative loan programs had a neutral impact on its Lending Test performance. During the evaluation period, the bank originated two FHA loans totaling \$439 thousand.

INVESTMENT TEST

Based on a full-scope review, performance in the Baltimore MSA is excellent. TDBNA's investment volume represents excellent responsiveness to the MSA's needs. During the evaluation period, TDBNA made 18 investments in the MSA totaling \$3.4 million. The year-end 2010 balance of one prior period investment was approximately \$2.7 million. This prior period investment adds support for the assigned rating.

SERVICE TEST

Based on a full scope review, performance is adequate.

Retail Delivery Systems - The bank's branches are reasonably accessible to geographies and individuals of different incomes. TDBNA does not have any branches in the low- or moderate-income geographies of the MSA, however, it has only five branches within the MSA, four of which were opened during the assessment period. The majority of the population, 65%, is located in middle- and upper-income geographies. The bank opened four branches and did not close any branches during the evaluation period.

Community Development Services - TDBNA provided a good level of CD services to the Baltimore MSA given the bank's limited presence in this MSA.

State of New Hampshire Rating

CRA Rating for State:	Outstanding
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance in the full-scope Manchester MSA was negatively impacted by only adequate lending performance in the limited-scope non-MSA. Within the Manchester AA lending activity and geographic distribution was excellent and borrower distribution is good. CD lending had a significantly positive impact on the full scope rating.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Excellent service test performance is the result of overall excellent retail services combined with a good level of CD services.

Description of Institution's Operations in the State of New Hampshire

TDBNA has two AAs within the state. They are the Manchester MSA and six of seven counties (excludes Coos) within the non-MSA area of the state. Statewide, the bank has \$3.3 billion of deposits, which represents almost 4% of the bank's total deposits. Deposits within the Rockingham MD are included in the analysis of the Boston-Cambridge-Quincy MMSA. Within New Hampshire, 45% of the deposits and 24 of the bank's 50 branches are concentrated in the Manchester MSA, which received a full-scope review. The non-MSA limited-scope area contained 55% of the deposits and, therefore, influenced the state rating and lending test rating.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is excellent. Although lending market shares are generally below its deposit share, TDBNA achieved high rankings and excellent loan volumes for mortgage categories and small business lending despite strong competition. TDBNA attained a 1st place rank for home improvement lending with a 24.5% market share and third place rank for small business lending with an 11.4% market share. American Express Bank dominated the small business lending market with a 30% market share. There are 189 lenders for home purchase and 255 lenders for home refinance loan in the market.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is excellent. We noted excellent distribution of home

purchase, good distribution of home improvement and refinance, and excellent distribution for small business loans. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of borrower is good. We noted excellent distributions of home purchase and home improvement loans and good distribution of home refinance and small business loans.

Community Development Lending - CD lending had a significantly positive impact on lending performance in the Manchester MSA. The bank originated ten CD loans totaling \$174 million during this evaluation period. By dollars, approximately 98% helped create or preserve affordable housing for LMI persons.

Product Innovation and Flexibility - TDBNA's use of flexible or innovative loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated 21 FHA loans totaling \$3.4 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, the bank's performance under the Lending Test in the non-MSA AA is weaker than the overall good performance in the state of New Hampshire, but performance is considered adequate. CD lending had a positive impact. The weaker performance was primarily the result of poorer geographic distribution of loans.

INVESTMENT TEST

Performance in the Manchester MSA is excellent. Performance in the limited-scope AA had no impact on the Investment Test rating for New Hampshire.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA's investment volume in the Manchester MSA is excellent. During the evaluation period, the bank made 93 investments in the MSA totaling \$15 million, or nearly 11% of allocated Tier One Capital. As of year-end 2011, one prior period investment totaling \$34 thousand remained outstanding.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Investment Test performance in the non-MSA AA is not inconsistent with that noted in the state.

In addition to investments in the full- and limited-scope areas, TDBNA originated ten investments totaling \$2.5 million that benefited areas of New Hampshire other than its specific AAs within the state. The bank has three prior period investments with a book value of \$3.4 million.

SERVICE TEST

Performance in the Manchester MSA is excellent. Performance in the limited-scope AA had no impact on the Service Test in New Hampshire.

Conclusions for Areas Receiving Full-Scope Reviews

Retail Delivery Systems - TDBNA's delivery systems are readily accessible to geographies and individuals of different income levels in the full-scope AA. The distribution of TDBNA's offices in moderate-income geographies exceeds the distribution of the population living in such geographies. Although there are no branches in low-income geographies, a small percentage (less than three percent) of the population lives in these geographies. Two Main Street branches in Nashua and the Franklin Street branch in Manchester are each less than a quarter-mile from the adjacent low-income geography. There were no branch openings or closings during the evaluation period.

Community Development Services - TDBNA provided a good level of CD services to the Manchester MSA. TDBNA provided a strong level of leadership in the MD through board and committee participation in various organizations that target the needs of the community. These identified needs include financial literacy, homeownership training for LMI families, and small business education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Service Test performance in the non-metropolitan AA is not inconsistent with the performance in the state of New Hampshire due to excellent branch distribution in moderate-income geographies.

Refer to Tables 1-15 in the New Hampshire section of Appendix D for the facts and data that support all Test conclusions.

State of New Jersey Rating

CRA Rating for State:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity and borrower distribution combined with adequate geographic distribution resulted in the High Satisfactory Lending Test rating. CD lending had a neutral impact on the rating.
- Excellent Investment Test performance as demonstrated by responsiveness to the AA's investment needs through the volume of qualified investments originated during the evaluation period.
- Good Service Test performance is the result of overall good retail services combined with a good level of CD services.

Description of Institution's Operations in the State of New Jersey

TDBNA has four AAs within the state. They include the Atlantic City, Ocean City, Trenton, and Vineland MSAs. The bank's operations within other parts of New Jersey are included in the evaluation of the New York-Northern New Jersey-Long Island MMSA as required by the CRA. Statewide, the bank held \$2.4 billion of deposits, which represents 2.9% of the bank's total deposits. Within New Jersey, 39% of the deposits are concentrated in the Atlantic City MSA, which was selected for the full-scope review. The remaining MSAs were analyzed using limited-scope procedures. The limited-scope areas contained 61% of the bank's deposits in the state and, therefore, influenced the ratings in the state.

LENDING TEST

Lending performance in the Atlantic City MSA is good. Performance in limited-scope AAs did not impact the Lending Test rating for New Jersey.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is excellent, given strong competition. Although lending market shares are below its deposit share, TDBNA achieved high rankings and excellent loan volume for all mortgage products and small business lending. TDBNA ranks in the top 10 in all loan categories. In home improvement lending, TDBNA ranked first with a 17.6% market share. There are 163 lenders for home purchase and 249 lenders for home refinance loans. Many of these lenders are non-depository taking institutions, which skews the bank's lending market shares when compared to the bank's deposit market share. Within small business lending, American Express Bank dominated the market and ranked first with a market share of 33%.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is adequate. We noted excellent distribution of home purchase, good distribution of home refinance, adequate distribution of small business loans, and poor distribution of home improvement loans. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of borrower is excellent. We noted excellent distributions of home purchase, home improvement, and small business loans and good distribution of home refinance loans.

Community Development Lending - No CD loans were originated during the evaluation period. This had a neutral impact on the Lending Test rating in the state.

Product Innovation and Flexibility - TDBNA's use of flexible or innovative loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated 5 FHA loans totaling \$729 thousand in the Atlantic City MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, performance in the Trenton and Vineland MSAs is stronger than the overall good performance in the state. The stronger performance is attributed to CD lending that had positive impact on the Lending Test. Performance in Ocean City is weaker than the overall good performance, but is considered adequate. The weaker performance is attributed to weaker geographic distribution of lending.

INVESTMENT TEST

TDBNA's overall performance in the Atlantic City MSA is excellent. Performance in the limited-scope AA had no impact on the Investment Test rating for New Jersey. TDNA's investment volume represents excellent responsiveness to the MSA.

Conclusions for Areas Receiving Full-Scope Reviews

TDBNA's investment volume in the Atlantic City MSA is excellent. During the evaluation period, the bank made 40 investments in the MSA totaling nearly \$11.5 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Trenton-Ewing and Vineland MSAs is not inconsistent with the overall excellent performance in New Jersey. Performance in the Ocean City MSA is weaker than the excellent performance, but still considered good.

In addition to investments in the full- and limited-scope areas, TDBNA originated investments that benefited areas of New Jersey other than its specific AAs. TDBNA made 13 investments totaling \$7.1 million. It also has three prior period investments with remaining balances totaling \$4.6 million. These investments further demonstrate TDBNA's commitment to a wide array of community development needs within the state.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Delivery Systems - TDBNA's delivery systems are accessible to geographies and individuals of different income levels in the Atlantic City MSA. The distribution of TDBNA's offices in low-income geographies exceeds the distribution of the population living in such geographies. Although there are no branches in moderate-income geographies, seven branches in middle- and upper-income geographies are in close proximity to moderate-income geographies. There were no branch openings or closings during the evaluation period.

Community Development Services - TDBNA provided a good level of CD services to the Atlantic City MSA. TDBNA provided a good level of leadership in the MSA through board and committee participation in various organizations that target the identified needs of the community. These needs include financial literacy, homeownership training for LMI families, and small business education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, performance in the Trenton and Vineland MSAs is not inconsistent with the good performance in the state of New Jersey. Performance in the Ocean City MSA is stronger than the overall performance and is due to better branch distribution throughout the MSA.

Refer to Tables 1-15 in the New Jersey section of Appendix D for the facts and data that support all Test conclusions.

State of New York Rating

CRA Rating for State:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- CD lending significantly positively impacted the Lending Test rating resulting in an Outstanding rating. There is good lending activity and good geographic and borrower distribution.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Excellent Service Test performance is the result of excellent retail services combined with a good level of CD services.

Description of Institution's Operations in the State of New York

TDBNA has seven AAs within the state. Four are located in MSAs and three are in non-metropolitan areas. The bank's operations within the metropolitan NYC area are included in the evaluation of the New York-Northern New Jersey-Long Island MMSA as required under the CRA. Statewide, the bank held \$2.2 billion of deposits, which represents 2.7% of the bank's total deposits. Within New York, 37% of the deposits are concentrated in the Poughkeepsie MSA, which was selected for the full-scope review. The remaining MSAs and combined non-metropolitan areas were analyzed using limited-scope procedures. The limited-scope areas contained 63% of the bank's deposits in the state and, therefore, influenced the ratings in the state.

LENDING TEST

Lending performance in the Poughkeepsie MSA is excellent. Performance in limited-scope AAs did not impact the Lending Test rating for New York.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity in the Poughkeepsie MSA is considered good, primarily because of strong competition. Even though the bank's lending market share is significantly below its deposit market share, the bank's rankings for the loan products were generally high after considering the large number of lenders active in this market. In overall home mortgage lending, TDBNA ranked 12th with a 1.2% market share. This is a highly competitive market with a large number of lenders. Nationwide credit card lenders including American Express, Chase, and Citigroup dominated the market with a combined market share of 59%. This greatly contributed to the minimal market share percentages for locally based lenders.

Distribution of Loans by Income Level of the Geography - The geographic distribution of loans is good. This is supported by excellent distribution of home purchase loans, good distribution of home improvement and small loans to businesses, and adequate distribution of home refinance loans.

Distribution of Loans by Income Level of the Borrower - The distribution of loans to borrowers of different income levels and businesses of different sizes is good. The distribution of home improvement loans is excellent, and the distribution of home purchase, home refinance, and small loans to businesses is good.

Community Development Lending - CD lending had a significantly positive impact on lending performance in the MSA. TDBNA originated five CD loans for approximately \$21.9 million which represents 29% of allocated Tier One capital. The bank provided \$8.8 million in construction loans which will provide for 88 units of affordable housing for LMI families in the AA.

Product Innovation and Flexibility - TDBNA's use of flexible or innovative loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated seven FHA loans totaling \$1.2 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the Albany and non-MSA is not inconsistent with the excellent performance in the state. The bank's performance in the Glen Falls AA is weaker, but still good. The volume of CD loans in the Glen Falls area had a neutral impact on lending performance. There was insufficient volume of lending in the Kingston AA to conduct an analysis.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, performance in the Poughkeepsie MSA is excellent. Performance in limited-scope AAs had no impact on the Investment Test rating for New York. TDBNA's investment volume represents excellent responsiveness to the area's needs, particularly that of affordable housing.

Most of the bank's investments are concentrated in LIHTCs. During the evaluation period, TDBNA originated 52 investments totaling \$18 million. One investment of \$6.8 million will provide for 73 units of affordable housing. As of year-end 2011, one prior period investment totaling \$746 thousand remained outstanding.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in all of the limited-scope areas is not inconsistent with the performance noted in the state of New York.

In addition to investments in the full- and limited-scope areas, TDBNA originated investments that benefited areas of New York other than its specific AAs. In the current evaluation period, the bank made six such investments totaling \$51.3 million. It also has three prior period investments of \$3.8 million.

SERVICE TEST

Performance in the Poughkeepsie MSA is excellent. Performance in the limited-scope AAs did not impact the Service Test rating for New York.

Conclusion for Areas Receiving Full-Scope Reviews

Retail Delivery Systems - The bank's branches are readily accessible to geographies and individuals of different incomes. During the evaluation period, TDBNA closed two branches, one which was located in a moderate-income geography. However, the bank has two branches that are in close proximity to the branch that closed. TDBNA did not open any branches.

Community Development Services - TDBNA provided a good level of CD services to the Poughkeepsie MSA through board and committee participation in various organizations that target the identified needs of the community. These needs include financial literacy, homeownership training for LMI families, and small business education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Service Test performance in the non-metropolitan area is weaker than the performance under the Service Test in the state of New York, primarily due to weaker branch distributions. Service Test performance in all other New York AAs is not inconsistent with the bank's excellent Service Test performance in the state.

Refer to Tables 1-15 in the New York section of Appendix D for the facts and data that support all Test conclusions.

State of Vermont Rating

CRA Rating for State:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent geographic and borrower distributions combined with good lending activity resulted in excellent performance in the full-scope area. CD lending had a significantly positive impact on the rating.
- Excellent responsiveness to the investment needs of the AA through the volume of qualified investments originated during the evaluation period.
- Excellent Service Test performance is the result of excellent branch distribution combined with a good level of CD services.

Description of Institution's Operations in the State of Vermont

TDBNA has three AAs within the state. One is located in a MSA and two are in non-metropolitan areas. Statewide, the bank holds \$2 billion in deposits which represents 2.4% of the bank's total deposits. Within Vermont, 39% of the deposits are concentrated within the Burlington MSA, which received a full-scope review. The combined non-metropolitan areas were reviewed using limited-scope procedures. The limited-scope areas contained 61% of the bank's deposits within the state and, therefore, influenced the ratings in the state.

LENDING TEST

Lending performance in the Burlington MSA is excellent. Performance in the limited-scope areas did not impact performance in Vermont.

Conclusion for Areas Receiving Full-Scope Reviews

Lending Activity - Lending activity is good. For home purchase and home improvement loans, we noted a modest volume of loans as well as significantly lower market shares than deposit share. The bank originated a good volume of home refinance and small business loans. TDBNA did achieve good lending market rank for all products.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels is excellent. This is supported by excellent distributions of home purchase and home refinance loans combined with good distributions of home improvement and small business loans. More weight was placed on performance in the moderate-income geographies given the low level of owner-occupied housing in low-income geographies. We did not identify any geographic gaps in lending.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of borrowers is excellent. We noted excellent distribution of home improvement and small loans to businesses and good distribution of home purchase and home refinance loans.

Community Development Lending - CD lending had a significantly positive impact on lending performance. TDBNA originated 38 CD loans totaling \$124.3 million. Measured in dollars, 99% of CD lending supported construction of 131 units of affordable housing for LMI residents and 1% funded community services.

Product Innovation and Flexibility - TDBNA's use of flexible or innovative loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated twelve FHA loans totaling \$1.9 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Lending Test performance in the non-metropolitan area is not inconsistent with the overall excellent performance in the state of Vermont.

INVESTMENT TEST

Performance in the Burlington MSA is excellent. Performance in the limited-scope AA did not impact the Investment Test rating for New York.

Conclusion for Areas Receiving Full-Scope Reviews

TDBNA's investment volume in the Burlington MSA is excellent. During the evaluation period, the bank made 69 investments in the MSA totaling \$50.6 million. As of year-end 2011, three prior period investments totaling \$1.8 million remained outstanding.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Investment Test performance in the non-metropolitan area is not inconsistent with the overall excellent performance in the state of Vermont.

In addition to investments in the full- and limited-scope areas, TDBNA originated investments that benefited areas of Vermont other than its specific AAs. TDBNA made nine investments totaling \$728 thousand. It also has two prior period investments with remaining balances totaling \$3.2 million. These investments further demonstrate TDBNA's commitment to a wide array of community development needs within the state.

SERVICE TEST

Performance in the Burlington MSA is excellent. Performance in limited-scope AA did not impact the Service Test rating for Vermont.

Conclusion for Areas Receiving Full-Scope Reviews

Retail Delivery Systems - The bank's branches are readily accessible to all portions of the MSA. During the evaluation period, TDBNA closed one branch in a middle-income geography. Services and products offered by bank branches are consistent across the branch network. Branch hours are excellent and average 50 hours per week.

Community Development Services - TDBNA provided a good level of CD services to the Burlington MSA. TDBNA provided a strong level of leadership in the MSA through board and committee participation in various organizations that target the needs of the community. These identified needs include financial literacy, homeownership training for LMI families, and small business education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Service Test performance in the non-metropolitan area is not inconsistent with the excellent performance in the state of Vermont.

Refer to Tables 1-15 in the Vermont section of Appendix D for the facts and data that support all Test 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 and Retail Service Tests (excludes CD loans): 1/1/2008-12/31/2010 CD Loans:1/1/2008 - 12/31/2011 CD Investment and Services: 1/1/2009 - 12/31/2011	
Financial Institution	Products Reviewed	
TD Bank, N.A. (TDBNA) Wilmington, Delaware	HMDA and Small Business CD Lending, Investments, and Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
TD Charitable Foundation TD Community Development Corporation	Affiliate Subsidiary	Grants CD Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
New York-Northern New Jersey-Long Island MMSA New York-White Plains-Wayne MD Edison MD Nassau-Suffolk MD Newark-Union MD Philadelphia-Camden-Wilmington MMSA Philadelphia MD Camden MD Wilmington MD Boston-Cambridge-Quincy MMSA Peabody MD Cambridge MD Boston MD Rockingham MD	Full-Scope Limited-Scope Limited-Scope Limited-Scope Full-Scope Limited-Scope Limited-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope	

State of Connecticut Hartford MSA New Haven MSA Bridgeport MSA Norwich MSA Non MSA CT State of Massachusetts Springfield MSA Barnstable MSA Pittsfield MSA Providence MSA Worcester MSA State of Maine Portland MSA Bangor MSA Lewiston MSA Non MSA ME Allentown-Bethlehem-Easton MMSA Washington-Arlington-Alexandria MMSA Washington MMSA Bethesda MD State of Delaware Dover MSA State of Florida West Palm Beach MSA Fort Lauderdale MSA Miami MSA State of Maryland Baltimore MSA State of New Hampshire Manchester MSA Non MSA NH State of New Jersey Atlantic City MSA Ocean City MSA Trenton-Ewing MSA Vineland-Millville-Bridgeton MSA State of New York Poughkeepsie MSA Glen Falls MSA Albany MSA Kingston AA Non-MSA NY	Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Full-Scope Full-Scope Limited-Scope Full-Scope Full-Scope Limited-Scope Full-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope	
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State of Vermont Burlington MSA Non MSA VT	Full-Scope Limited-Scope	
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Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS TD Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
TD Bank, N.A.	Outstanding	Outstanding	High Satisfactory	Outstanding
Multistate Metropolitan Area or State:				
New York-New Jersey-Long Island MMA	Outstanding	Outstanding	High Satisfactory	Outstanding
Philadelphia-Camden-Wilmington (PA-NJ-DE) MMA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Boston-Cambridge-Quincy (MA-NH) MSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Connecticut	Outstanding	Outstanding	High Satisfactory	Outstanding
Massachusetts	Outstanding	Outstanding	Outstanding	Outstanding
Maine	Outstanding	Outstanding	Outstanding	Outstanding
Allentown-Bethlehem-Easton (PA-NJ) MMA	High Satisfactory	Outstanding	Low Satisfactory	High Satisfactory
Washington-Arlington-Alexandria (DC-VA) MMA	Outstanding	Outstanding	High Satisfactory	Outstanding
Delaware	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Florida	Outstanding	Outstanding	Outstanding	Outstanding
Maryland	Outstanding	Outstanding	Low Satisfactory	Outstanding
New Hampshire	High Satisfactory	Outstanding	Outstanding	Outstanding
New Jersey	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
New York	Outstanding	Outstanding	Outstanding	Outstanding
Vermont	Outstanding	Outstanding	Outstanding	Outstanding

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

Appendix C: Market Profiles for Primary Rating Areas

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Market Profiles for Areas Receiving Full-Scope Reviews in Primary Rating Areas

NEW YORK-WHITE PLAINS-WAYNE NY-NJ MULTISTATE METROPOLITAN DIVISION.....	C-2
PHILADELPHIA PA METROPOLITAN DIVISION.....	C-4
BOSTON-QUINCY MA METROPOLITAN DIVISION.....	C-6
HARTFORD CT MSA.....	C-8
SPRINGFIELD MA MSA.....	C-10
PORTLAND ME MSA.....	C-12

New York-Northern New Jersey-Long Island Multistate Metropolitan Area

New York-White Plains-Wayne Multistate MD

Demographic Information for Full-scope Area: New York-Wayne-White Plains MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2921	11.64	24.58	28.48	33.07	2.23
Population by Geography	11,296,377	12.39	26.06	26.15	35.24	0.16
Owner-Occupied Housing by Geography	1,592,309	2.00	11.78	26.47	59.75	0.00
Business by Geography	1,089,046	6.65	18.35	22.15	51.85	1.01
Farms by Geography	7,556	2.50	8.22	18.09	70.91	0.28
Family Distribution by Income Level	2,705,548	25.76	15.40	16.77	42.07	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	1,113,466	22.20	36.69	25.23	15.87	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level		49,461 65,600 17%	Median Housing Value Unemployment Rate (BLS- December 2010)	450,700 8.1%		

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

Source: 2000 US Census and 2010 HUD updated MFI, Bureau of Labor Statistics, National Association of Realtors-4th Quarter 2010

The AA consists of the New York-White Plains-Wayne MD in its entirety and includes the counties that comprise the five boroughs of New York City (New York, Kings, Queens, Bronx, and Richmond Counties) and Putnam, Rockland and Westchester Counties. The AA also includes Bergen, Hudson, and Passaic Counties in Northern New Jersey. The 2010 HUD adjusted median family income for the AA is approximately \$66 thousand; however, there are significant disparities in the income levels throughout the counties which comprise the AA. New York County (Manhattan) is among the richest counties in the U.S. while the poverty level of the AA (17%) is quite high. Within Bronx and Kings Counties, areas have over 20% poverty rates.

TDBNA has \$18.5 billion in deposits in this AA representing 22.5% of the bank's deposits. The bank operates 179 branches. As of June 30, 2010 the bank ranked ninth in deposit market share with 1.86% well behind the market leaders JPMorgan Chase with a 41.4% market share; Bank of New York Mellon with an 8.8%; and Citibank with an 8.7% market share.

New York City, consisting of Bronx, Kings, New York, Queens, and Richmond Counties, is the most significant economic contributor to the AA. New York City is home to a diversified mix of businesses, with many national and international corporations headquartered there. Historically, the downtown area has been dominated by the financial services industry. Industries operating in the midtown area include advertising, publishing, and garment production. The retail sector is a major employer along with health and social care. In addition, tourism continues to be one of New York City's most vital industries with more than

40 million tourists visiting the city annually. Some of the AA's largest employers are New York Presbyterian Healthcare Systems, Citigroup, JPMorgan Chase, Verizon, and Starwood Hotels.

The New York City economy has struggled following the recession that began in late 2008. The unemployment rate for the greater MSA has more than doubled since 2006 and as of December 31, 2010 was at 8.1%, with even greater levels within metro New York City, at 9.5%. Wall Street is a significant contributor to employment in the area and suffered significant layoffs following the financial crisis which have yet to rebound.

Housing prices have dropped significantly over the past several years. The median single family housing value for the AA in 2010 was approximately \$450 thousand and is a decline from \$494 thousand in 2008 and \$540 thousand in 2007. Despite the significant drop in housing values, the high cost of living associated with this area continues to make home ownership difficult, especially for LMI populations. Nearly 60% of the families in the MD are low- or moderate-income. Additionally, as noted earlier, approximately 17% of the population is below the poverty level. Of the approximately 1.5 million owner-occupied housing units, just 2% are in low-income census tracts.

The opportunities for community development participation within the AA are broad. There are numerous community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through their contacts and experience in the market, TDBNA has identified the critical needs within the AA to be the lack of affordable housing for purchase or rent and the lack of leadership in the provision of financial education and counseling, non-profit capacity building, and small business development.

During this evaluation, we met with representatives from two community-based affordable housing organizations operating in the AA. In addition, OCC representatives met with various community development organizations during the evaluation period. The contacts were with organizations supporting affordable housing, economic development, small business development, and services targeted toward LMI families. These organizations confirmed the community needs identified by the bank, and added the need for additional grants, affordable multifamily housing financed through tax credits, and assistance for special-needs populations.

Philadelphia-Camden-Wilmington PA-NJ-DE Multistate Metropolitan Area

Philadelphia MD

Demographic Information for Full-scope Area: Philadelphia MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	987	12.26	19.45	33.03	33.43	1.82
Population by Geography	3,849,647	12.19	20.88	31.83	34.94	0.16
Owner-Occupied Housing by Geography	997,858	8.68	18.44	33.17	39.71	0.00
Business by Geography	450,186	7.35	15.75	29.30	46.94	0.66
Farms by Geography	6,792	1.56	5.23	35.78	57.36	0.07
Family Distribution by Income Level	970,405	22.16	17.16	20.53	40.14	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	381,626	22.13	30.68	30.28	16.91	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below Poverty Level		56,993 76,200 12%	Median Housing Value Unemployment Rate (BLS- December 2010)		220,700 8.1%	

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

Source: 2000 US Census and 2010 HUD updated MFI. Bureau of Labor Statistics, National Association of Realtors 2010

The Philadelphia, PA MD is located in eastern Pennsylvania and is comprised of Bucks, Chester, Delaware, Montgomery, and Philadelphia Counties. The principle economic and population center is the City of Philadelphia. The 2010 HUD adjusted median family income for this AA is approximately \$76 thousand. The poverty level of the AA is 12%, however, within Philadelphia, there are areas where nearly 25% of the population is living below the poverty level.

TDBNA has \$9.3 billion in deposits in the MD representing 11.4% of the bank's deposits. As of June 30, 2010, the bank ranked fourth with 8.9% deposit market share, well behind first ranked Wells Fargo with 25.6% market share. Other institutions include Citizens Bank with 11.8% market share and PNC with a 9.7% market share. TDNA operates 87 branches within the AA.

Philadelphia is the most significant economic contributor to the AA. The city's leading industries include state and local government, health services, and higher education. In addition, it is anticipated that tourism will become an increased contributor to the economy with the opening of the city's first casino in September 2011 and the \$700 million expansion of the city's convention center. Some of the area's largest employers are Jefferson Health System, University of Pennsylvania, University of Pennsylvania Health System, and Merck.

The Philadelphia economy continues to struggle following the recession that began in late 2008. The unemployment rate in the city has more than doubled since 2008 and as of year-end 2010 was at 8.1%. Housing prices have declined over the past several years, though not as significantly as in other major cities throughout the country. At year-end 2010, the median single family housing value was approximately \$220 thousand, a decline of 6% from 2007.

The opportunities for community development participation within the AA are broad. There are numerous community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through their contacts and experience in the market, TDBNA has identified the critical needs within the AA to be the lack of affordable housing, leadership on the boards of various community development organizations, and development of mortgage programs at for LMI borrowers at below market rates.

During this evaluation, we met with representatives from two community-based affordable housing organizations operating in the AA. In addition, OCC representatives met with various community development organizations during the evaluation period. The contacts were with organizations supporting affordable housing, economic development, small business development, and services targeted toward LMI families. These organizations confirmed the community needs identified by the bank, and added the need for additional grants, affordable multifamily housing financed through tax credits, and assistance for special-needs populations.

Boston-Cambridge-Quincy MA-NH Multistate Metropolitan Area

Peabody MD

Demographic Information for Full-scope Area: Peabody MA MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	156	9.62	21.15	47.44	21.79	0.00
Population by Geography	723,419	6.49	18.99	49.28	25.25	0.00
Owner-Occupied Housing by Geography	175,022	1.66	11.05	55.92	31.37	0.00
Business by Geography	71,113	5.36	13.89	50.29	30.46	0.00
Farms by Geography	1,318	1.29	8.57	53.26	36.87	0.00
Family Distribution by Income Level	186,043	20.76	17.43	21.99	39.82	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	71,044	11.66	28.19	46.77	13.38	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level		63,556 83,900 9%	Median Housing Value Unemployment Rate (December 2010)		320,000 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, Bureau of Labor Statistics, National Association of Realtors-2010

The Peabody MD is comprised of Essex County in Massachusetts, whose largest cities are Lawrence and Salem. The 2010 HUD adjusted median family income for this AA is approximately \$84 thousand with approximately 9% of households living below poverty level.

TDBNA has over \$2 billion in deposits within this AA, representing 2.4% of the bank's deposits. The bank operates 31 branches. As of June 30, 2010, TDBNA ranked first in deposit market share with 11.5%, followed by Eastern Bank with 10.2%, and Salem Five Cents Savings and Sovereign Bank each with 8.9%.

The area's major industries include health care, education, and the services trades. Some of the area's largest employers are the North Shore Children's Hospital, GE Aviation, NSMC Outpatient Health, and Seacoast Lock and Safe Company.

The AA is a high cost area with housing affordability a challenge. Although housing prices have declined over the past few years, the median price was \$320 thousand in the 4th quarter of 2010. This is a 16% decrease from \$380 thousand in 2007. Combined, 38% of the families in the AA are LMI. Additionally, less than 2% of the 175,000 owner-occupied housing units are located in low-income geographies. Lastly, foreclosure data from the Foreclosure Monitor (07/2010) found the cities of Brockton and Lawrence to have among the highest rates of distressed units with both foreclosure order and deeds increasing from 2009 to 2010.

Opportunities exist for community development participation within the AA. Through their contacts and experience in the market, TDBNA has identified the lack of affordable housing, a

lack of leadership in the provision of financial education and counseling, and the need for grant dollars to support the efforts of various community development organizations.

As part of the review, we met with representatives from five different community development organizations operating in the AA. These organizations confirmed the community needs identified by the bank and that overall homeownership costs have also become a concern in the community.

State of Connecticut

Hartford MSA

Demographic Information for Full-Scope Area: Hartford						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	283	14.13	15.55	45.23	24.38	0.71
Population by Geography	1,148,618	9.56	13.97	48.25	28.14	0.08
Owner-Occupied Housing by Geography	295,785	2.33	9.56	53.21	34.90	0.00
Business by Geography	132,331	8.68	11.71	48.27	31.10	0.24
Farms by Geography	3,178	1.76	6.54	50.57	41.10	0.03
Family Distribution by Income Level	298,162	20.19	17.69	23.41	38.71	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	112,948	17.55	21.00	45.68	15.78	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below Poverty Level		64,156 84,700 8%	Median Housing Value Unemployment Rate (December 2010)		236,600 8.7%	

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

Source: 2000 US Census and 2010 HUD updated MFI, Bureau of Labor Statistics, National Association of Realtors-4th Quarter 2010

The Hartford MSA is comprised of Hartford, Middlesex, and Tolland counties in Connecticut, whose largest city is Hartford. Its principal cities include Hartford, West Hartford, East Hartford and Middletown. This particular area of Connecticut is different from other parts of the state since it is not dependent on out-of-state metropolitan areas such as Boston or New York City. The region's economy is closely tied with Springfield, MA because Hartford and Springfield are "twin cities" and only 25 miles apart.

TDBNA has approximately \$2.7 billion in deposits within this AA. The bank operates 28 branches. As of June 30, 2010, TDBNA ranked third in deposit market share with 7.23%. Bank of America with 39.2% and Webster Bank with 11.4% ranked first and second, respectively.

Hartford is nicknamed the "Insurance Capital of the World" as many insurance companies are headquartered there and it remains the region's major industry. The AA's leading employers included United Technologies Corporation (Aeronautics), Hartford Financial Services Group, Aetna Inc. and Travelers Insurance Company (Insurance), Hartford Hospital and John Dempsey Hospital (Healthcare). Aetna consolidated its base of operations closing its Middletown facilities and relocating employees to the Hartford offices; this created a boost to Hartford that offset ING's moving out of the area.

Like many urban communities, Hartford remains financially challenged. The demand for services remains high and growing while there is less money available. Hartford is one of the poorest central

cities with one of the highest unemployment rates in the country. Additionally, the City's housing priorities were identified as 1) Expanding homeownership, 2) development of affordable, multi-family rental properties focusing on eliminating blight and accommodating the elderly or veterans, and 3) preservation of existing housing stock and the high rate of deteriorated housing for neighborhood stabilization.

According to the National Low Income Housing Coalition, the Fair Market Rent ("FMR") for a two-bedroom apartment was \$1,095 as compared to \$1,196 for the state of CT. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$3,650 monthly, \$43,800 annually, or \$21.06 hourly if working full-time. A minimum wage worker earned an hourly wage of \$8.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 102 hours per week all year-round; or a household must include 2.6 minimum wage earner(s) working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

Opportunities exist for community development participation within the AA. Through their contacts and experience in the market, TDBNA has identified the lack of affordable housing as a critical need of the AA. Other needs identified include capacity building for CD organizations.

As part of the review, we met with representatives from two different community development organizations operating in the AA. These organizations confirmed the community needs identified by the bank and that overall homeownership costs have also become a concern in the community.

Commonwealth of Massachusetts

Springfield MSA

Demographic Information for Full-Scope Area: Springfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	140	12.14	16.43	45.71	25.00	0.71
Population by Geography	680,014	8.43	17.83	48.62	25.13	0.00
Owner-Occupied Housing by Geography	164,620	2.29	11.06	56.42	30.22	0.00
Business by Geography	56,446	9.71	15.52	47.39	27.38	0.00
Farms by Geography	1,517	0.99	6.53	55.17	37.31	0.00
Family Distribution by Income Level	168,966	21.40	17.35	22.20	39.05	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	65,476	15.11	23.30	47.26	14.33	0.00
Median Family Income		51,150	Median Housing Value	189,900		
HUD Adjusted Median Family Income for 2010		67,400	Unemployment Rate	9%		
Households Below Poverty Level		13%	(December 2010)			

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

Source: 2000 US Census and 2010 HUD updated MFI, Bureau of Labor Statistics, National Association of Realtors-4th Quarter 2010

The AA consists of the entire MSA which is made up of Franklin, Hampden, and Hampshire counties. The principle city is Springfield. According to the Pioneer Valley Planning Commission, Springfield is the cultural and commercial center of Pioneer Valley. It is the third largest city in Massachusetts, and combined with the surrounding communities, constitutes the fourth largest MA in New England. Five of the Pioneer Valley region's twenty largest employers are located in Springfield.

This AA represents TDBNA's largest deposit base in Massachusetts. TDBNA has \$1.4 billion in deposits and is ranked second in the MSA with a deposit market share of 11.9%. Bank of America, NA ranks first with a market share of 12.5%.

Springfield is known as the "City of Firsts" for its automobile industry innovations including: the first gasoline-powered automobile was built in 1891 and the first gas-powered cycle was built in 1901. The City is home to the Basketball Hall of Fame and claims the invention of basketball. Springfield is known for its state-of-the-art medical facilities including Mercy Hospital, Kindred Hospital Park View, Shriners Hospital for Children, Baystate Medical Center, and Tufts Medical School teaching hospital.

Unemployment for the AA has climbed since 2007 when the rate was 4.6%. In December 2010, the unemployment rate was 9%. The emerging green technology markets present an opportunity to grow the precision manufacturing industry. The growth will need to be supported by an educated workforce, but may offer the entry level learner on-the-job employment that is needed to produce livable wages for LMI and under-educated populations.

Opportunities exist for community development participation within the AA. Through their contacts and experience in the market, TDBNA has identified the lack of affordable housing as a critical need of the AA.

As part of the review, we met with representatives from two different community development organizations operating in the AA. These organizations confirmed the community needs identified by the bank and additionally have identified workforce development, technical assistance for minority-owned businesses, and community revitalization efforts that will help attract new businesses and more people to the downtown areas and central business districts in the area, particularly in Springfield and Holyoke.

State of Maine

Portland MSA

Demographic Information for Full-Scope Area: Portland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	108	2.78	13.89	70.37	12.96	0.00
Population by Geography	487,568	1.33	11.65	73.75	13.26	0.00
Owner-Occupied Housing by Geography	136,405	0.32	8.72	75.71	15.26	0.00
Business by Geography	54,489	1.52	14.14	71.71	12.63	0.00
Farms by Geography	1,276	0.71	9.64	72.26	17.40	0.00
Family Distribution by Income Level	128,775	17.58	19.29	25.12	38.01	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	47,478	1.78	16.11	73.88	8.23	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below Poverty Level		52,773 68,600 8%	Median Housing Value Unemployment Rate (December 2010)		131,222 5.9%	

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

Source: 2000 US Census and 2010 HUD updated MFI, Bureau of Labor Statistics, National Association of Realtors-4th Quarter 2010

The Portland AA encompasses the entire Portland-South Portland-Biddeford MSA, which consists of Cumberland, Sagadahoc, and York counties. This MSA is the state's largest metro area and its "urban heart". Its principal cities include Portland and South Portland in Cumberland County and Biddeford in York County.

Portland historically was the headquarters for the bank. As of June 30, 2010, TDBNA had \$1.7 billion in deposits and ranked second in the MSA with a deposit market share of 11.1%. Its affiliate, TD Bank USA NA, ranks first with a 40.9% market share.

As of December 2010, the Bureau of Labor Statistics reported the unemployment rate in the Portland AA at 5.9%, as compared to the statewide unemployment rate of 7.5% and a national rate of 8.3%. While the Portland MSA fared better than the state, most job growth was in lower paying service sector positions related to call centers and seasonal/tourism industries.

The Portland AA economy is centered in financial services, health services, wholesale distribution and retail services. Another important factor of the Maine economy is the small business sector. About 89% of the state's private employers have fewer than 50 employees and 9% of all individuals are self-employed. The largest employers in the Portland AA included Maine Medical Center, Bath Iron Works, LL Bean, Unum Provident, and Mercy Hospital.

The Portland AA was adversely impacted by the economic downturn that gripped the entire country. As the area began to rebound, Brunswick Naval Air Station (BNAS) located in

Sagadahoc County closed in May 2011. At one time, BNAS was home to more than 3,000 military personnel and civilians. Economic development at the base commenced after the closure, and the base is now known as Brunswick Landing and will contain an airport and a "Green Energy Park." Despite the setback and the potential fallout from the closure, the Portland AA remains the strongest economic region of the state and the economic outlook is positive.

The AA has many opportunities available in the areas of community development lending, services and investment. Our assessment of community development opportunities was based on OCC internal resources, community contacts and public information. Our community contacts indicated that an influx of immigrants and an increasing number of baby boomers reaching retirement age have created a demand for affordable housing. Both of our community contacts indicated that TD Bank dedicated a substantial amount of time and money to community development activities, particularly affordable housing.

Appendix D: Tables of Performance Data

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Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. Community development loans to statewide or regional entities or made outside the bank’s AA may receive positive CRA consideration. See Interagency Q&As __.12 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's AA. See Interagency Q&As __.12 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such investments.

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

Table 1. Lending Volume

LENDING VOLUME												
Geography: MULTI-NY-NJ												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010												
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:												
New York-Wayne-White Plains MD	49.84	5,018	1,698,343	6,250	494,121	4	400	43	127,063	11,315	2,319,927	54.78
Limited Review:												
Edison MD	21.13	3,683	764,675	2,343	198,401	4	69	6	20,621	6,036	983,766	18.21
Nassau-Suffolk MD	13.67	1,619	502,448	1,686	118,547	1	50	10	15,375	3,316	636,420	13.81
Newark MD	15.36	1,810	456,414	1,619	148,725	1	1	18	109,675	3,431	714,765	13.21

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MULTI-NY-NJ				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans**						
Full Review:																
New York-Wayne-White Plains MD	1,657	41.63	2.00	4.47	11.78	19.43	26.48	21.30	59.75	54.80	1.45	2.94	2.54	1.10	1.24	
Limited Review:																
Edison MD	1,227	30.83	3.50	2.36	14.87	19.40	51.71	55.34	29.93	22.90	2.39	1.89	3.10	2.78	1.46	
Nassau-Suffolk MD	511	12.84	0.22	0.39	12.21	21.72	66.17	61.45	21.40	16.44	1.27	1.92	2.18	1.13	0.99	
Newark MD	585	14.70	3.15	9.40	12.31	15.73	35.02	36.58	49.52	38.29	1.70	3.90	2.36	1.89	1.09	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTI-NY-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
New York-Wayne-White Plains MD	1,030	40.86	2.00	1.84	11.78	8.16	26.48	21.17	59.75	68.83	12.33	8.43	9.67	11.88	12.98	
Limited Review:																
Edison MD	752	29.83	3.50	0.93	14.87	14.63	51.71	63.03	29.93	21.41	10.59	2.70	9.21	11.92	9.14	
Nassau-Suffolk MD	410	16.26	0.22	0.24	12.21	10.24	66.17	71.95	21.40	17.56	9.56	0.00	7.64	9.53	11.22	
Newark MD	329	13.05	3.15	1.82	12.31	8.51	35.02	35.56	49.52	54.10	9.06	2.27	7.46	9.12	9.65	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: MULTI-NY-NJ		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																		
New York-Wayne-White Plains MD	2,271	40.90	2.00	1.89	11.78	10.79	26.48	17.17	59.75	70.15	1.48	2.54	2.59	1.27	1.40			
Limited Review:																		
Edison MD	1,702	30.65	3.50	1.06	14.87	16.63	51.71	54.05	29.93	28.26	1.24	1.16	2.19	1.28	0.97			
Nassau-Suffolk MD	693	12.48	0.22	0.00	12.21	10.97	66.17	65.08	21.40	23.95	1.25	0.00	1.59	1.23	1.16			
Newark MD	887	15.97	3.15	2.14	12.31	8.68	35.02	31.68	49.52	57.50	1.00	2.42	2.02	0.97	0.89			

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MULTI-NY-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
New York-Wayne-White Plains MD	53	76.81	17.72	11.32	29.34	50.94	21.19	16.98	31.74	20.75	0.57	1.02	0.86	0.18	0.42	
Limited Review:																
Edison MD	2	2.90	7.81	0.00	24.08	100.00	53.46	0.00	14.66	0.00	0.00	0.00	0.00	0.00	0.00	
Nassau-Suffolk MD	5	7.25	3.51	0.00	27.94	20.00	58.07	80.00	10.49	0.00	0.00	0.00	0.00	0.00	0.00	
Newark MD	9	13.04	25.36	11.11	33.76	0.00	25.56	66.67	15.32	22.22	1.06	2.70	0.00	2.13	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 Multifamily 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: MULTI-NY-NJ Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
New York-Wayne-White Plains MD	6,219	52.42	6.65	2.07	18.35	12.00	22.15	21.90	51.85	64.03	1.26	0.61	1.05	1.30	1.36
Limited Review:															
Edison MD	2,341	19.73	3.04	1.54	13.68	13.41	51.01	55.23	32.17	29.82	2.36	1.28	3.11	2.65	1.96
Nassau-Suffolk MD	1,685	14.20	0.58	0.06	12.84	9.85	62.87	65.64	23.70	24.45	1.29	0.00	1.15	1.37	1.29
Newark MD	1,619	13.65	8.92	3.58	16.51	8.77	31.46	27.86	43.11	59.79	1.93	1.46	1.57	1.71	2.23

* 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: MULTI-NY-NJ				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
New York-Wayne-White Plains MD	4	40.00	2.50	0.00	8.22	0.00	18.09	0.00	70.91	100.00	0.44	0.00	0.00	0.00	0.85	
Limited Review:																
Edison MD	4	40.00	1.04	50.00	9.20	25.00	53.74	25.00	36.02	0.00	4.49	100.00	8.33	2.44	0.00	
Nassau-Suffolk MD	1	10.00	0.34	0.00	17.96	0.00	65.40	100.00	16.29	0.00	0.74	0.00	0.00	1.28	0.00	
Newark MD	1	10.00	1.18	0.00	6.55	0.00	36.42	0.00	55.85	100.00	1.02	0.00	0.00	0.00	1.79	

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTI-NY-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
New York-Wayne-White Plains MD	1,659	41.66	25.76	0.73	15.40	7.98	16.77	19.47	42.07	71.83	1.57	1.59	1.78	1.43	1.60	
Limited Review:																
Edison MD	1,227	30.81	19.11	9.98	18.58	38.42	22.73	19.37	39.58	32.23	2.62	3.15	4.58	1.58	1.93	
Nassau-Suffolk MD	511	12.83	18.03	5.28	18.61	32.68	24.19	23.29	39.18	38.75	1.36	0.92	1.97	0.96	1.34	
Newark MD	585	14.69	22.05	6.75	16.60	33.39	20.25	24.22	41.11	35.64	1.85	2.43	3.04	1.69	1.23	

* 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 0.7% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTI-NY-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
New York-Wayne-White Plains MD	1,030	40.86	25.76	4.78	15.40	8.38	16.77	19.01	42.07	67.84	12.91	16.41	9.71	13.04	13.15	
Limited Review:																
Edison MD	752	29.83	19.11	11.45	18.58	22.77	22.73	31.42	39.58	34.35	10.91	7.76	10.31	12.68	10.86	
Nassau-Suffolk MD	410	16.26	18.03	10.54	18.61	20.34	24.19	28.43	39.18	40.69	9.92	7.77	7.74	10.62	11.29	
Newark MD	329	13.05	22.05	8.23	16.60	14.33	20.25	25.91	41.11	51.52	9.46	8.55	7.96	8.72	10.58	

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of 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.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MULTI-NY-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families** *	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
New York-Wayne-White Plains MD	2,276	40.95	25.76	0.89	15.40	5.74	16.77	13.39	42.07	79.98	1.67	1.20	1.97	1.41	1.71	
Limited Review:																
Edison MD	1,702	30.62	19.11	6.76	18.58	20.39	22.73	26.85	39.58	45.99	1.43	1.79	1.99	1.24	1.32	
Nassau-Suffolk MD	693	12.47	18.03	3.39	18.61	25.48	24.19	25.18	39.18	45.95	1.34	0.89	2.15	0.97	1.30	
Newark MD	887	15.96	22.05	3.69	16.60	17.19	20.25	19.95	41.11	59.17	1.14	1.68	2.04	0.99	1.01	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: MULTI-NY-NJ									
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:									
New York-Wayne-White Plains MD	6,250	52.53	66.04	67.58	84.40	8.74	6.86	1.26	4.13
Limited Review:									
Edison MD	2,343	19.69	68.77	71.36	82.71	8.62	8.66	2.36	6.17
Nassau-Suffolk MD	1,686	14.17	70.83	72.18	86.54	6.35	7.12	1.29	4.68
Newark MD	1,619	13.61	68.32	64.24	83.51	8.15	8.34	1.93	4.81

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

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

*** 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 9.04% 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: MULTI-NY-NJ			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
New York-Wayne-White Plains MD	4	40.00	96.43	25.00	50.00	50.00	0.00	0.44	0.00
Limited Review:									
Edison MD	4	40.00	96.09	100.00	100.00	0.00	0.00	4.49	6.90
Nassau-Suffolk MD	1	10.00	96.73	100.00	100.00	0.00	0.00	0.74	1.41
Newark MD	1	10.00	96.80	100.00	100.00	0.00	0.00	1.02	2.13

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

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MULTI-NY-NJ				Evaluation Period: JANUARY 1, 2009 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:									
New York-Wayne-White Plains MD	6	4,207	639	228,975	645	233,182	47.68	31	100,750
Limited Review:									
Edison MD	2	3,274	189	108,370	191	111,644	22.83	7	20,431
Nassau-Suffolk MD	0	0	127	51,329	127	51,329	10.49	3	12,776
Newark MD	6	6,028	167	86,925	173	92,953	19.00	14	40,798

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: MULTI-NY-NJ			
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																			
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						
Full Review:																			
New York-Wayne-White Plains MD	54.78	179	52.49	2.23	13.41	22.91	61.45	26	13	0	5	3	5	12.39	26.06	26.15	35.24		
Limited Review:																			
Edison MD	18.21	61	17.89	1.64	14.75	60.66	22.95	1	0	0	0	1	0	3.91	17.20	51.81	26.93		
Nassau-Suffolk MD	13.81	46	13.49	0.00	8.70	73.91	17.39	12	0	0	2	7	3	0.76	16.02	64.36	18.86		
Newark MD	13.21	55	16.13	5.45	7.27	36.36	50.91	3	5	0	0	0	-2	11.19	22.22	30.44	36.15		

Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE-PA-NJ-DE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						
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:												
Philadelphia MD	57.85	4,626	833,591	2,704	251,183	0	0	20	27,939	7,350	1,112,713	17.48
Limited Review:												
Camden NJ MD	36.47	4,049	521,668	1,755	152,184	4	236	11	27,383	5,819	701,471	11.15
Wilmington DE-NJ MD	5.68	544	87,548	242	21,859	0	0	0	0	786	109,407	71.37

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MULTISTATE-PA-NJ-DE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****					
Full Review:															
Philadelphia MD	1,513	64.47	8.68	12.49	18.44	26.90	33.17	28.02	39.71	32.58	1.40	3.40	2.01	1.27	1.04
Limited Review:															
Camden NJ MD	700	29.83	3.02	3.00	9.38	9.71	62.69	60.00	24.91	27.29	1.89	2.16	1.97	1.83	1.98
Wilmington DE-NJ MD	134	5.71	1.80	0.75	14.52	17.16	54.85	66.42	28.83	15.67	1.10	0.87	0.72	1.38	0.78

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE-PA-NJ-DE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:															
Philadelphia MD	1,113	42.11	8.68	6.74	18.44	15.18	33.17	36.57	39.71	41.51	6.17	4.24	4.48	6.22	7.31
Limited Review:															
Camden NJ MD	1,376	52.06	3.02	1.02	9.38	7.56	62.69	63.74	24.91	27.69	25.24	16.67	25.27	24.44	27.58
Wilmington DE-NJ MD	154	5.83	1.80	1.30	14.52	12.34	54.85	59.74	28.83	26.62	7.68	0.00	8.33	7.72	7.86

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: MULTISTATE-PA-NJ-DE		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																					
Philadelphia MD	1,976	47.06	8.68	3.29	18.44	13.61	33.17	29.71	39.71	53.39	1.04	1.67	1.61	1.01	0.95						
Limited Review:																					
Camden NJ MD	1,969	46.89	3.02	0.66	9.38	6.65	62.69	57.90	24.91	34.79	2.84	7.20	4.64	2.73	2.72						
Wilmington DE-NJ MD	254	6.05	1.80	1.97	14.52	19.29	54.85	46.85	28.83	31.89	0.96	1.05	1.57	0.96	0.82						

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MULTISTATE-PA-NJ-DE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Philadelphia MD	24	82.76	7.67	20.83	21.08	20.83	39.16	20.83	32.08	37.50	1.08	5.00	1.23	0.00	1.61	
Limited Review:																
Camden NJ MD	3	10.34	6.64	0.00	24.73	33.33	57.35	66.67	11.28	0.00	4.55	0.00	0.00	7.14	0.00	
Wilmington DE-NJ MD	2	6.90	7.02	0.00	21.60	0.00	53.03	100.00	18.35	0.00	4.00	0.00	0.00	8.33	0.00	

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of Multifamily 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: MULTISTATE-PA-NJ-DE Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Philadelphia MD	2,675	57.37	7.35	4.11	15.75	11.33	29.30	29.23	46.94	55.33	2.25	2.05	2.06	2.25	2.38
Limited Review:															
Camden NJ MD	1,746	37.44	3.82	0.86	9.81	8.36	58.79	54.64	27.33	36.14	4.77	1.09	4.64	4.85	5.23
Wilmington DE-NJ MD	242	5.19	10.85	3.72	13.84	16.53	49.16	50.41	26.07	29.34	1.23	0.79	1.57	1.33	1.11

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

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATE-PA-NJ-DE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Philadelphia MD	0	0.00	1.56	0.00	5.23	0.00	35.78	0.00	57.36	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Camden NJ MD	4	100.00	0.65	0.00	6.90	0.00	61.56	100.00	30.85	0.00	4.62	0.00	0.00	10.00	0.00	
Wilmington DE-NJ MD	0	0.00	1.83	0.00	10.20	0.00	63.98	0.00	23.98	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: MULTISTATE-PA-NJ-DE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Philadelphia MD	1,513	64.47	22.16	12.92	17.16	32.44	20.53	21.00	40.14	33.65	1.54	1.08	2.41	1.19	1.36	
Limited Review:																
Camden NJ MD	700	29.83	18.85	11.65	18.50	36.40	24.62	20.29	38.03	31.65	2.16	1.69	3.01	1.27	2.27	
Wilmington DE-NJ MD	134	5.71	19.03	16.03	17.76	45.80	23.68	15.27	39.54	22.90	1.21	1.36	1.79	0.51	1.00	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MULTISTATE-PA-NJ-DE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Philadelphia MD	1,113	42.11	22.16	10.76	17.16	17.96	20.53	26.44	40.14	44.85	6.26	3.60	4.47	6.92	7.94	
Limited Review:																
Camden NJ MD	1,376	52.06	18.85	11.87	18.50	20.95	24.62	28.94	38.03	38.24	25.36	19.57	21.06	25.66	29.45	
Wilmington DE-NJ MD	154	5.83	19.03	13.91	17.76	23.18	23.68	30.46	39.54	32.45	7.72	7.09	6.14	10.90	6.50	

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

* 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 1.1% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: MULTISTATE-PA-NJ-DE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Philadelphia MD	1,976	47.05	22.16	4.13	17.16	19.38	20.53	20.88	40.14	55.61	1.15	0.91	1.72	0.89	1.14									
Limited Review:																								
Camden NJ MD	1,970	46.90	18.85	6.51	18.50	23.40	24.62	23.04	38.03	47.06	3.44	4.56	4.46	2.49	3.45									
Wilmington DE-NJ MD	254	6.05	19.03	5.65	17.76	31.05	23.68	19.35	39.54	43.95	1.15	0.57	2.29	0.74	0.97									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATE-PA-NJ-DE			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Philadelphia MD	2,704	57.52	64.12	69.67	80.58	10.54	8.88	2.25	5.00
Limited Review:									
Camden NJ MD	1,755	37.33	67.46	70.94	81.54	9.46	9.00	4.77	10.17
Wilmington DE-NJ MD	242	5.15	66.43	66.94	78.93	9.09	11.98	1.23	2.03

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 8.55% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATE-PA-NJ-DE			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Philadelphia MD	0	0.00	95.60	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Camden NJ MD	4	100.00	95.92	50.00	75.00	25.00	0.00	4.62	5.00
Wilmington DE-NJ MD	0	0.00	95.46	0.00	0.00	0.00	0.00	0.00	0.00

Table 14. Qualified Investments

* 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 25.00% of small loans to farms originated and purchased by the bank.

QUALIFIED INVESTMENTS		Geography: MULTISTATE-PA-NJ-DE				Evaluation Period: JANUARY 1, 2009 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:									
Philadelphia MD	5	3,856	261	91,340	266	95,196	38.26	16	19,818
Limited Review:									
Camden NJ MD	1	698	135	107,527	136	108,225	43.50	6	13,082
Wilmington DE-NJ MD	2	292	77	20,469	79	20,761	8.35	3	7,166
Broader/Statewide	1	4,592	9	20,041	10	24,633	9.9	1	1,000

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
Geography: MULTISTATE-PA-NJ-DE																	
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:																	
Philadelphia MD	17.48	87	57.62	1.15	10.34	31.03	57.47	2	3	0	1	0	-2	12.19	20.88	31.83	34.94
Limited Review:																	
Camden NJ MD	11.15	51	33.77	1.96	11.76	56.86	29.41	1	1	0	1	-1	0	6.00	12.38	59.47	22.13
Wilmington DE-NJ MD	71.37	13	8.61	23.08	0.00	53.85	23.08	2	0	0	0	0	2	4.61	17.50	53.45	24.44

Table 1. Lending Volume

LENDING VOLUME		Geography: MULT-BOSTON MA-NH				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						
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:												
Peabody MD	24.22	1,788	365,309	2,228	192,792	15	610	22	60,303	4,031	619,014	31.44
Limited Review:												
Boston MD	24.83	1,434	450,244	1,068	149,622	4	150	8	34,669	2,506	634,685	17.90
Cambridge MD	30.66	2,095	535,241	2,003	228,450	1	10	4	19,850	4,099	783,551	27.17
Rockingham NH MD	20.09	1,607	264,738	2,727	248,206	29	923	5	4,686	4,363	518,553	23.49

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MULT-BOSTON MA-NH					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans**						
Full Review:																
Peabody MD	415	24.73	1.66	6.27	11.05	20.00	55.92	55.42	31.37	18.31	1.93	2.84	3.16	1.90	1.10	
Limited Review:																
Boston MD	443	26.40	1.97	6.55	14.35	18.96	46.50	38.83	37.18	35.67	0.73	1.18	1.04	0.74	0.54	
Cambridge MD	494	29.44	0.94	4.66	14.92	26.92	53.92	49.60	30.23	18.83	0.89	2.16	1.49	0.80	0.59	
Rockingham NH MD	326	19.43	0.00	0.00	16.82	18.71	63.78	63.19	19.40	18.10	1.67	0.00	2.26	1.78	0.89	

* 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: MULT-BOSTON MA					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010								
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:															
Peabody MD	306	26.75	1.66	2.61	11.05	9.48	55.92	61.76	31.37	26.14	10.45	25.00	8.70	12.46	7.13
Limited Review:															
Boston MD	149	13.02	1.97	2.68	14.35	20.81	46.50	38.26	37.18	38.26	2.13	0.00	4.05	1.34	2.54
Cambridge MD	309	27.01	0.94	3.24	14.92	19.09	53.92	58.25	30.23	19.42	6.00	17.65	7.40	6.25	4.68
Rockingham NH MD	380	33.22	0.00	0.00	16.82	17.63	63.78	66.05	19.40	16.32	20.78	0.00	21.26	20.21	22.15

* 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: MULT-BOSTON MA-NH					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Peabody MD	1,057	26.05	1.66	0.95	11.05	9.18	55.92	53.17	31.37	36.71	1.68	3.45	3.58	1.89	1.17									
Limited Review:																								
Boston MD	828	20.40	1.97	4.71	14.35	17.39	46.50	32.85	37.18	45.05	0.46	1.49	0.86	0.41	0.40									
Cambridge MD	1,283	31.62	0.94	0.55	14.92	15.04	53.92	55.26	30.23	29.15	0.75	1.47	1.08	0.76	0.63									
Rockingham NH MD	890	21.93	0.00	0.00	16.82	12.13	63.78	66.63	19.40	21.24	2.50	0.00	3.40	2.42	2.39									

* 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: MULT-BOSTON MA-NH				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
Peabody MD	10	22.73	14.41	0.00	28.40	30.00	46.94	60.00	10.24	10.00	1.10	0.00	0.00	3.13	0.00
Limited Review:															
Boston MD	14	31.82	13.39	14.29	29.57	7.14	31.06	14.29	25.97	64.29	0.73	0.00	1.10	0.00	1.85
Cambridge MD	9	20.45	7.40	0.00	30.67	44.44	48.78	44.44	13.16	11.11	0.54	0.00	0.00	1.61	0.00
Rockingham NH MD	11	25.00	0.00	0.00	30.35	9.09	64.88	90.91	4.78	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 Multifamily 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: MULT-BOSTON MA-NH Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Peabody MD	2,228	27.76	5.36	4.44	13.89	9.25	50.29	56.69	30.46	29.62	6.48	4.87	4.77	7.49	6.25
Limited Review:															
Boston MD	1,068	13.31	9.17	7.21	14.83	13.86	35.58	29.96	40.40	48.97	1.03	1.05	1.16	0.67	1.36
Cambridge MD	2,003	24.96	2.86	3.49	16.58	15.38	50.74	59.21	29.82	21.92	2.67	3.88	2.89	3.03	1.98
Rockingham NH MD	2,727	33.98	0.00	0.00	16.31	13.46	66.91	72.64	16.78	13.90	12.27	0.00	13.26	13.21	9.95

* 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: MULT-BOSTON MA-NH					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Peabody MD	15	30.61	1.29	0.00	8.57	13.33	53.26	53.33	36.87	33.33	13.51	0.00	50.00	13.64	8.33	
Limited Review:																
Boston MD	4	8.16	1.81	0.00	8.49	0.00	49.23	25.00	40.47	75.00	0.00	0.00	0.00	0.00	0.00	
Cambridge MD	1	2.04	0.97	0.00	10.99	0.00	54.13	100.00	33.91	0.00	0.00	0.00	0.00	0.00	0.00	
Rockingham NH MD	29	59.18	0.00	0.00	10.42	6.90	68.73	79.31	20.84	13.79	28.89	0.00	0.00	36.36	20.00	

* 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: MULT-BOSTON MA-NH					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Peabody MD	415	24.73	20.76	9.29	17.43	41.08	21.99	18.58	39.82	31.05	2.20	1.76	4.00	1.09	1.60	
Limited Review:																
Boston MD	443	26.40	21.69	5.73	17.14	22.94	21.61	13.76	39.56	57.57	0.85	0.69	1.17	0.29	1.02	
Cambridge MD	494	29.44	19.32	13.59	18.26	24.54	22.74	24.75	39.69	37.12	1.03	1.51	1.04	0.86	1.03	
Rockingham NH MD	326	19.43	16.53	9.85	19.79	22.77	26.38	27.69	37.30	39.69	1.91	1.58	1.06	2.01	2.74	

* 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 0.9% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULT-BOSTON MA-NH					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Peabody MD	306	26.75	20.76	8.50	17.43	22.22	21.99	24.84	39.82	44.44	10.84	9.88	13.73	10.00	10.26	
Limited Review:																
Boston MD	149	13.02	21.69	6.71	17.14	13.42	21.61	28.19	39.56	51.68	2.24	0.90	1.55	2.10	2.87	
Cambridge MD	309	27.01	19.32	13.31	18.26	23.70	22.74	25.97	39.69	37.01	6.26	8.96	6.26	5.97	5.89	
Rockingham NH MD	380	33.22	16.53	14.06	19.79	27.32	26.38	30.50	37.30	28.12	21.39	17.78	25.15	20.85	20.63	

* 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 0.3% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: MULT-BOSTON MA-NH					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Peabody MD	1,057	26.05	20.76	4.80	17.43	21.40	21.99	23.70	39.82	50.10	1.98	1.99	3.72	1.68	1.65									
Limited Review:																								
Boston MD	828	20.40	21.69	2.43	17.14	12.65	21.61	22.51	39.56	62.41	0.55	0.45	0.44	0.42	0.65									
Cambridge MD	1,283	31.62	19.32	7.72	18.26	19.50	22.74	26.76	39.69	46.02	0.87	1.13	0.82	0.87	0.87									
Rockingham NH MD	890	21.93	16.53	8.45	19.79	20.38	26.38	27.59	37.30	43.58	3.04	3.36	3.10	3.03	2.97									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULT-BOSTON MA-NH			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Peabody MD	2,228	27.76	69.24	65.93	82.76	10.91	6.33	6.48	12.20
Limited Review:									
Boston MD	1,068	13.31	65.85	54.40	72.00	13.30	14.70	1.03	1.95
Cambridge MD	2,003	24.96	66.76	62.76	77.48	12.33	10.18	2.67	5.06
Rockingham NH MD	2,727	33.98	70.44	64.87	80.89	11.59	7.52	12.27	19.43

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 12.17% 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: MULT-BOSTON MA-NH			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Peabody MD	15	30.61	96.59	66.67	100.00	0.00	0.00	13.51	8.00
Limited Review:									
Boston MD	4	8.16	95.52	75.00	100.00	0.00	0.00	0.00	0.00
Cambridge MD	1	2.04	95.51	0.00	100.00	0.00	0.00	0.00	0.00
Rockingham NH MD	29	59.18	97.67	79.31	100.00	0.00	0.00	28.89	25.00

* 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 20.41% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MULT-BOSTON MA-NH				Evaluation Period: JANUARY 1, 2009 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:									
Peabody MD	5	2,623	93	20,216	98	22,839	25.81	3	5,768
Limited Review:									
Boston MD	7	3,215	115	24,994	122	28,209	31.87	5	9,275
Cambridge MD	1	90	94	21,021	95	21,111	23.86	6	7,832
Rockingham NH MD	4	1,089	56	15,249	60	16,338	18.46	4	7,090

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MULT-BOSTON MA-NH Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
Peabody MD	31.44	31	29.52	3.23	16.13	64.52	16.13	0	3	0	0	-1	-2	6.49	18.99	49.28	25.25
Limited Review:																	
Boston MD	17.90	19	18.10	10.53	10.53	21.05	57.89	2	2	1	0	0	-1	7.06	23.54	40.00	29.24
Cambridge MD	27.17	32	30.48	3.13	15.63	53.13	28.13	4	0	0	1	2	1	3.46	22.32	49.69	24.54
Rockingham NH MD	23.49	23	21.90	0.00	17.39	69.57	13.04	1	0	0	0	1	0	0.00	19.21	63.51	17.27

Table 1. Lending Volume

LENDING VOLUME		Geography: CONNECTICUT				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						
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:												
Hartford	44.27	1,725	288,712	1,854	204,643	9	796	12	21,583	3,600	515,734	50.80
Limited Review:												
Bridgeport	22.77	418	179,587	642	74,862	0	0	8	10,757	1,060	265,206	21.20
New Haven	27.03	944	159,486	1,280	133,990	3	135	7	21,342	2,227	314,953	23.60
Non MSA -CT	5.16	234	35,360	301	24,500	3	225	0	0	538	60,085	3.46
Norwich-New London	0.77	30	4,160	43	4,838	0	0	0	0	73	8,998	0.94

Table 2. Geographic Distribution of Home Purchase Loans

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Geographic Distribution: HOME PURCHASE		Geography: CONNECTICUT				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
Hartford	402	43.98	2.33	1.99	9.56	7.71	53.21	58.46	34.90	31.84	0.90	0.53	0.61	0.99	0.85
Limited Review:															
Bridgeport	148	16.19	3.34	4.05	16.53	21.62	39.53	39.19	40.60	35.14	0.61	0.28	0.54	0.54	0.74
New Haven	291	31.84	3.04	5.84	12.33	21.65	52.39	49.48	32.24	23.02	1.33	1.72	3.02	1.14	0.91
Non MSA -CT	67	7.33	0.00	0.00	4.21	7.46	62.74	65.67	33.05	26.87	1.84	0.00	1.00	1.96	1.75
Norwich-New London	6	0.66	0.00	0.00	0.00	0.00	20.55	33.33	79.45	66.67	0.00	0.00	0.00	0.00	0.00

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Hartford	352	57.05	2.33	1.70	9.56	6.25	53.21	68.18	34.90	23.86	6.98	8.11	7.10	7.94	5.41	
Limited Review:																
Bridgeport	59	9.56	3.34	3.39	16.53	20.34	39.53	37.29	40.60	38.98	3.07	10.00	5.06	3.20	2.36	
New Haven	153	24.80	3.04	1.31	12.33	11.76	52.39	56.21	32.24	30.72	5.04	0.00	5.94	6.58	3.11	
Non MSA -CT	45	7.29	0.00	0.00	4.21	15.56	62.74	60.00	33.05	24.44	3.69	0.00	21.43	3.20	2.70	
Norwich-New London	8	1.30	0.00	0.00	0.00	0.00	20.55	12.50	79.45	87.50	10.34	0.00	0.00	0.00	16.67	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010								
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:															
Hartford	958	53.46	2.33	0.94	9.56	4.91	53.21	57.72	34.90	36.43	1.09	1.11	0.86	1.33	0.85
Limited Review:															
Bridgeport	206	11.50	3.34	2.43	16.53	15.53	39.53	42.23	40.60	39.81	0.41	0.77	0.78	0.40	0.35
New Haven	490	27.34	3.04	2.24	12.33	9.59	52.39	57.14	32.24	31.02	1.20	3.09	2.02	1.43	0.80
Non MSA -CT	122	6.81	0.00	0.00	4.21	9.02	62.74	61.48	33.05	29.51	1.18	0.00	4.76	1.36	0.76
Norwich-New London	16	0.89	0.00	0.00	0.00	0.00	20.55	25.00	79.45	75.00	1.32	0.00	0.00	3.95	0.94

* 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: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Hartford	13	46.43	26.86	30.77	21.47	23.08	39.96	38.46	11.71	7.69	2.50	0.00	0.00	3.70	12.50	
Limited Review:																
Bridgeport	5	17.86	20.80	20.00	42.87	20.00	29.03	0.00	7.31	60.00	2.38	0.00	5.56	0.00	0.00	
New Haven	10	35.71	20.52	10.00	29.27	70.00	42.05	10.00	8.16	10.00	4.23	0.00	11.76	2.86	0.00	
Non MSA -CT	0	0.00	0.00	0.00	10.71	0.00	70.82	0.00	18.47	0.00	0.00	0.00	0.00	0.00	0.00	
Norwich-New London	0	0.00	0.00	0.00	0.00	0.00	27.04	0.00	72.96	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 Multifamily 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: CONNECTICUT Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Hartford	1,853	44.99	8.68	6.15	11.71	11.71	48.27	57.91	31.10	24.23	3.94	4.48	4.59	4.62	3.01
Limited Review:															
Bridgeport	642	15.59	7.56	12.15	19.04	17.60	33.66	32.24	39.74	38.01	1.20	2.03	0.95	1.18	1.23
New Haven	1,280	31.08	7.47	5.47	17.54	19.77	43.19	46.80	31.78	27.97	3.59	2.89	4.67	4.23	2.77
Non MSA -CT	301	7.31	0.00	0.00	5.92	14.62	59.78	45.51	34.29	39.87	3.20	0.00	8.70	2.55	3.93
Norwich-New London	43	1.04	0.00	0.00	0.00	0.00	34.16	60.47	65.84	39.53	0.79	0.00	1.23	0.86	0.59

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

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Hartford	9	60.00	1.76	0.00	6.54	0.00	50.57	44.44	41.10	55.56	8.93	0.00	0.00	14.29	7.14	
Limited Review:																
Bridgeport	0	0.00	5.30	0.00	20.26	0.00	35.42	0.00	39.02	0.00	0.00	0.00	0.00	0.00	0.00	
New Haven	3	20.00	2.83	0.00	11.09	0.00	42.07	66.67	44.02	33.33	2.44	0.00	0.00	9.09	0.00	
Non MSA -CT	3	20.00	0.00	0.00	2.00	0.00	57.28	33.33	40.72	66.67	2.78	0.00	0.00	0.00	8.33	
Norwich-New London	0	0.00	0.00	0.00	0.00	0.00	27.50	0.00	72.50	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: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Hartford	402	43.98	20.19	10.53	17.69	26.57	23.41	26.32	38.71	36.59	0.97	0.71	0.77	0.87	1.39	
Limited Review:																
Bridgeport	148	16.19	21.61	12.93	17.25	23.13	19.58	11.56	41.56	52.38	0.68	0.65	0.54	0.23	0.97	
New Haven	291	31.84	20.85	14.88	17.34	34.95	22.55	20.42	39.26	29.76	1.45	2.65	1.68	0.85	1.40	
Non MSA -CT	67	7.33	14.09	10.45	17.23	41.79	25.90	20.90	42.79	26.87	2.02	2.55	2.92	1.52	1.35	
Norwich-New London	6	0.66	11.32	0.00	14.45	33.33	23.03	33.33	51.20	33.33	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Hartford	352	57.05	20.19	10.69	17.69	22.54	23.41	29.77	38.71	36.99	7.06	5.39	6.75	6.76	7.93	
Limited Review:																
Bridgeport	59	9.56	21.61	10.17	17.25	22.03	19.58	16.95	41.56	50.85	3.26	5.63	3.20	3.01	2.97	
New Haven	153	24.80	20.85	6.67	17.34	27.33	22.55	23.33	39.26	42.67	5.08	3.53	5.35	5.56	4.90	
Non MSA -CT	45	7.29	14.09	4.76	17.23	26.19	25.90	30.95	42.79	38.10	3.80	3.33	3.37	4.42	3.68	
Norwich-New London	8	1.30	11.32	25.00	14.45	12.50	23.03	12.50	51.20	50.00	10.34	100.00	0.00	0.00	15.38	

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

* 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 1.9% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Hartford	958	53.46	20.19	6.80	17.69	20.40	23.41	28.24	38.71	44.56	1.27	1.20	1.17	1.34	1.28									
Limited Review:																								
Bridgeport	206	11.50	21.61	9.31	17.25	19.61	19.58	19.12	41.56	51.96	0.46	0.41	0.73	0.46	0.40									
New Haven	490	27.34	20.85	7.01	17.34	21.65	22.55	24.95	39.26	46.39	1.37	2.01	1.76	1.06	1.35									
Non MSA -CT	122	6.81	14.09	3.33	17.23	29.17	25.90	25.83	42.79	41.67	1.37	0.00	2.48	1.63	0.99									
Norwich-New London	16	0.89	11.32	6.25	14.45	18.75	23.03	25.00	51.20	50.00	1.56	8.33	1.30	0.54	2.09									

Table 11. Borrower Distribution of Small Loans to Businesses

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CONNECTICUT			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Hartford	1,854	45.00	67.89	59.17	78.91	11.92	9.17	3.94	6.54
Limited Review:									
Bridgeport	642	15.58	68.81	63.86	76.64	12.15	11.21	1.20	3.13
New Haven	1,280	31.07	68.18	57.03	80.55	11.09	8.36	3.59	6.47
Non MSA -CT	301	7.31	72.51	67.44	90.37	6.31	3.32	3.20	5.26
Norwich-New London	43	1.04	74.64	44.19	76.74	13.95	9.30	0.79	0.37

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 12.21% 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: CONNECTICUT			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Hartford	9	60.00	96.85	44.44	77.78	22.22	0.00	8.93	0.00
Limited Review:									
Bridgeport	0	0.00	97.25	0.00	0.00	0.00	0.00	0.00	0.00
New Haven	3	20.00	96.79	66.67	100.00	0.00	0.00	2.44	0.00
Non MSA -CT	3	20.00	98.48	33.33	100.00	0.00	0.00	2.78	0.00
Norwich-New London	0	0.00	97.50	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 26.67% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CONNECTICUT				Evaluation Period: JANUARY 1, 2009 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:									
Hartford	3	6,339	102	32,543	105	38,882	43.55	5	13,105
Limited Review:									
Bridgeport	4	3,318	69	16,586	73	19,904	22.29	4	5,876
New Haven	3	2,922	77	24,215	80	27,137	30.39	5	13,872
Non MSA -CT	0	0	3	559	3	559	0.63	0	0
Norwich-New London	0	0	2	210	2	210	0.24	0	0
Statewide	2	1,250	8	1,338	10	2,588	2.90	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
Geography: CONNECTICUT																	
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				
Full Review:																	
Hartford	50.80	28	35.00	10.71	7.14	60.71	21.43	1	2	0	0	-1	0	9.56	13.97	48.25	28.14
Limited Review:																	
Bridgeport	21.20	21	26.25	9.52	19.05	42.86	28.57	1	1	0	0	1	-1	10.24	22.80	33.16	33.80
New Haven	23.60	26	32.50	7.69	19.23	53.85	19.23	3	3	0	2	-1	-1	9.45	19.46	45.77	25.31
Non MSA -CT	3.46	4	5.00	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.00	6.20	62.58	31.23
Norwich-New London	0.94	1	1.25	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	23.76	76.24

Table 1. Lending Volume

LENDING VOLUME		Geography: MASSACHUSETTS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						
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:												
Springfield	31.59	1,535	207,650	1,720	212,937	9	729	17	16,867	3,281	438,183	37.82
Limited Review:												
Barnstable	29.63	999	256,260	1,442	149,449	27	1,936	4	3,413	2,472	411,058	23.54
Pittsfield	6.15	252	36,396	413	42,034	10	235	3	6,750	678	85,415	7.74
Providence Multistate	2.27	125	26,209	88	4,897	0	0	1	500	214	31,606	1.83
Worcester	30.36	1,139	203,642	1,478	204,150	7	430	1	12,947	2,633	421,169	29.06

Table 2. Geographic Distribution of Home Purchase Loans

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Geographic Distribution: HOME PURCHASE		Geography: MASSACHUSETTS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
Springfield	413	36.29	2.29	1.45	11.06	15.98	56.42	54.00	30.22	28.57	1.96	1.09	2.97	1.94	1.65
Limited Review:															
Barnstable	222	19.51	0.44	3.60	5.19	10.81	78.19	72.07	16.18	13.51	2.36	11.11	4.05	2.14	2.20
Pittsfield	52	4.57	0.62	0.00	12.05	9.62	71.43	75.00	15.89	15.38	0.86	0.00	0.00	1.00	0.99
Providence Multistate	23	2.02	0.00	0.00	0.00	0.00	22.11	8.70	77.89	91.30	0.53	0.00	0.00	0.28	0.61
Worcester	428	37.61	1.46	3.97	12.32	20.79	57.33	54.44	28.90	20.79	2.27	6.28	4.11	2.28	1.20

* 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: MASSACHUSETTS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:															
Springfield	360	47.24	2.29	1.39	11.06	10.56	56.42	60.56	30.22	27.50	8.52	14.29	12.60	8.87	6.89
Limited Review:															
Barnstable	126	16.54	0.44	1.59	5.19	7.14	78.19	79.37	16.18	11.90	9.68	0.00	4.17	9.96	9.71
Pittsfield	64	8.40	0.62	0.00	12.05	17.19	71.43	73.44	15.89	9.38	5.36	0.00	10.61	4.90	3.66
Providence Multistate	28	3.67	0.00	0.00	0.00	0.00	22.11	25.00	77.89	75.00	4.96	0.00	0.00	8.33	4.21
Worcester	184	24.15	1.46	2.17	12.32	18.48	57.33	60.33	28.90	19.02	4.68	12.50	3.43	5.31	3.59

* 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 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: MASSACHUSETTS					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Springfield	758	35.64	2.29	0.40	11.06	10.29	56.42	55.41	30.22	33.91	2.32	3.26	3.93	2.27	2.10									
Limited Review:																								
Barnstable	651	30.61	0.44	0.77	5.19	6.76	78.19	74.81	16.18	17.67	2.46	6.45	2.63	2.37	2.67									
Pittsfield	131	6.16	0.62	1.53	12.05	11.45	71.43	69.47	15.89	17.56	1.40	0.00	2.12	1.48	0.88									
Providence Multistate	74	3.48	0.00	0.00	0.00	0.00	22.11	21.62	77.89	78.38	0.49	0.00	0.00	1.17	0.39									
Worcester	513	24.12	1.46	1.17	12.32	13.45	57.33	54.19	28.90	31.19	0.92	1.32	1.76	0.96	0.78									

* 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: MASSACHUSETTS					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Springfield	4	18.18	26.23	50.00	22.69	50.00	38.81	0.00	12.28	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Barnstable	0	0.00	9.03	0.00	19.74	0.00	63.10	0.00	8.13	0.00	0.00	0.00	0.00	0.00	0.00	
Pittsfield	5	22.73	15.95	40.00	32.01	40.00	38.37	20.00	13.67	0.00	0.00	0.00	0.00	0.00	0.00	
Providence Multistate	0	0.00	0.00	0.00	0.00	0.00	32.32	0.00	67.68	0.00	0.00	0.00	0.00	0.00	0.00	
Worcester	13	59.09	16.82	7.69	30.32	53.85	39.75	38.46	13.12	0.00	7.32	4.76	13.33	3.70	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 Multifamily 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: MASSACHUSETTS Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Springfield	1,720	33.46	9.71	12.33	15.52	12.85	47.39	44.53	27.38	30.29	5.57	5.73	6.47	5.40	5.83
Limited Review:															
Barnstable	1,442	28.05	6.64	8.53	7.97	7.42	69.57	74.76	15.82	9.29	9.13	8.90	11.74	10.41	6.22
Pittsfield	413	8.04	7.44	12.35	14.38	13.56	62.54	59.32	15.64	14.77	5.64	13.68	5.97	5.49	5.18
Providence Multistate	88	1.71	0.00	0.00	0.00	0.00	24.71	23.86	75.29	76.14	0.58	0.78	0.42	0.36	0.87
Worcester	1,477	28.74	5.36	7.92	17.02	18.48	48.76	50.58	28.62	23.02	4.60	6.49	5.84	4.83	3.72

* 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: MASSACHUSETTS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
Springfield	9	16.98	0.99	0.00	6.53	0.00	55.17	66.67	37.31	33.33	5.08	0.00	0.00	7.14	3.70
Limited Review:															
Barnstable	27	50.94	1.59	0.00	6.24	14.81	75.71	77.78	16.46	7.41	38.89	0.00	100.00	38.46	50.00
Pittsfield	10	18.87	1.01	0.00	8.06	20.00	73.80	30.00	17.13	50.00	18.52	0.00	100.00	7.14	30.00
Providence Multistate	0	0.00	0.00	0.00	0.00	0.00	20.81	0.00	79.19	0.00	0.00	0.00	0.00	0.00	0.00
Worcester	7	13.21	1.02	0.00	7.23	0.00	55.19	100.00	36.49	0.00	2.70	0.00	0.00	5.88	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: MASSACHUSETTS					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Springfield	413	36.29	21.40	9.29	17.35	31.05	22.20	25.92	39.05	33.74	2.17	1.52	2.95	1.58	2.06	
Limited Review:																
Barnstable	222	19.51	17.31	6.39	19.45	17.35	23.97	17.81	39.26	58.45	2.62	5.88	3.42	1.85	2.47	
Pittsfield	52	4.57	18.39	2.00	19.87	24.00	23.55	16.00	38.18	58.00	0.92	0.00	0.39	0.40	1.67	
Providence Multistate	23	2.02	10.71	0.00	13.45	9.09	20.53	27.27	55.31	63.64	0.60	0.00	0.32	0.52	0.89	
Worcester	428	37.61	20.29	12.47	17.67	42.12	22.54	17.18	39.50	28.24	2.59	3.35	4.26	1.22	1.73	

* 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 1.1% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MASSACHUSETTS					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Springfield	360	47.18	21.40	11.08	17.35	23.30	22.20	30.11	39.05	35.51	8.54	10.85	9.45	8.26	7.85	
Limited Review:																
Barnstable	126	16.51	17.31	7.94	19.45	17.46	23.97	25.40	39.26	49.21	10.00	8.00	6.57	9.36	12.41	
Pittsfield	64	8.39	18.39	12.70	19.87	19.05	23.55	28.57	38.18	39.68	5.53	6.78	2.56	6.38	6.28	
Providence Multistate	28	3.67	10.71	7.14	13.45	7.14	20.53	25.00	55.31	60.71	5.18	12.50	3.13	3.92	5.63	
Worcester	185	24.25	20.29	12.22	17.67	26.11	22.54	30.00	39.50	31.67	4.84	7.27	4.74	5.01	4.15	

* 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 1.8% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MASSACHUSETTS					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Springfield	758	35.64	21.40	5.99	17.35	23.97	22.20	25.17	39.05	44.87	2.60	3.41	3.82	1.92	2.46	
Limited Review:																
Barnstable	651	30.61	17.31	5.24	19.45	17.26	23.97	20.65	39.26	56.86	2.87	3.39	4.31	2.40	2.68	
Pittsfield	131	6.16	18.39	5.51	19.87	15.75	23.55	25.98	38.18	52.76	1.51	2.19	1.77	1.64	1.31	
Providence Multistate	74	3.48	10.71	5.41	13.45	12.16	20.53	29.73	55.31	52.70	0.59	1.04	1.24	0.57	0.48	
Worcester	513	24.12	20.29	8.32	17.67	21.39	22.54	23.56	39.50	46.73	1.08	2.13	1.40	0.83	1.02	

* 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MASSACHUSETTS			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Springfield	1,720	33.46	67.85	59.01	74.30	12.79	12.91	5.57	9.15
Limited Review:									
Barnstable	1,442	28.05	70.54	64.01	77.81	12.14	10.06	9.13	16.58
Pittsfield	413	8.03	67.27	59.81	78.93	10.41	10.65	5.64	6.79
Providence Multistate	88	1.71	67.91	79.55	94.32	2.27	3.41	0.58	1.42
Worcester	1,478	28.75	68.00	57.24	72.26	12.31	15.43	4.60	8.18

* 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 9.49% 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: MASSACHUSETTS			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Springfield	9	16.98	97.17	44.44	77.78	22.22	0.00	5.08	3.03
Limited Review:									
Barnstable	27	50.94	96.59	62.96	74.07	22.22	3.70	38.89	33.33
Pittsfield	10	18.87	96.73	50.00	100.00	0.00	0.00	18.52	0.00
Providence Multistate	0	0.00	95.95	0.00	0.00	0.00	0.00	0.00	0.00
Worcester	7	13.21	96.93	57.14	71.43	28.57	0.00	2.70	0.00

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

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

*** 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 20.75% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Geography: MASSACHUSETTS Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Springfield	2	969	94	13,395	96	14,364	16.76	2	3,785
Limited Review:									
Barnstable	2	865	41	14,165	43	15,030	17.53	3	9,615
Pittsfield	2	300	35	1,929	37	2,229	2.60	1	34
Providence Multistate	0	0	12	352	12	352	0.41	0	0
Worcester	1	474	77	27,046	78	27,520	32.10	3	2,796
Statewide	9	8,025	10	18,200	19	26,225	30.60	3	982

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MASSACHUSETTS																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
Springfield	37.82	26	37.14	7.69	23.08	50.00	19.23	0	1	0	0	-1	0	8.43	17.83	48.62	25.13
Limited Review:																	
Barnstable	23.54	18	25.71	11.11	11.11	72.22	5.56	1	3	0	0	-2	0	1.55	7.25	76.21	14.98
Pittsfield	7.74	7	10.00	14.29	28.57	42.86	14.29	0	1	0	0	-1	0	2.72	16.73	65.66	14.90
Providence Multistate	1.83	2	2.86	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	26.02	73.98
Worcester	29.06	17	24.29	11.76	35.29	47.06	5.88	1	0	0	0	1	0	6.08	18.12	51.85	23.81

Table 1. Lending Volume

LENDING VOLUME		Geography: MAINE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						
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:												
Portland ME	58.93	3,097	556,634	3,554	357,519	87	3,499	14	28,374	6,738	946,026	53.49
Limited Review:												
Bangor	6.70	539	57,018	438	45,253	17	1,743	2	3,500	994	107,514	5.58
Lewiston	6.95	415	47,873	491	55,182	2	105	4	8,306	908	111,466	9.10
Non MSA-ME	27.42	1,922	217,249	1,946	180,609	277	29,813	17	12,560	4,162	440,231	31.83

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MAINE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Portland ME	700	48.31	0.32	0.86	8.72	7.00	75.71	74.86	15.26	17.29	3.31	6.45	2.91	3.20	3.96	
Limited Review:																
Bangor	121	8.35	0.00	0.00	12.67	14.88	65.64	61.16	21.69	23.97	1.86	0.00	2.01	2.11	1.23	
Lewiston	110	7.59	1.34	2.73	7.96	9.09	75.02	77.27	15.69	10.91	3.32	0.00	6.06	3.60	1.32	
Non MSA-ME	518	35.75	0.00	0.00	4.77	4.44	84.41	89.38	10.81	6.18	4.28	0.00	4.58	4.49	2.53	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MAINE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						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:																
Portland ME	509	44.22	0.32	0.39	8.72	7.86	75.71	75.05	15.26	16.70	12.06	0.00	16.16	10.23	18.21	
Limited Review:																
Bangor	130	11.29	0.00	0.00	12.67	12.31	65.64	66.15	21.69	21.54	11.17	0.00	14.29	10.86	10.58	
Lewiston	77	6.69	1.34	0.00	7.96	6.49	75.02	77.92	15.69	15.58	13.74	0.00	9.09	14.65	12.20	
Non MSA-ME	435	37.79	0.00	0.00	4.77	4.60	84.41	89.20	10.81	6.21	13.47	0.00	10.42	14.11	8.79	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: MAINE		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																					
Portland ME	1,864	56.23	0.32	0.43	8.72	7.67	75.71	71.67	15.26	20.23	3.78	6.78	4.70	3.66	3.88						
Limited Review:																					
Bangor	277	8.36	0.00	0.00	12.67	10.11	65.64	58.12	21.69	31.77	4.29	0.00	5.70	3.58	5.29						
Lewiston	216	6.52	1.34	0.46	7.96	5.09	75.02	72.69	15.69	21.76	5.48	0.00	7.35	5.51	5.28						
Non MSA-ME	958	28.90	0.00	0.00	4.77	3.97	84.41	85.39	10.81	10.65	5.39	0.00	6.57	5.58	4.07						

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MAINE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****						
Full Review:																
Portland ME	24	41.38	6.36	0.00	24.62	25.00	64.22	62.50	4.79	12.50	7.32	0.00	7.69	6.67	25.00	
Limited Review:																
Bangor	11	18.97	0.00	0.00	40.03	9.09	39.91	54.55	20.07	36.36	14.29	0.00	0.00	22.22	14.29	
Lewiston	12	20.69	28.02	0.00	28.64	41.67	39.07	8.33	4.27	50.00	5.56	0.00	14.29	0.00	0.00	
Non MSA-ME	11	18.97	0.00	0.00	8.54	45.45	82.46	54.55	9.01	0.00	3.33	0.00	16.67	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 Multifamily 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: MAINE																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
Portland ME	3,554	55.28	1.52	1.91	14.14	13.53	71.71	68.49	12.63	16.07	11.37	14.18	9.81	11.96	12.55		
Limited Review:																	
Bangor	438	6.81	0.00	0.00	18.67	14.16	56.97	63.01	24.36	22.83	4.71	0.00	2.71	5.70	4.59		
Lewiston	491	7.64	8.71	8.76	9.72	5.50	70.05	70.06	11.53	15.68	9.60	6.56	7.41	9.48	18.05		
Non MSA-ME	1,946	30.27	0.00	0.00	5.10	7.19	82.50	83.61	12.40	9.20	6.53	0.00	8.88	7.67	3.88		

* 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).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MAINE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Portland ME	87	22.72	0.71	0.00	9.64	4.60	72.26	86.21	17.40	9.20	38.96	0.00	25.00	44.44	12.50	
Limited Review:																
Bangor	17	4.44	0.00	0.00	15.31	5.88	63.70	94.12	20.99	0.00	16.13	0.00	0.00	20.83	0.00	
Lewiston	2	0.52	2.12	0.00	4.24	0.00	73.31	100.00	20.34	0.00	0.00	0.00	0.00	0.00	0.00	
Non MSA-ME	277	72.32	0.00	0.00	4.70	11.55	83.75	79.78	11.55	8.66	15.90	0.00	40.00	17.51	5.66	

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MAINE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans* ***	% Families***	% BANK Loans* ***	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****						
Full Review:																
Portland ME	700	48.31	17.58	6.47	19.29	25.90	25.12	20.58	38.01	47.05	3.84	2.89	4.42	2.23	4.74	
Limited Review:																
Bangor	121	8.35	20.39	10.92	17.26	24.37	23.04	27.73	39.31	36.97	2.15	4.67	1.54	2.87	1.52	
Lewiston	110	7.59	18.49	6.54	18.69	28.04	24.29	27.10	38.53	38.32	3.61	2.35	3.25	2.65	5.36	
Non MSA-ME	518	35.75	18.18	7.83	18.69	18.40	23.35	23.48	39.78	50.29	4.81	4.85	3.39	4.47	5.81	

* 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 1.2% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MAINE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Portland ME	509	44.22	17.58	10.56	19.29	20.52	25.12	24.70	38.01	44.22	12.37	12.41	9.32	11.11	14.66	
Limited Review:																
Bangor	130	11.29	20.39	6.92	17.26	19.23	23.04	23.08	39.31	50.77	11.48	8.82	9.38	11.11	13.02	
Lewiston	77	6.69	18.49	6.94	18.69	12.50	24.29	37.50	38.53	43.06	13.04	11.11	8.57	18.33	11.70	
Non MSA-ME	435	37.79	18.18	12.86	18.69	20.48	23.35	26.43	39.78	40.24	13.77	10.28	17.01	12.89	13.75	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MAINE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****					
Full Review:															
Portland ME	1,864	56.23	17.58	6.17	19.29	16.66	25.12	25.96	38.01	51.22	4.57	4.47	4.52	4.46	4.65
Limited Review:															
Bangor	277	8.36	20.39	3.62	17.26	16.30	23.04	27.90	39.31	52.17	5.10	4.42	5.84	4.46	5.29
Lewiston	216	6.52	18.49	4.72	18.69	17.45	24.29	20.75	38.53	57.08	6.43	8.33	7.69	5.15	6.62
Non MSA-ME	958	28.90	18.18	3.56	18.69	15.06	23.35	25.52	39.78	55.86	6.38	4.63	6.68	6.13	6.57

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: MAINE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Portland ME	3,554	55.28	68.88	65.50	79.09	11.65	9.26	11.37	15.64
Limited Review:									
Bangor	438	6.81	62.27	60.50	77.17	10.73	12.10	4.71	4.41
Lewiston	491	7.64	69.41	57.03	73.73	16.09	10.18	9.60	12.87
Non MSA-ME	1,946	30.27	67.25	64.80	79.75	12.64	7.61	6.53	7.26

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 10.20% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MAINE			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Portland ME	87	22.72	96.71	78.16	97.70	1.15	1.15	38.96	30.43
Limited Review:									
Bangor	17	4.44	96.05	41.18	76.47	11.76	11.76	16.13	7.41
Lewiston	2	0.52	96.61	100.00	100.00	0.00	0.00	0.00	0.00
Non MSA-ME	277	72.32	97.50	73.65	61.73	28.16	10.11	15.90	10.70

* 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 7.83% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MAINE		Evaluation Period: JANUARY 1, 2009 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:									
Portland ME	6	5,972	87	19,556	93	25,528	53.46	5	3,132
Limited Review:									
Bangor	1	506	17	1,006	18	1,512	3.17	0	0
Lewiston	3	308	21	6,002	24	6,310	13.21	2	707
Non MSA-ME	2	415	47	7,103	49	7,518	15.74	4	5,093
Statewide	4	4,833	10	2,051	14	6,884	14.42	1	425

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MAINE Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Portland ME	53.49	27	48.21	3.70	11.11	77.78	7.41	2	0	0	0	2	0	1.33	11.65	73.75	13.26
Limited Review:																	
Bangor	5.58	6	10.71	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	19.01	59.64	21.35
Lewiston	9.10	6	10.71	33.33	0.00	66.67	0.00	0	0	0	0	0	0	6.13	14.25	66.93	12.69
Non MSA-ME	31.83	17	30.36	0.00	11.76	82.35	5.88	2	0	0	0	2	0	0.00	5.37	84.30	10.33

Table 1. Lending Volume

LENDING VOLUME												
Geography: MULTI-ABE - PA-NJ												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010												
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:												
Allentown-Bethlehem PA-NJ	100.00	339	52,307	115	12,280	0	0	3	1,588	454	66,175	100.00

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MULTI-ABE - PA-NJ				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans**					
Full Review:															
Allentown-Bethlehem PA-NJ	106	100.00	1.29	0.00	12.54	20.75	50.89	50.00	35.29	29.25	0.24	0.00	0.08	0.30	0.23

* 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: MULTI-ABE - PA-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Allentown-Bethlehem PA-NJ	65	100.00	1.29	3.08	12.54	6.15	50.89	38.46	35.29	52.31	1.74	5.00	1.27	0.92	3.00									

* 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: MULTI-ABE - PA-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Allentown-Bethlehem PA-NJ	163	100.00	1.29	2.45	12.54	17.79	50.89	34.36	35.29	45.40	0.40	0.00	0.66	0.33	0.45									

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of 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: MULTI-ABE - PA-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Allentown-Bethlehem PA-NJ	5	100.00	7.57	0.00	26.00	20.00	49.86	60.00	16.57	20.00	2.44	0.00	0.00	5.88	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 Multifamily 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: MULTI-ABE - PA-NJ Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Allentown-Bethlehem PA-NJ	115	100.00	3.94	0.87	12.76	10.43	45.83	31.30	37.47	57.39	0.49	0.00	0.45	0.33	0.73

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTI-ABE - PA-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Allentown-Bethlehem PA-NJ	106	100.00	17.81	15.53	18.55	36.89	23.37	14.56	40.27	33.01	0.25	0.00	0.27	0.08	0.45	

* 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.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTI-ABE - PA-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Allentown-Bethlehem PA-NJ	65	100.00	17.81	6.15	18.55	13.85	23.37	29.23	40.27	50.77	1.76	1.67	0.31	1.82	2.50	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MULTI-ABE - PA-NJ					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Allentown-Bethlehem PA-NJ	163	100.00	17.81	5.03	18.55	12.58	23.37	16.98	40.27	65.41	0.45	0.36	0.50	0.31	0.52	

* 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 2.5% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTI-ABE - PA-NJ			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Allentown-Bethlehem PA-NJ	115	100.00	66.19	83.48	79.13	6.96	13.91	0.49	0.99

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.09% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MULTI-ABE - PA-NJ				Evaluation Period: JANUARY 1, 2009 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:									
Allentown-Bethlehem PA-NJ	0	0	52	7,103	52	7,103	100.00	1	2,627

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MULTI-ABE - PA-NJ																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
Allentown-Bethlehem PA-NJ	100.00	7	100.00	0.00	0.00	42.86	57.14	1	0	0	0	0	1	3.88	16.85	48.37	30.90

Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE-DC				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						
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:												
Washington DC	83.16	903	313,271	333	23,472	0	0	6	12,192	1,236	348,935	86.25
Limited Review:												
Bethesda	16.84	213	65,427	76	3,244	0	0	2	2,000	289	70,671	13.75

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MULTISTATE-DC				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****					
Full Review:															
Washington DC	510	82.93	2.46	7.84	15.92	25.10	38.17	46.27	43.45	20.78	0.56	0.84	0.85	0.74	0.27
Limited Review:															
Bethesda	105	17.07	0.38	1.90	14.09	25.71	44.17	59.05	41.36	13.33	0.55	1.56	0.74	0.73	0.17

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE-DC				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:															
Washington DC	53	74.65	2.46	3.77	15.92	20.75	38.17	22.64	43.45	52.83	1.11	1.68	1.38	0.70	1.28
Limited Review:															
Bethesda	18	25.35	0.38	0.00	14.09	11.11	44.17	55.56	41.36	33.33	1.27	0.00	1.04	1.64	1.00

* 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: MULTISTATE-DC					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Washington DC	334	78.77	2.46	5.69	15.92	23.35	38.17	32.34	43.45	38.62	0.24	0.65	0.58	0.27	0.16									
Limited Review:																								
Bethesda	90	21.23	0.38	2.22	14.09	26.67	44.17	44.44	41.36	26.67	0.17	2.27	0.44	0.21	0.08									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MULTISTATE-DC				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:															
Washington DC	6	100.00	12.43	33.33	37.63	50.00	28.49	16.67	21.45	0.00	2.88	4.26	4.00	2.63	0.00
Limited Review:															
Bethesda	0	0.00	1.33	0.00	43.88	0.00	41.97	0.00	12.82	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 Multifamily 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: MULTISTATE-DC Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Washington DC	332	81.37	4.81	1.81	14.52	12.05	34.48	32.23	44.32	53.92	0.31	0.27	0.37	0.29	0.32
Limited Review:															
Bethesda	76	18.63	0.40	1.32	20.50	19.74	40.79	55.26	38.30	23.68	0.22	0.00	0.29	0.26	0.17

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTISTATE-DC					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Washington DC	510	82.93	20.24	13.36	17.13	63.26	21.37	12.18	41.26	11.20	0.62	0.59	1.67	0.26	0.13	
Limited Review:																
Bethesda	105	17.07	17.70	22.86	17.89	59.05	22.34	4.76	42.07	13.33	0.60	1.17	1.42	0.09	0.19	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.2% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTISTATE-DC					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Washington DC	53	74.65	20.24	5.77	17.13	15.38	21.37	30.77	41.26	48.08	1.13	0.00	1.01	1.45	1.28	
Limited Review:																
Bethesda	18	25.35	17.70	5.56	17.89	27.78	22.34	27.78	42.07	38.89	1.36	1.23	1.57	0.73	1.71	

* 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 1.4% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: MULTISTATE-DC					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Washington DC	334	78.77	20.24	7.95	17.13	35.76	21.37	16.89	41.26	39.40	0.27	0.41	0.74	0.17	0.18									
Limited Review:																								
Bethesda	90	21.23	17.70	9.41	17.89	43.53	22.34	16.47	42.07	30.59	0.20	0.30	0.64	0.14	0.09									

* 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 8.7% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATE-DC			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Washington DC	333	81.42	66.85	76.58	85.29	8.11	6.61	0.31	0.80
Limited Review:									
Bethesda	76	18.58	67.13	75.00	92.11	5.26	2.63	0.22	0.58

* 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.

*** 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 4.89% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MULTISTATE-DC									
Evaluation Period: JANUARY 1, 2009 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:									
Washington DC	0	0	129	22,861	129	22,861	87.08	3	1,621
Limited Review:									
Bethesda	0	0	11	3,367	11	3,367	12.83	0	0
Broader/Statewide	0	0	1	24	1	24	0.09	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MULTISTATE-DC Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
Washington DC	86.25	28	84.85	14.29	14.29	35.71	35.71	11	0	4	1	2	4	6.78	23.51	35.07	34.45
Limited Review:																	
Bethesda	13.75	5	15.15	0.00	60.00	40.00	0.00	1	0	0	0	1	0	0.97	23.03	42.00	34.00

Table 1. Lending Volume

LENDING VOLUME												
Geography: DELAWARE												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010												
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:												
Dover	100.00	88	12,845	15	2,209	0	0	1	500	104	15,554	100.00

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2010 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: DELAWARE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****					
Full Review:															
Dover	43	100.00	0.00	0.00	5.30	2.33	82.64	93.02	12.06	4.65	1.13	0.00	1.33	1.17	0.75

* 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 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 IMPROVE															Geography: DELAWARE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Dover	11	100.00	0.00	0.00	5.30	0.00	82.64	90.91	12.06	9.09	1.42	0.00	0.00	1.08	5.56									

* 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: DELAWARE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Dover	34	100.00	0.00	0.00	5.30	11.76	82.64	73.53	12.06	14.71	0.71	0.00	3.57	0.60	0.88									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: DELAWARE Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Dover	15	100.00	0.00	0.00	7.23	6.67	79.04	80.00	13.73	13.33	0.46	0.00	0.00	0.49	0.54

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: DELAWARE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Dover	43	100.00	18.78	4.65	18.66	58.14	23.18	18.60	39.38	18.60	1.23	0.00	3.34	0.36	0.32	

* 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 0.0% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: DELAWARE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Dover	11	100.00	18.78	0.00	18.66	72.73	23.18	9.09	39.38	18.18	1.44	0.00	4.55	1.92	0.00	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: DELAWARE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010										
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:															
Dover	34	100.00	18.78	10.00	18.66	36.67	23.18	13.33	39.38	40.00	0.76	2.97	2.21	0.14	0.43

* 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 11.8% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: DELAWARE			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Dover	15	100.00	65.99	66.67	73.33	6.67	20.00	0.46	0.56

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.67% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: DELAWARE		Evaluation Period: JANUARY 1, 2009 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:									
Dover	22	1,446	16	687	38	2,133	35.23	0	0
Statewide	0	0	5	3,921	5	3,921	64.77	2	1,198

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: DELAWARE																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
Dover	100.00	2	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	8.88	77.69	13.42

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						
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:												
West Palm Beach	38.90	343	89,764	316	19,737	1	25	2	482	662	110,008	54.10
Limited Review:												
Fort Lauderdale	31.57	222	69,149	236	20,116	0	0	0	0	458	89,265	22.91
Miami	29.53	153	57,469	220	21,525	0	0	6	4,529	379	83,523	22.99

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
West Palm Beach	216	45.86	1.53	1.85	24.63	30.56	36.35	35.65	37.50	31.94	0.73	0.93	0.83	0.69	0.72
Limited Review:															
Fort Lauderdale	164	34.82	1.16	1.22	23.67	24.39	45.93	43.29	29.24	31.10	0.60	0.37	0.99	0.58	0.49
Miami	91	19.32	1.69	3.30	19.82	32.97	36.99	28.57	41.51	35.16	0.40	0.39	0.89	0.31	0.30

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010								
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:															
West Palm Beach	21	45.65	1.53	0.00	24.63	19.05	36.35	19.05	37.50	61.90	2.84	0.00	1.25	2.36	3.86
Limited Review:															
Fort Lauderdale	14	30.43	1.16	0.00	23.67	7.14	45.93	57.14	29.24	35.71	1.52	0.00	0.00	2.72	0.98
Miami	11	23.91	1.69	9.09	19.82	9.09	36.99	18.18	41.51	63.64	1.31	0.00	0.00	0.62	2.21

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
West Palm Beach	106	54.64	1.53	0.00	24.63	16.04	36.35	22.64	37.50	61.32	0.47	0.00	0.79	0.38	0.47	
Limited Review:																
Fort Lauderdale	43	22.16	1.16	0.00	23.67	13.95	45.93	41.86	29.24	44.19	0.27	0.00	0.47	0.35	0.20	
Miami	45	23.20	1.69	2.22	19.82	11.11	36.99	37.78	41.51	48.89	0.31	0.00	0.35	0.38	0.27	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:															
West Palm Beach	0	0.00	3.13	0.00	32.78	0.00	31.51	0.00	32.58	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Fort Lauderdale	1	16.67	2.27	0.00	32.48	0.00	48.64	100.00	16.61	0.00	0.00	0.00	0.00	0.00	0.00
Miami	5	83.33	6.85	0.00	35.49	80.00	30.24	0.00	27.42	20.00	3.01	0.00	4.76	0.00	4.17

* 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 Multifamily 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, 2008 TO DECEMBER 31, 2010				
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:																								
West Palm Beach	316	41.15	2.78	2.85	19.29	20.25	34.19	31.33	43.62	45.57	0.69	0.66	0.83	0.65	0.69									
Limited Review:																								
Fort Lauderdale	236	30.73	4.01	5.08	19.65	16.95	41.33	38.56	35.01	39.41	0.32	0.41	0.40	0.30	0.29									
Miami	216	28.13	3.98	3.24	19.56	18.98	32.37	31.48	43.51	46.30	0.24	0.29	0.25	0.24	0.24									

* 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, 2008 TO DECEMBER 31, 2010				
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:																								
West Palm Beach	1	100.00	2.82	0.00	23.02	0.00	34.77	0.00	39.38	100.00	0.99	0.00	0.00	0.00	2.08									
Limited Review:																								
Fort Lauderdale	0	0.00	3.30	0.00	21.23	0.00	42.51	0.00	32.96	0.00	0.00	0.00	0.00	0.00	0.00									
Miami	0	0.00	2.39	0.00	18.13	0.00	35.10	0.00	44.19	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, 2008 TO DECEMBER 31, 2010									
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:																
West Palm Beach	216	45.86	19.86	19.44	18.56	25.46	20.60	12.96	40.98	42.13	0.82	0.41	0.88	0.72	0.92	
Limited Review:																
Fort Lauderdale	164	34.82	20.85	11.59	18.17	47.56	20.48	10.98	40.50	29.88	0.69	0.67	1.45	0.34	0.42	
Miami	91	19.32	23.00	3.30	16.98	17.58	18.53	19.78	41.50	59.34	0.46	0.53	0.55	0.42	0.45	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
West Palm Beach	21	45.65	19.86	4.76	18.56	14.29	20.60	14.29	40.98	66.67	3.02	0.00	3.53	2.33	3.86	
Limited Review:																
Fort Lauderdale	14	30.43	20.85	14.29	18.17	35.71	20.48	14.29	40.50	35.71	1.63	1.47	3.66	0.95	1.15	
Miami	11	23.91	23.00	0.00	16.98	9.09	18.53	9.09	41.50	81.82	1.49	0.00	0.00	0.00	2.55	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families** *	% BANK Loans****						
Full Review:																
West Palm Beach	106	54.36	19.86	6.67	18.56	15.24	20.60	8.57	40.98	69.52	0.56	0.19	0.58	0.34	0.65	
Limited Review:																
Fort Lauderdale	43	22.05	20.85	2.56	18.17	20.51	20.48	25.64	40.50	51.28	0.30	0.18	0.60	0.34	0.24	
Miami	46	23.59	23.00	4.55	16.98	6.82	18.53	6.82	41.50	81.82	0.39	0.32	0.44	0.14	0.44	

* 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 3.6% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
West Palm Beach	316	40.93	70.34	74.68	85.13	9.81	5.06	0.69	2.00
Limited Review:									
Fort Lauderdale	236	30.57	70.49	64.83	84.32	5.51	10.17	0.32	0.77
Miami	220	28.50	69.18	65.91	83.64	6.82	9.55	0.24	0.61

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7.51% 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, 2008 TO DECEMBER 31, 2010				
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:									
West Palm Beach	1	100.00	96.20	100.00	100.00	0.00	0.00	0.99	1.64
Limited Review:									
Fort Lauderdale	0	0.00	97.37	0.00	0.00	0.00	0.00	0.00	0.00
Miami	0	0.00	96.88	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, 2009 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:									
West Palm Beach	1	500	49	11,101	50	11,601	21.44	1	4,080
Limited Review:									
Fort Lauderdale	0	0	51	22,424	51	22,424	41.43	2	8,269
Miami	0	0	44	19,486	44	19,486	36.00	3	14,188
Statewide	1	10	7	601	8	611	1.13	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: FLORIDA Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
West Palm Beach	54.10	21	44.68	4.76	23.81	28.57	42.86	5	1	0	1	0	3	4.21	29.32	33.88	32.37
Limited Review:																	
Fort Lauderdale	22.91	12	25.53	8.33	8.33	58.33	25.00	4	0	0	0	4	0	3.57	26.43	43.13	26.88
Miami	22.99	14	29.79	0.00	14.29	42.86	42.86	4	0	0	1	0	3	4.89	28.61	35.68	30.79

Table 1. Lending Volume

LENDING VOLUME												
Geography: MARYLAND												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010												
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:												
Baltimore	100.00	333	77,546	45	4,918	0	0	1	250	379	82,714	100.00

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2010 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MARYLAND				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
Baltimore	188	100.00	5.61	2.66	19.44	32.45	43.42	46.28	31.54	18.62	0.43	0.19	0.70	0.49	0.24

* 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: MARYLAND				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:															
Baltimore	18	100.00	5.61	22.22	19.44	22.22	43.42	38.89	31.54	16.67	0.56	3.57	1.03	0.33	0.32

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of 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: MARYLAND				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Baltimore	127	100.00	5.61	3.94	19.44	20.47	43.42	48.82	31.54	26.77	0.17	0.43	0.32	0.21	0.09	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: MARYLAND		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																					
Baltimore	45	100.00	5.99	4.44	18.83	11.11	41.99	42.22	33.15	42.22	0.05	0.00	0.06	0.07	0.03						

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MARYLAND					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Baltimore	188	100.00	22.64	15.96	18.76	57.45	22.53	11.17	36.07	15.43	0.48	0.49	0.97	0.29	0.20	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MARYLAND					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Baltimore	18	100.00	22.64	16.67	18.76	8.33	22.53	16.67	36.07	58.33	0.37	0.59	0.19	0.15	0.55	

* 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 33.3% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: MARYLAND					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Baltimore	127	100.00	22.64	7.83	18.76	61.74	22.53	7.83	36.07	22.61	0.20	0.23	0.72	0.05	0.07									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 9.4% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MARYLAND			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Baltimore	45	100.00	65.71	80.00	77.78	6.67	15.56	0.05	0.13

* 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 4.44% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MARYLAND		Evaluation Period: JANUARY 1, 2009 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:									
Baltimore	2	2,709	18	3,398	20	6,107	97.71	2	730
Statewide	0	0	2	143	2	143	2.29	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MARYLAND																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
Baltimore	100.00	5	100.00	0.00	0.00	40.00	60.00	4	0	0	0	1	3	10.78	23.80	39.78	25.16

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						
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:												
Manchester	55.84	1,339	214,115	2,311	228,381	28	1,803	10	173,936	3,678	444,299	46.26
Limited Review:												
Non MSA-NH	44.16	1,986	262,476	2,170	210,735	44	2,270	14	13,370	4,200	488,851	53.74

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2010 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Manchester	295	38.11	0.73	1.02	8.76	14.24	56.63	57.63	33.88	27.12	1.77	4.35	2.47	1.81	1.42	
Limited Review:																
Non MSA-NH	479	61.89	0.00	0.00	5.17	2.71	82.41	88.10	12.42	9.19	2.62	0.00	0.53	2.76	2.41	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:															
Manchester	313	37.94	0.73	0.32	8.76	8.95	56.63	65.18	33.88	25.56	24.49	50.00	26.67	24.83	22.93
Limited Review:															
Non MSA-NH	512	62.06	0.00	0.00	5.17	1.56	82.41	90.63	12.42	7.81	23.25	0.00	7.14	24.92	19.54

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****					
Full Review:															
Manchester	718	42.21	0.73	0.28	8.76	5.85	56.63	59.05	33.88	34.82	2.12	2.50	2.06	2.31	1.91
Limited Review:															
Non MSA-NH	983	57.79	0.00	0.00	5.17	2.75	82.41	85.35	12.42	11.90	3.45	0.00	3.64	3.72	2.33

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
Manchester	13	52.00	5.97	7.69	38.60	30.77	47.98	53.85	7.45	7.69	13.73	14.29	11.54	16.67	0.00
Limited Review:															
Non MSA-NH	12	48.00	0.00	0.00	14.31	0.00	76.56	100.00	9.13	0.00	8.82	0.00	0.00	10.71	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 Multifamily 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: NEW HAMPSHIRE Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Manchester	2,311	51.57	1.92	2.81	17.70	15.27	51.63	51.62	28.75	30.29	11.41	13.27	10.03	12.35	11.23
Limited Review:															
Non MSA-NH	2,170	48.43	0.00	0.00	6.92	3.13	79.61	82.58	13.47	14.29	9.77	0.00	3.64	10.79	11.46

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

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans					
Full Review:															
Manchester	28	38.89	0.55	0.00	6.84	0.00	61.08	75.00	31.53	25.00	34.38	0.00	0.00	40.91	22.22
Limited Review:															
Non MSA-NH	44	61.11	0.00	0.00	3.53	0.00	85.44	90.91	11.03	9.09	23.53	0.00	0.00	25.00	22.22

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEW HAMPSHIRE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Manchester	295	38.11	16.82	6.44	18.82	23.73	26.62	29.49	37.74	40.34	2.09	1.32	1.33	2.10	3.18	
Limited Review:																
Non MSA-NH	479	61.89	16.00	9.11	19.42	22.46	25.99	23.31	38.59	45.13	3.02	4.72	2.25	2.65	3.41	

* 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 0.9% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: NEW HAMPSHIRE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Manchester	313	37.94	16.82	12.90	18.82	22.90	26.62	30.32	37.74	33.87	25.86	22.45	27.52	23.33	27.42	
Limited Review:																
Non MSA-NH	512	62.06	16.00	15.35	19.42	25.98	25.99	29.92	38.59	28.74	23.49	47.69	33.33	21.64	15.41	

* 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 0.8% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: NEW HAMPSHIRE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Manchester	718	42.21	16.82	8.81	18.82	19.02	26.62	27.27	37.74	44.90	2.68	4.17	2.02	2.23	3.04									
Limited Review:																								
Non MSA-NH	983	57.79	16.00	5.50	19.42	19.98	25.99	27.01	38.59	47.50	4.21	3.90	4.76	4.47	3.97									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEW HAMPSHIRE			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Manchester	2,311	51.57	68.55	61.88	78.19	13.50	8.31	11.41	17.59
Limited Review:									
Non MSA-NH	2,170	48.43	70.05	63.87	79.45	11.47	9.08	9.77	14.97

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.65% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NEW HAMPSHIRE			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Manchester	28	38.89	96.91	60.71	85.71	14.29	0.00	34.38	30.00
Limited Review:									
Non MSA-NH	44	61.11	97.54	59.09	97.73	0.00	2.27	23.53	9.52

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

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 20.83% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 2009 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:									
Manchester	1	34	93	14,995	94	15,029	36.76	3	2,542
Limited Review:									
Non MSA-NH	2	2,005	84	17,910	86	19,915	48.72	5	5,009
Statewide	3	3,439	10	2,495	13	5,934	14.52	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: NEW HAMPSHIRE																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
Manchester	46.26	24	48.00	0.00	16.67	66.67	16.67	0	0	0	0	0	0	2.68	17.41	52.62	27.29
Limited Review:																	
Non MSA-NH	53.74	26	52.00	0.00	11.54	80.77	7.69	0	1	0	0	-1	0	0.00	6.14	80.99	12.87

Table 1. Lending Volume

LENDING VOLUME												
Geography: NEW JERSEY												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010												
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:												
Atlantic City	28.44	620	84,189	208	14,518	0	0	0	0	828	98,707	38.70
Limited Review:												
Ocean City	33.26	421	107,499	96	7,937	0	0	0	0	517	115,436	13.12
Trenton	28.61	326	70,331	240	20,274	0	0	9	7,695	575	99,300	37.00
Vineland	9.69	198	19,426	138	11,231	6	994	2	2,000	344	33,651	11.19

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEW JERSEY				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
Atlantic City	112	26.86	0.98	0.89	9.67	11.61	66.10	66.07	23.26	21.43	1.80	4.76	2.47	1.82	1.47
Limited Review:															
Ocean City	134	32.13	0.00	0.00	21.44	20.90	50.49	44.78	28.06	34.33	2.61	0.00	4.06	2.35	2.24
Trenton	128	30.70	6.07	12.50	12.82	8.59	38.98	39.84	42.12	39.06	1.85	5.11	1.82	1.54	1.68
Vineland	43	10.31	1.56	0.00	10.01	20.93	59.09	53.49	29.35	25.58	0.80	0.00	1.35	1.10	0.19

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEW JERSEY				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:															
Atlantic City	200	50.76	0.98	0.00	9.67	4.00	66.10	68.00	23.26	28.00	17.56	0.00	6.67	18.15	17.69
Limited Review:															
Ocean City	82	20.81	0.00	0.00	21.44	12.20	50.49	48.78	28.06	39.02	11.66	0.00	8.20	11.32	13.82
Trenton	46	11.68	6.07	4.35	12.82	8.70	38.98	30.43	42.12	56.52	3.77	5.00	2.04	2.91	4.76
Vineland	66	16.75	1.56	0.00	10.01	4.55	59.09	63.64	29.35	31.82	8.27	0.00	0.00	9.09	9.38

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: NEW JERSEY		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																					
Atlantic City	308	40.85	0.98	1.30	9.67	3.90	66.10	63.64	23.26	31.17	2.30	10.53	2.42	2.34	2.07						
Limited Review:																					
Ocean City	205	27.19	0.00	0.00	21.44	10.73	50.49	50.24	28.06	39.02	1.83	0.00	1.69	1.70	2.00						
Trenton	152	20.16	6.07	3.29	12.82	7.24	38.98	29.61	42.12	59.87	1.05	3.33	1.78	0.75	1.09						
Vineland	89	11.80	1.56	0.00	10.01	5.62	59.09	62.92	29.35	31.46	1.56	0.00	2.24	1.89	0.98						

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: NEW JERSEY Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Atlantic City	208	30.50	5.21	2.88	12.52	7.69	59.81	69.23	22.45	20.19	3.00	3.37	3.08	3.16	2.89
Limited Review:															
Ocean City	96	14.08	0.00	0.00	19.68	6.25	54.95	48.96	25.37	44.79	2.06	0.00	0.90	1.68	4.06
Trenton	240	35.19	10.69	9.58	10.70	7.92	32.32	33.33	46.30	49.17	1.88	2.55	2.93	1.79	1.80
Vineland	138	20.23	7.67	2.17	16.15	10.87	48.47	66.67	27.71	20.29	3.73	0.00	4.23	5.64	2.20

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

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: NEW JERSEY				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
Atlantic City	0	0.00	0.33	0.00	3.75	0.00	77.16	0.00	18.76	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Ocean City	0	0.00	0.00	0.00	18.04	0.00	56.01	0.00	25.95	0.00	0.00	0.00	0.00	0.00	0.00
Trenton	0	0.00	3.01	0.00	9.03	0.00	33.61	0.00	54.35	0.00	0.00	0.00	0.00	0.00	0.00
Vineland	6	100.00	0.29	0.00	4.06	0.00	50.43	33.33	45.22	66.67	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: NEW JERSEY					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Atlantic City	112	26.86	19.29	8.93	18.27	38.39	23.34	11.61	39.11	41.07	2.03	3.67	4.06	0.39	1.64	
Limited Review:																
Ocean City	134	32.13	18.91	1.50	18.76	8.27	21.69	10.53	40.65	79.70	2.86	3.70	3.38	1.83	2.95	
Trenton	128	30.70	20.71	7.03	17.30	41.41	21.40	20.31	40.58	31.25	2.13	0.83	3.51	1.78	1.78	
Vineland	43	10.31	21.78	2.33	17.56	39.53	20.35	23.26	40.31	34.88	0.96	0.00	1.42	0.66	1.05	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.2% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: NEW JERSEY					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010								
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:															
Atlantic City	200	50.76	19.29	9.09	18.27	18.18	23.34	25.76	39.11	46.97	18.05	24.14	16.67	18.35	17.53
Limited Review:															
Ocean City	82	20.81	18.91	4.88	18.76	13.41	21.69	21.95	40.65	59.76	12.01	8.33	12.00	10.81	12.97
Trenton	46	11.68	20.71	6.52	17.30	23.91	21.40	13.04	40.58	56.52	3.85	1.67	4.76	1.92	5.23
Vineland	66	16.75	21.78	16.92	17.56	20.00	20.35	27.69	40.31	35.38	8.18	12.50	6.98	7.25	8.51

* 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 0.8% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEW JERSEY					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****						
Full Review:																
Atlantic City	308	40.85	19.29	6.25	18.27	18.42	23.34	25.66	39.11	49.67	2.74	4.85	3.78	2.78	2.22	
Limited Review:																
Ocean City	205	27.19	18.91	1.97	18.76	12.32	21.69	11.33	40.65	74.38	2.05	2.63	3.36	1.46	1.99	
Trenton	152	20.16	20.71	5.44	17.30	19.05	21.40	21.09	40.58	54.42	1.21	0.72	1.65	0.67	1.37	
Vineland	89	11.80	21.78	1.12	17.56	21.35	20.35	21.35	40.31	56.18	1.97	0.00	2.61	1.42	2.19	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEW JERSEY			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Atlantic City	208	30.50	66.95	72.60	84.13	9.62	6.25	3.00	6.91
Limited Review:									
Ocean City	96	14.08	67.33	71.88	79.17	10.42	10.42	2.06	3.88
Trenton	240	35.19	65.33	67.08	77.92	12.50	9.58	1.88	4.82
Vineland	138	20.23	65.50	60.14	86.23	7.97	5.80	3.73	7.42

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7.62% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NEW JERSEY			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Atlantic City	0	0.00	95.76	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Ocean City	0	0.00	96.20	0.00	0.00	0.00	0.00	0.00	0.00
Trenton	0	0.00	95.65	0.00	0.00	0.00	0.00	0.00	0.00
Vineland	6	100.00	95.36	50.00	33.33	33.33	33.33	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: NEW JERSEY				Evaluation Period: JANUARY 1, 2009 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:									
Atlantic City	0	0	40	11,481	40	11,481	34.26	2	154
Limited Review:									
Ocean City	0	0	16	1,353	16	1,353	4.04	0	0
Trenton	1	93	52	5,496	53	5,589	16.68	2	166
Vineland	1	1,395	27	1,926	28	3,321	9.91	0	0
Statewide	3	4,653	13	7,111	16	11,764	35.11	2	1,746

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: NEW JERSEY Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
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:																	
Atlantic City	38.70	8	32.00	12.50	0.00	62.50	25.00	0	0	0	0	0	0	4.31	16.09	61.29	17.52
Limited Review:																	
Ocean City	13.12	4	16.00	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	23.79	51.50	24.71
Trenton	37.00	8	32.00	12.50	0.00	37.50	50.00	0	0	0	0	0	0	11.94	14.87	35.29	37.37
Vineland	11.19	5	20.00	0.00	40.00	40.00	20.00	0	2	0	0	-1	-1	5.07	17.50	54.11	23.32

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						
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:												
Poughkeepsie	27.39	405	79,054	395	40,842	2	253	5	21,850	802	141,999	37.93
Limited Review:												
	27.88	530	79,083	464	58,419	10	1,133	9	5,910	1,004	144,545	18.56
Glen Falls	27.03	686	71,692	707	67,514	17	800	5	95	1,410	140,101	24.95
Kingston	0.97	15	3,177	20	1,862	1	10	0	0	36	5,049	4.20
Non MSA-NY	16.73	428	39,275	329	31,075	7	363	3	16,050	764	86,763	14.36

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2011.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Poughkeepsie	112	20.18	2.07	9.82	8.38	29.46	66.59	43.75	22.96	16.96	0.96	2.13	3.52	0.62	0.63	
Limited Review:																
Albany	212	38.20	2.18	5.19	9.28	11.32	51.92	45.28	36.62	38.21	1.32	1.65	1.89	1.31	1.19	
Glen Falls	132	23.78	0.00	0.00	7.87	9.85	76.58	76.52	15.56	13.64	3.91	0.00	2.48	4.31	3.15	
Kingston	9	1.62	0.00	0.00	15.19	11.11	72.96	77.78	11.85	11.11	0.68	0.00	1.06	0.65	0.00	
Non MSA-NY	90	16.22	0.00	0.00	5.17	4.44	60.16	68.89	34.67	26.67	1.66	0.00	0.00	1.73	1.78	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Poughkeepsie	90	16.82	2.07	2.22	8.38	7.78	66.59	63.33	22.96	26.67	5.45	0.00	3.92	5.44	6.45	
Limited Review:																
Albany	90	16.82	2.18	7.78	9.28	30.00	51.92	52.22	36.62	10.00	3.41	31.25	9.00	3.00	1.14	
Glen Falls	204	38.13	0.00	0.00	7.87	11.27	76.58	77.94	15.56	10.78	21.36	0.00	20.00	22.09	18.37	
Kingston	0	0.00	0.00	0.00	15.19	0.00	72.96	0.00	11.85	0.00	0.00	0.00	0.00	0.00	0.00	
Non MSA-NY	151	28.22	0.00	0.00	5.17	3.31	60.16	84.11	34.67	12.58	14.33	0.00	33.33	17.43	6.72	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: NEW YORK		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																					
Poughkeepsie	199	20.62	2.07	1.01	8.38	9.05	66.59	62.81	22.96	27.14	1.13	0.00	2.56	1.13	0.89						
Limited Review:																					
Albany	226	23.42	2.18	1.33	9.28	23.01	51.92	49.56	36.62	26.11	0.72	0.80	3.14	0.69	0.48						
Glen Falls	350	36.27	0.00	0.00	7.87	7.14	76.58	77.14	15.56	15.71	7.87	0.00	7.50	8.50	5.59						
Kingston	6	0.62	0.00	0.00	15.19	33.33	72.96	50.00	11.85	16.67	0.50	0.00	3.28	0.00	1.05						
Non MSA-NY	184	19.07	0.00	0.00	5.17	3.26	60.16	72.83	34.67	23.91	3.13	0.00	1.33	4.15	2.04						

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Poughkeepsie	4	44.44	15.63	0.00	20.85	25.00	59.37	75.00	4.16	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Albany	2	22.22	15.57	0.00	12.41	0.00	47.87	100.00	24.14	0.00	0.00	0.00	0.00	0.00	0.00	
Glen Falls	0	0.00	0.00	0.00	29.96	0.00	38.04	0.00	32.00	0.00	0.00	0.00	0.00	0.00	0.00	
Kingston	0	0.00	0.00	0.00	43.40	0.00	55.25	0.00	1.35	0.00	0.00	0.00	0.00	0.00	0.00	
Non MSA-NY	3	33.33	0.00	0.00	15.64	0.00	72.12	100.00	12.24	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 Multifamily 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: NEW YORK Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Poughkeepsie	395	20.63	7.60	6.58	10.86	10.89	61.92	61.77	19.61	20.76	1.56	1.21	2.19	1.65	1.53
Limited Review:															
Albany	464	24.23	9.48	6.03	9.45	25.22	47.99	42.46	33.09	26.29	1.57	1.37	3.45	1.22	1.64
Glen Falls	707	36.92	0.00	0.00	11.84	12.31	68.01	67.61	20.15	20.08	11.78	0.00	13.02	12.51	10.99
Kingston	20	1.04	0.00	0.00	16.91	0.00	75.80	90.00	7.29	10.00	0.84	0.00	0.00	0.99	0.91
Non MSA-NY	329	17.18	0.00	0.00	8.49	7.29	59.61	66.26	31.74	26.44	3.81	0.00	4.11	4.96	2.90

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

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Poughkeepsie	2	5.41	0.82	0.00	7.34	0.00	65.42	100.00	26.43	0.00	2.90	0.00	0.00	6.06	0.00									
Limited Review:																								
Albany	10	27.03	1.15	0.00	6.91	70.00	58.64	10.00	33.30	20.00	5.77	0.00	20.00	6.45	0.00									
Glen Falls	17	45.95	0.00	0.00	2.47	5.88	89.40	82.35	8.13	11.76	10.81	0.00	0.00	11.11	0.00									
Kingston	1	2.70	0.00	0.00	12.23	0.00	76.26	100.00	11.51	0.00	4.55	0.00	0.00	6.67	0.00									
Non MSA-NY	7	18.92	0.00	0.00	2.08	0.00	65.66	100.00	32.26	0.00	4.84	0.00	0.00	5.88	0.00									

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Poughkeepsie	112	20.18	19.14	5.36	18.04	29.46	24.40	25.00	38.41	40.18	1.02	1.52	1.34	0.70	1.01	
Limited Review:																
Albany	212	38.20	17.10	10.38	17.83	28.30	22.55	19.81	42.52	41.51	1.40	2.60	2.00	0.85	1.18	
Glen Falls	132	23.78	17.50	6.11	19.41	21.37	24.45	29.01	38.65	43.51	4.18	5.45	3.26	2.56	5.78	
Kingston	9	1.62	21.64	0.00	19.56	22.22	23.04	33.33	35.76	44.44	0.71	0.00	1.79	0.00	0.69	
Non MSA-NY	90	16.22	17.27	2.22	16.44	21.11	21.10	23.33	45.19	53.33	1.79	3.13	2.28	1.34	1.79	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.2% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:																
Poughkeepsie	90	16.82	19.14	13.33	18.04	17.78	24.40	25.56	38.41	43.33	5.62	8.47	5.69	4.03	5.88	
Limited Review:																
Albany	90	16.82	17.10	12.36	17.83	25.84	22.55	25.84	42.52	35.96	3.39	0.99	5.53	3.63	2.77	
Glen Falls	204	38.13	17.50	8.42	19.41	23.76	24.45	29.70	38.65	38.12	21.69	25.81	17.74	23.17	21.66	
Kingston	0	0.00	21.64	0.00	19.56	0.00	23.04	0.00	35.76	0.00	0.00	0.00	0.00	0.00	0.00	
Non MSA-NY	151	28.22	17.27	9.40	16.44	13.42	21.10	24.16	45.19	53.02	14.93	16.67	7.69	13.58	17.42	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****						
Full Review:																
Poughkeepsie	199	20.62	19.14	5.10	18.04	23.98	24.40	28.57	38.41	42.35	1.19	1.57	2.22	0.77	1.03	
Limited Review:																
Albany	226	23.42	17.10	7.56	17.83	25.33	22.55	26.22	42.52	40.89	0.78	1.35	1.30	0.67	0.60	
Glen Falls	350	36.27	17.50	6.94	19.41	18.21	24.45	28.61	38.65	46.24	8.41	11.29	11.63	8.27	7.30	
Kingston	6	0.62	21.64	16.67	19.56	0.00	23.04	0.00	35.76	83.33	0.58	0.00	0.00	0.00	1.27	
Non MSA-NY	184	19.07	17.27	2.73	16.44	12.02	21.10	32.24	45.19	53.01	3.47	4.44	3.80	5.15	2.80	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Poughkeepsie	395	20.63	68.85	66.08	82.03	9.11	8.86	1.56	3.18
Limited Review:									
Albany	464	24.23	65.94	57.76	75.65	11.42	12.93	1.57	2.81
Glen Falls	707	36.92	69.95	59.97	79.49	12.87	7.64	11.78	14.53
Kingston	20	1.04	67.34	45.00	95.00	0.00	5.00	0.84	1.75
Non MSA-NY	329	17.18	65.57	58.66	80.85	10.03	9.12	3.81	4.94

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.75% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NEW YORK			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Poughkeepsie	2	5.41	96.52	50.00	50.00	50.00	0.00	2.90	3.23
Limited Review:									
Albany	10	27.03	97.34	70.00	70.00	20.00	10.00	5.77	2.94
Glen Falls	17	45.95	98.06	70.59	94.12	5.88	0.00	10.81	0.00
Kingston	1	2.70	98.56	100.00	100.00	0.00	0.00	4.55	9.09
Non MSA-NY	7	18.92	97.50	71.43	100.00	0.00	0.00	4.84	2.56

* 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 16.22% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW YORK		Evaluation Period: JANUARY 1, 2009 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:									
Poughkeepsie	1	746	52	18,058	53	18,804	18.07	3	1,329
Limited Review:									
Albany	3	874	49	11,899	52	12,773	12.28	4	14,059
Glen Falls	2	1,213	27	4,181	29	5,394	5.18	1	85
Kingston	0	0	13	4,629	13	4,629	4.45	1	8,442
Non MSA-NY	1	75	31	7,177	32	7,252	6.97	3	3,400
Statewide	3	3,817	6	51,373	9	55,190	53.05	1	6,540

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
Geography: NEW YORK																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Poughkeepsie	37.93	18	36.00	11.11	16.67	66.67	5.56	0	2	0	-1	-1	0	7.18	11.97	62.07	18.75
Limited Review:																	
Albany	18.56	10	20.00	10.00	30.00	30.00	30.00	0	0	0	0	0	0	6.16	11.69	50.29	31.81
Glen Falls	24.95	12	24.00	0.00	16.67	66.67	16.67	0	0	0	0	0	0	0.00	10.39	74.77	14.84
Kingston	4.20	2	4.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	21.73	69.91	8.36
Non MSA-NY	14.36	8	16.00	0.00	0.00	87.50	12.50	0	0	0	0	0	0	0.00	7.67	61.15	30.10

Table 1. Lending Volume

LENDING VOLUME												Geography: VERMONT		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010	
Assessment Area (2010):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
Full Review:															
Burlington	52.93	905	184,780	1,036	136,882	33	1,409	38	124,363	2,012	447,434	39.05			
Limited Review:															
Non MSA-VT	47.07	1,321	199,972	1,461	167,989	39	1,599	14	28,316	2,835	397,876	60.95			

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2010 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: VERMONT				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Burlington	221	42.50	0.38	0.45	11.02	16.74	58.88	52.04	29.72	30.77	2.14	0.00	3.61	2.25	1.66	
Limited Review:																
Non MSA-VT	299	57.50	0.00	0.00	8.97	9.70	75.41	71.57	15.62	18.73	2.91	0.00	2.91	3.07	2.31	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: VERMONT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:																								
Burlington	170	34.62	0.38	0.00	11.02	21.76	58.88	50.59	29.72	27.65	6.84	0.00	11.39	4.98	9.40									
Limited Review:																								
Non MSA-VT	321	65.38	0.00	0.00	8.97	11.84	75.41	73.83	15.62	14.33	7.73	0.00	11.39	8.24	4.15									

* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: VERMONT				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****					
Full Review:															
Burlington	492	41.69	0.38	0.41	11.02	17.89	58.88	53.25	29.72	28.46	2.06	3.23	5.49	1.94	1.58
Limited Review:															
Non MSA-VT	688	58.31	0.00	0.00	8.97	7.41	75.41	75.29	15.62	17.30	3.03	0.00	3.79	3.16	2.41

* 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: VERMONT				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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:															
Burlington	22	62.86	6.01	0.00	22.15	27.27	53.50	50.00	18.33	22.73	17.65	0.00	22.22	10.53	40.00
Limited Review:															
Non MSA-VT	13	37.14	0.00	0.00	12.84	30.77	61.15	69.23	26.01	0.00	2.86	0.00	0.00	4.35	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 Multifamily 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: VERMONT Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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:															
Burlington	1,036	41.49	1.46	0.19	16.50	20.17	52.79	44.02	29.25	35.62	7.93	0.00	10.59	7.17	8.72
Limited Review:															
Non MSA-VT	1,461	58.51	0.00	0.00	10.86	11.70	70.19	67.42	18.95	20.88	6.40	0.00	7.60	6.72	6.99

* 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: VERMONT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Burlington	33	45.83	0.78	0.00	13.25	9.09	60.69	69.70	25.28	21.21	18.18	0.00	11.11	20.83	22.22	
Limited Review:																
Non MSA-VT	39	54.17	0.00	0.00	9.53	5.13	76.27	84.62	14.20	10.26	12.84	0.00	0.00	16.00	15.38	

* 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: VERMONT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					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:																
Burlington	221	42.50	17.48	7.55	19.50	31.13	24.68	18.40	38.34	42.92	2.43	2.33	3.90	1.29	2.31	
Limited Review:																
Non MSA-VT	299	57.50	18.20	6.48	19.25	17.06	24.32	18.77	38.23	57.68	3.22	3.20	3.67	1.61	3.89	

* 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 2.9% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: VERMONT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Burlington	170	34.62	17.48	16.35	19.50	23.27	24.68	27.04	38.34	33.33	6.53	8.33	6.47	6.25	6.44	
Limited Review:																
Non MSA-VT	321	65.38	18.20	7.86	19.25	19.81	24.32	30.82	38.23	41.51	7.83	6.74	7.77	8.00	7.95	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: VERMONT					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families** *	% BANK Loans****						
Full Review:																
Burlington	492	41.69	17.48	8.85	19.50	19.75	24.68	24.28	38.34	47.12	2.37	3.05	3.01	1.80	2.37	
Limited Review:																
Non MSA-VT	688	58.31	18.20	5.81	19.25	14.68	24.32	23.11	38.23	56.40	3.45	2.94	3.26	3.34	3.60	

* Based on 2010 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: VERMONT			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Burlington	1,036	41.49	67.84	60.81	74.23	11.78	14.00	7.93	14.08
Limited Review:									
Non MSA-VT	1,461	58.51	68.97	64.20	75.36	11.02	13.62	6.40	8.84

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7.93% 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: VERMONT			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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:									
Burlington	33	45.83	98.00	87.88	96.97	3.03	0.00	18.18	16.67
Limited Review:									
Non MSA-VT	39	54.17	98.12	69.23	94.87	5.13	0.00	12.84	10.77

* 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 12.50% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: VERMONT			Evaluation Period: JANUARY 1, 2009 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:									
Burlington	3	1,755	69	50,657	72	52,412	68.63	3	5,603
Limited Review:									
Non MSA-VT	3	2,218	82	17,771	85	19,989	26.17	4	4,247
Statewide	2	3,245	9	728	11	3,973	5.20	1	21

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: VERMONT Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Burlington	39.05	14	35.00	0.00	35.71	35.71	28.57	0	0	0	0	0	0	1.51	13.36	58.93	26.21
Limited Review:																	
Non MSA-VT	60.95	26	65.00	0.00	19.23	46.15	34.62	0	1	0	0	-1	0	0.00	10.80	74.73	14.47

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: REGIONAL		Evaluation Period: JANUARY 1, 2009 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:									
Limited Review:									
Regional	29	27,583	16	12,791	45	40,374	100.00	34	209,827

* '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.