

# **PUBLIC DISCLOSURE**

September 29, 2014

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Manufacturers and Traders Trust Company  
RSSD No. 501105

One M&T Plaza  
Buffalo, New York 14203

Federal Reserve Bank of New York  
33 Liberty Street  
New York, New York 10045

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it 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.

## TABLE OF CONTENTS

I.	Institution Rating	
a.	Overall Rating.....	1
b.	Performance Test Ratings Table.....	1
c.	Summary of Major Factors Supporting Rating.....	1
II.	Institution	
a.	Description of Institution .....	2
b.	Scope of Examination .....	7
c.	Conclusions with Respect to Performance Tests .....	11
III.	Multistate Metropolitan Area	
	MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)	
a.	Multistate Metropolitan Area Rating (Full Scope Review) .....	20
b.	Scope of Examination .....	20
c.	Description of Institution’s Operations.....	21
d.	Conclusions with Respect to Performance Tests .....	24
	MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA)	
a.	Multistate Metropolitan Area Rating (Full Scope Review) .....	34
b.	Scope of Examination .....	34
c.	Description of Institution’s Operations.....	34
d.	Conclusions with Respect to Performance Tests .....	39
	MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	
a.	Multistate Metropolitan Area Rating (Full Scope Review) .....	48
b.	Scope of Examination .....	48
c.	Description of Institution’s Operations.....	49
d.	Conclusions with Respect to Performance Tests .....	53
	MSA 19060 (Cumberland, MD-WV)	
a.	Multistate Metropolitan Area Rating (Full Scope Review) .....	62
b.	Scope of Examination .....	62
c.	Description of Institution’s Operations.....	62
d.	Conclusions with Respect to Performance Tests .....	65
IV.	State	
	State of New York	
a.	Summary	
i.	State Rating.....	72
ii.	Scope of Examination .....	72
iii.	Description of Institution’s Operations.....	73
iv.	Conclusions with Respect to Performance Tests.....	73

MSA 15380 (Buffalo-Niagara Falls, NY)	
b.	Metropolitan Area (Full Scope Review)
i.	Description of Institution’s Operations.....78
ii.	Conclusions with Respect to Performance Tests.....81
MSA 40380 (Rochester, NY)	
c.	Metropolitan Area (Full Scope Review)
i.	Description of Institution’s Operations.....91
ii.	Conclusions with Respect to Performance Tests.....94
MSA 45060 (Syracuse, NY)	
d.	Metropolitan Area (Full Scope Review)
i.	Description of Institution’s Operations.....103
ii.	Conclusions with Respect to Performance Tests.....107
MSA 13780 (Binghamton, NY)	
e.	Metropolitan Area (Full Scope Review)
i.	Description of Institution’s Operations.....115
ii.	Conclusions with Respect to Performance Tests.....117
f.	New York State Limited Scope Reviews.....126
State of Maryland	
g.	Summary
i.	State Rating .....138
ii.	Scope of Examination .....138
iii.	Description of Institution’s Operations.....139
iv.	Conclusions with Respect to Performance Tests.....139
MSA 12580 (Baltimore-Towson, MD)	
h.	Metropolitan Area (Full Scope Review)
i.	Description of Institution’s Operations.....142
ii.	Conclusions with Respect to Performance Tests.....146
i.	State of Maryland Limited Scope Reviews .....155

State of Pennsylvania	
j.	Summary
	i. State Rating.....166
	ii. Scope of Examination.....166
	iii. Description of Institution’s Operations.....167
	iv. Conclusions with Respect to Performance Tests.....167
MSA 49620 (York-Hanover, PA)	
k.	Metropolitan Area (Full Scope Review)
	i. Description of Institution’s Operations.....172
	ii. Conclusions with Respect to Performance Tests.....175
MSA 25420 (Harrisburg-Carlisle, PA)	
l.	Metropolitan Area (Full Scope Review)
	i. Description of Institution’s Operations.....184
	ii. Conclusions with Respect to Performance Tests.....187
MSA 42540 (Scranton—Wilkes-Barre, PA)	
m.	Metropolitan Area (Full Scope Review)
	i. Description of Institution’s Operations.....195
	ii. Conclusions with Respect to Performance Tests.....198
PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan and Union Counties)	
n.	Nonmetropolitan Statewide Area (Full Scope Review)
	i. Description of Institution’s Operations.....207
	ii. Conclusions with Respect to Performance Tests.....210
MSA 11020 (Altoona, PA)	
o.	Metropolitan Area (Full Scope Review)
	i. Description of Institution’s Operations.....218
	ii. Conclusions with Respect to Performance Tests.....221
p.	State of Pennsylvania Limited Scope Reviews.....228

State of Delaware	
q.	Summary
	i. State Rating.....243
	ii. Scope of Examination.....243
	iii. Description of Institution’s Operations.....244
	iv. Conclusions with Respect to Performance Tests.....244
DE Nonmetropolitan area (Sussex County)	
r.	Nonmetropolitan Statewide Area (Full Scope Review)
	i. Description of Institution’s Operations.....245
	ii. Conclusions with Respect to Performance Tests.....247
s.	Delaware Limited Scope Review.....254
State of Virginia	
t.	Summary
	i. State Rating.....255
	ii. Scope of Examination.....255
	iii. Description of Institution’s Operations.....256
	iv. Conclusions with Respect to Performance Tests.....256
MSA 40060 (Richmond, VA)	
u.	Metropolitan Area (Full Scope Review)
	i. Description of Institution’s Operations.....256
	ii. Conclusions with Respect to Performance Tests.....260
State of Florida	
v.	Summary
	i. State Rating.....267
	ii. Scope of Examination.....267
	iii. Description of Institution’s Operations.....267
	iv. Conclusions with Respect to Performance Tests.....268
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	
w.	Metropolitan Area (Full Scope Review)
	i. Description of Institution’s Operations.....268
	ii. Conclusions with Respect to Performance Tests.....270

State of Massachusetts

x.	Summary	
	i.	State Rating.....274
	ii.	Scope of Examination.....274
	iii.	Description of Institution’s Operations.....274
	iv.	Conclusions with Respect to Performance Tests.....275

MD 14484 (Boston-Quincy, MA)

y.	Metropolitan Area (Full Scope Review)	
	i.	Description of Institution’s Operations.....275
	ii.	Conclusions with Respect to Performance Tests.....278

State of Connecticut

z.	Summary	
	i.	State Rating.....282
	ii.	Scope of Examination.....282
	iii.	Description of Institution’s Operations.....282
	iv.	Conclusions with Respect to Performance Tests.....282

MSA 14860 (Bridgeport-Stamford-Norwalk, CT)

aa.	Metropolitan Area (Full Scope Review)	
	i.	Description of Institution’s Operations.....283
	ii.	Conclusions with Respect to Performance Tests.....285

V. Exhibits

a.	Exhibit I: Summary of Key Assessment Area Data.....	10
b.	Exhibit II: Summary of Lending Activity.....	12
c.	Exhibit III: Originations and Purchases Inside and Outside the Assessment Area .....	12
d.	Exhibit IV: Summary of Key Assessment area Data: New York State.....	77
e.	Exhibit V: Summary of Key Assessment Area Data: State of Maryland.....	141
f.	Exhibit VI: Summary of Key Assessment Area Data: State of Pennsylvania.....	168

VI.	Appendix	
a.	CRA Appendix A: Scope of Examination Table .....	290
b.	CRA Appendix B: Summary of State and Multistate Metropolitan Area Ratings .....	293
c.	CRA Appendix C: Glossary.....	294
d.	CRA Appendix D: Summary of Branch Locations .....	297
e.	CRA Appendix E: Summary of Community Development Lending.....	298
f.	CRA Appendix F: Summary Qualified Investments .....	299
g.	CRA Appendix G: Aggregate Loan Distribution Tables 2013.....	300
h.	CRA Appendix H: Aggregate Loan Distribution Tables 2013.....	345

## INSTITUTION'S CRA RATING

***INSTITUTION'S CRA RATING: OUTSTANDING***

The following table indicates the performance level of Manufacturers and Traders Trust Company with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	<u>MANUFACTURERS AND TRADERS TRUST COMPANY</u>		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		<b>X</b>	<b>X</b>
High Satisfactory	<b>X</b>		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors supporting the institution's rating include:

- Lending levels reflect good responsiveness to the assessment areas credit needs;
- An adequate percentage of loans are made in the assessment areas;
- The geographic distribution of loans reflects good penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes;
- A leader in making community development loans;
- The bank provides an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, often in a leadership position;
- Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas; and
- The bank is a leader in providing community development services.



## DESCRIPTION OF INSTITUTION\*

<b>Total assets</b>	<b>\$84.4 billion</b>
<b>Net loans &amp; leases</b>	<b>\$63.5 billion</b>
<b>Total domestic deposits</b>	<b>\$68.2 billion</b>
<b>Number of branches</b>	<b>693</b>
<b>Headquarters</b>	<b>Buffalo, NY</b>
<b>Bank holding company</b>	<b>M&amp;T Bank Corporation</b>

\*Data as of December 31, 2013

Manufacturers and Traders Trust Company (“M&T” or “the bank”) is the principal subsidiary of M&T Bank Corporation, a New York State-based bank holding company. Headquartered in Buffalo, New York, M&T is a full-service commercial bank with offices in New York, Maryland, Pennsylvania, Washington DC, Virginia, West Virginia, Delaware, Florida, Massachusetts, and Connecticut. It is the 20<sup>th</sup> largest bank in the U.S. in terms of asset size. The table above details information regarding the bank.

The bank and its affiliates provide a broad range of financial, commercial and retail services to individuals, corporations, professional clients, government entities, and financial institutions. Bank services include loans, deposits, trust, mortgage banking, asset management, and other financial services.

M&T affiliates relevant to this evaluation include M&T Realty Capital Corporation and M&T Real Estate Trust. Both are wholly-owned subsidiaries of the bank with the principal business of originating and selling commercial, development, and construction loans.

As of December 31, 2013, M&T’s loans consisted of \$4 billion in construction and land development, \$15 billion in residential real estate, \$15 billion in commercial, \$22 billion in other real estate, \$4 billion consumer, and \$61 million in agricultural. Of the total dollar amount of loans, \$15 billion or 24.0% were loans secured by 1-4 family residential properties. M&T provides consumers and small businesses a variety of traditional lending and deposit products and services through several delivery channels including traditional banking offices, ATMs, telephone banking and internet banking. Consumer loan products include indirect and direct residential mortgage, home equity loans and lines, indirect and direct automobile, credit cards, personal loans, student loans, overdraft lines of credit and credit card debt cancellation products. M&T also offers construction lending and commercial loan products, including loans and lines of credit, business credit cards, and Small Business Administration (SBA) loans.

M&T is an active SBA lender. The SBA ranked M&T the 25<sup>th</sup> highest volume lender nationwide by dollar volume for its 7(a) loan program through the third quarter of fiscal year

2014.<sup>1</sup> The 7(a) program is the SBA’s most common loan program, offering funds to small businesses with flexible repayment terms for multiple purposes.

The following table displays the composition of M&T’s loan portfolio as of December 31, 2013.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2013		12/31/2012		12/31/2011	
	\$('000s)	Percent	\$('000s)	Percent	\$('000s)	Percent
Construction and Development	\$4,436,918	7.4	3,775,573	6.1	4,285,614	7.6
Secured by One to Four Family Dwellings	14,532,152	24.2	16,975,708	27.2	13,920,748	24.7
Other Real Estate – Farmland	115,731	0.2	120,121	0.2	116,185	0.2
Other Real Estate – Multifamily	2,964,385	4.9	3,580,823	5.7	2,669,559	4.7
Other Real Estate – Nonfarm nonresidential	18,623,065	31.0	18,483,821	29.6	17,311,757	30.7
Commercial and Industrial	15,192,654	25.3	14,157,531	22.7	12,666,229	22.5
Loans to Individuals	4,152,543	6.9	5,224,173	8.4	5,336,497	9.5
Agricultural Loans	61,310	0.1	61,892	0.1	69,991	0.1
<b>Total</b>	<b>60,078,758</b>	<b>100.0</b>	<b>62,379,642</b>	<b>100.0</b>	<b>57,376,580</b>	<b>100.0</b>
This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are not included in this table.						

Since the previous CRA evaluation of M&T, M&T Bank Corporation expanded its presence to include the States of Massachusetts and Connecticut. In 2012, M&T closed its only branch in Chesterfield County, Virginia; and therefore, removed that county from its assessment area.

As of December 31, 2013, M&T operated in eight states and four multistate metropolitan statistical areas (“MSA”) that are subject to CRA evaluation ratings. The bank’s geographic footprint consists of 45 assessment areas as described below and included in Appendix A:

**Multistate MSAs**

- MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), consisting of:
  - Metropolitan Division (“MD”) 37964 (Philadelphia, PA), including Bucks, Chester, Delaware, Montgomery, and Philadelphia Counties.
  - MD 48864 (Wilmington, DE-MD-NJ), including Cecil County, MD and New Castle County, DE.
- MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), consisting of:
  - MD 35644 (New York-Wayne-White Plains, NY-NJ), including Bronx, Kings, New York, Putnam, Queens, Rockland, and Westchester Counties, NY, and Bergen County, NJ.
  - MD 35004 (Nassau-Suffolk, NY), including Nassau and Suffolk Counties.

<sup>1</sup> <https://es.sba.gov/lenders-top-100>

- MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), consisting of:
  - MD 13644 (Bethesda-Frederick-Rockville, MD), including Frederick and Montgomery Counties.
  - MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV), including the District of Columbia, (“DC”); Calvert, Charles, and Prince George’s Counties in MD; Arlington, Fairfax, Loudon, Prince William, Spotsylvania, Alexandria City, Fairfax City, Falls Church City, Fredericksburg City, Manassas City, and Manassas Park City Counties, VA.
- MSA 19060 (Cumberland, MD-WV), consisting of:
  - Allegany County, MD and Mineral County, WV.

**State of New York**

- MSA 15380 (Buffalo-Niagara Falls, NY), including Erie and Niagara Counties.
- MSA 40380 (Rochester, NY), including Livingston, Monroe, Ontario, Orleans, and Wayne Counties.
- MSA 45060 (Syracuse, NY), including Madison and Onondaga Counties.
- MSA 13780 (Binghamton, NY), including Broome and Tioga Counties.
- MSA 10580 (Albany-Schenectady-Troy, NY), including Albany, Rensselaer, Saratoga, and Schenectady Counties.
- MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY), including Dutchess and Orange Counties.
- MSA 46540 (Utica-Rome, NY), including Herkimer and Oneida Counties.
- MSA 28740 (Kingston, NY), including Ulster County.
- MSA 27060 (Ithaca, NY), including Tompkins County.
- MSA 21300 (Elmira, NY), including Chemung County.
- NY Nonmetropolitan area Group A (Allegany, Cattaraugus, Chautauqua, Genesee, Steuben, and Wyoming Counties).
- NY Nonmetropolitan area Group B (Cayuga, Chenango, Cortland, and Seneca Counties).
- NY Nonmetropolitan area Group C (Sullivan County).

- NY Nonmetropolitan area Group D (Jefferson County).

### **State of Maryland**

- MSA 12580 (Baltimore-Towson, MD), including Anne Arundel, Baltimore, Carroll, Harford, Howard, Queen Anne's, and Baltimore City.
- MSA 25180 (Hagerstown-Martinsburg, MD-WV), including Washington County, MD.
- MSA 41540 (Salisbury, MD), including Wicomico County.
- MD Nonmetropolitan area Group A (Caroline, Dorchester, and Talbot Counties).
- MD Nonmetropolitan area Group B (St. Mary's County, MD).
- MD Nonmetropolitan area Group C (Worcester County, MD).
- MD Nonmetropolitan area Group D (Garrett County, MD).

### **State of Pennsylvania**

- MSA 49620 (York-Hanover, PA), including York County.
- MSA 25420 (Harrisburg-Carlisle, PA), including Cumberland and Dauphin Counties.
- MSA 42540 (Scranton-Wilkes-Barre, PA), including Lackawanna, Luzerne, and Wyoming Counties.
- PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties).
- MSA 11020 (Altoona, PA), including Blair County.
- MSA 39740 (Reading, PA), including Berks County.
- MSA 44300 (State College, PA), including Centre County.
- MSA 29540 (Lancaster, PA), including Lancaster County.
- MSA 48700 (Williamsport, PA), including Lycoming County.
- MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ), including Carbon, Lehigh, and Northampton Counties in PA.
- MSA 30140 (Lebanon, PA), including Lebanon County.

- PA Nonmetropolitan area Group B (Monroe County).
- PA Nonmetropolitan area Group C (Adams, Bedford, Franklin and Huntingdon Counties).
- PA Nonmetropolitan area Group D (Clearfield and Clinton Counties).

#### **State of Delaware**

- DE Nonmetropolitan area (Sussex County).
- MSA 20100 (Dover, DE), including Kent County.

#### **State of Virginia**

- MSA 40060 (Richmond, VA), including Hanover, Henrico, and Richmond City Counties, but excluding Amelia, Caroline, Charles City, Chesterfield, Cumberland, Dinwiddie, Goochland, King and Queen, King William, Louisa, New Kent, Powhatan, Prince George, Sussex, Colonial Heights City, Hopewell City, and Petersburg City Counties.

#### **State of Florida**

- MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL), including Palm Beach County.

#### **State of Massachusetts**

- MD 14484 (Boston-Quincy, MA), including Norfolk and Suffolk Counties.

#### **State of Connecticut**

- MSA 14860 (Bridgeport-Stamford-Norwalk, CT), including Fairfield County.

M&T faced no financial or legal impediments that would prevent it from fulfilling its responsibilities under CRA or from helping to meet the credit needs of its assessment areas consistent with its business strategy, size, financial capacity, and local economic conditions.

#### **Previous Public Evaluation**

M&T received an Outstanding rating as a result of the July 9, 2012 CRA Performance Evaluation conducted by the Federal Reserve Bank of New York. The lending test was rated High Satisfactory, the investment test was rated Outstanding and the service test was rated Outstanding.

## **SCOPE OF EXAMINATION**

### **Procedures**

M&T's CRA performance was reviewed using the Federal Financial Institutions Examination Council's ("FFIEC") Interagency CRA Procedures for Large Institutions, which consists of the lending test, investment test, and service test.

### **Products**

During this evaluation, examiners analyzed home purchase, refinance, and home improvement loans reportable under Home Mortgage Disclosure Act ("HMDA") as well as small business loans reportable under CRA. Examiners verified the integrity of the 2012 and 2013 HMDA and small business loan data reported by M&T and its affiliates. The inclusion of consumer loans is optional under the CRA regulation and M&T chose not to report consumer loans at this exam. Multifamily and small farm loans were excluded from the evaluation since there was insufficient volume to conduct a meaningful analysis. However, multifamily loans qualifying as community development loans were considered in the evaluation of community development lending.

### **Examination Period**

All HMDA-related and small business loans originated between January 1, 2012 and December 31, 2013 were considered in the evaluation. Community development loans, investments, philanthropic grants, and services provided between July 1, 2012 and August 31, 2014 were evaluated as qualifying community development activities.

### **Lending Distribution Analysis**

Under the lending test, borrower and geographic loan distribution analyses were based on loan activity in M&T's assessment areas. M&T's performance was compared to the U.S. Department of Commerce's Bureau of the Census 2010 Census ("2010 Census") demographic data. To evaluate the geographic distribution, the proportion of home purchase, refinance, and home improvement loan originations was compared to the proportion of owner-occupied housing units located in low- and moderate-income ("LMI") geographies of the assessment areas. For small business loans, the analysis compared the proportion of loan originations with the proportion of businesses located in LMI geographies. Performance in low-income and in moderate-income geographies was analyzed separately. The lending analysis took into account lending opportunities in low-income census tracts relative to moderate-income tracts as indicated by demographic data and aggregate lending patterns.

To analyze the distribution of home purchase, refinance, and home improvement lending by borrower characteristics, the proportion of originations to LMI borrowers was compared to the proportion of LMI families residing in the assessment area. Median family income ("MFI") estimates from the FFIEC were used to categorize borrower income. For small business lending,

M&T's proportion of loans to businesses with gross annual revenues ("GAR") of \$1 million or less, based on Dun & Bradstreet data, was compared to the proportion of all such businesses located in the assessment area. The size of the small business loans was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

Demographic and economic information was also considered. Information was obtained from publicly available sources including the 2010 Census, the National Association of Realtors ("NAR"), the U.S. Department of Labor ("DOL"), FFIEC, and U.S. Department of Housing and Urban Development ("HUD").

Borrower and geographic distribution analyses were also based on M&T's 2012 and 2013 performance compared, respectively, to the 2012 and 2013 performance data for the aggregate of all loan reporters in the assessment areas. Aggregate lenders include all lenders required to report HMDA-reportable and CRA small business lending data within the respective assessment areas. For retail services, M&T's branch distribution analysis was conducted using data as of June 30, 2013.

### **Community Development Activity Analysis**

Community development activities were reviewed to determine whether M&T has community development as a primary purpose and meet the geographic requirements of CRA. The eligibility of a loan, investment, or service is based on demographic information available to M&T at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to better understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

### **Community Contacts**

In order to better understand community development and credit needs, several sources were utilized, including publicly accessible data and information submitted by M&T. Twenty (20) community contact interviews were conducted throughout the bank's assessment areas and included representatives of community-based organizations, municipalities and quasi-government agencies. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish a context for the communities in which M&T operates.

## Deriving Overall Conclusions

M&T's performance in New York State received the most weight in determining the bank's overall rating because of its concentration of deposits (41.0%), lending (41.0%), and branches (31.0%). The States of Maryland and Pennsylvania were also weighted significantly. The remaining assessment areas did not have a substantial effect on the overall rating based on lower deposits and lending volumes and market presence. To reach a conclusion about the bank's overall lending performance in each assessment area, products were weighted based on their volume in that area. For additional details, see Exhibit I on page 10, Summary of Key Assessment Area Data on page 10, which contains a summary of assessment area data for all rated areas.

Full scope reviews were conducted for the following assessment areas:

- **Multistate MSAs:** MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), MSA 19060 (Cumberland, MD-WV)
- **New York State:** MSA 15380 (Buffalo-Niagara Falls, NY), MSA 40380 (Rochester, NY), MSA 45060 (Syracuse, NY), and MSA 13780 (Binghamton, NY)
- **Maryland:** MSA 12580 (Baltimore-Towson, MD)
- **Pennsylvania:** MSA 49620 (York-Hanover, PA), MSA 25420 (Harrisburg-Carlisle, PA), MSA 42540 (Scranton—Wilkes-Barre, PA), PA Nonmetropolitan Group A, and MSA 11020 (Altoona, PA)
- **State of Delaware:** DE Nonmetropolitan area (Sussex County)
- **State of Virginia:** MSA 40060 (Richmond, VA)
- **State of Florida:** MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)
- **State of Massachusetts:** MD 14484 (Boston-Quincy, MA)

**State of Connecticut:** MSA 14860 (Bridgeport-Stamford-Norwalk, CT)

All other assessment areas received a limited scope review because M&T has limited branches, branch deposits, and lending in that assessment area.



EXHIBIT I: Summary of Key Assessment Area Data													
	MSA 37980	MSA 35620	MSA 47900	MSA 19060	New York	Maryland	Pennsylvania	Delaware	Virginia	Florida	Massachusetts	Connecticut	TOTALS
Total Population <sup>4</sup>	4,648,581	12,804,911	5,282,899	103,299	6,036,835	3,143,354	4,694,433	359,455	611,012	1,320,134	1,131,184	916,829	41,052,926
Population % of AA population	11%	31%	13%	0.3%	15%	8%	11%	0.9%	1%	3%	3%	2%	100%
Families	1,111,319	3,009,890	1,233,540	25,444	1,509,218	777,100	1,224,668	91,966	146,552	384,995	307,653	230,561	9,514,692
Families % of AA families	12%	32%	13%	0.27%	16%	8%	13%	1%	2%	4%	3%	2%	100%
Total Census Tracts <sup>4</sup>	1,148	3,150	1,279	30	1,570	776	1,073	87	253	338	334	211	10,249
Tracts % AA tracts	11%	31%	12%	<1%	15%	8%	10%	1%	2%	3%	3%	2%	100%
LMI tracts	385	1,008	436	5	422	271	235	12	59	105	119	110	2,938
LMI tracts % all AA LMI tracts	13%	34%	15%	0%	14%	9%	8%	0%	2%	4%	4%	4%	100%
Total Owner-Occupied Units <sup>4</sup>	1,182,107	2,198,437	1,254,675	29,066	1,609,803	806,079	1,309,200	102,459	149,312	384,995	283,426	234,419	9,543,978
Units % of AA units	12%	23%	13%	<1%	17%	8%	14%	1%	2%	4%	3%	2%	100%
Business Establishments <sup>5</sup>	229,971	668,323	297,083	3,773	264,825	151,382	213,635	17,909	34,966	109,302	76,316	70,080	2,137,565
Bus. est. % AA bus. est.	11%	31%	14%	<1%	12%	7%	10%	1%	2%	5%	4%	3%	100%
Number of Branches <sup>1</sup>	47	35	77	8	213	126	159	22	5	1	0	0	693
Branches % all branches	7%	5%	11%	1%	31%	18%	23%	3%	0.7%	0.1%	0.0%	0.0%	100%
Branches in LMI tracts	10	4	29	4	44	35	29	3	2	0	0	0	160
LMI branches % AA LMI branches	6%	3%	18%	3%	28%	22%	18%	2%	1%	0.0%	0%	0%	100%
Branch Deposits (\$'000,000s) <sup>2</sup>	4,600	4,942	4,063	206	27,207	15,175	8,516	1,380	68	15	0	0	66,172
Deposits % AA deposits	7%	7%	6%	0.31%	41%	23%	13%	2%	0.10%	0.02%	0%	0%	100%
Deposit Market Share (%)/ Rank in Market	1/11	.47/21	2/11	23/2	3/7	15/2	3/5	1/8	.10/21	.04/52	n/a	n/a	n/a
Home Purchase Originations <sup>3</sup>	1,216	2,261	1,176	26	9,308	1,250	2,297	231	198	52	79	170	18,264
HP originations % AA orig.	7%	12%	6%	0.14%	51%	7%	13%	1.26%	1.08%	0.28%	0.43%	0.93%	100%
Refinance Originations <sup>3</sup>	1,823	1,396	2,213	100	5,692	2,696	3,309	408	138	128	123	140	18,166
Refi orig. % AA orig.	10%	8%	12%	1%	31%	15%	18%	2%	0.76%	0.70%	1%	1%	100%
Home Improvement Originations <sup>3</sup>	209	149	205	62	1,752	717	1,018	168	4	1	3	5	4,293
Home Improvement orig. % AA orig.	5%	3%	5%	1%	41%	17%	24%	4%	0.09%	0%	0%	0%	100%
Small Business Originations <sup>3</sup>	1,035	1,134	1,237	113	6,194	1,983	3,124	259	73	7	43	31	15,233
SB orig. % AA orig.	7%	7%	8%	1%	41%	13%	21%	2%	0.48%	0.05%	0%	0%	100%
Combined Loan Totals	4,283	4,940	4,831	301	22,946	6,646	9,748	1,066	413	188	248	346	55,956
% of AA Orig.	8%	9%	9%	1%	41%	12%	17%	2%	1%	0.34%	0%	1%	100%

(1) Branch numbers are as of 12/31/2013. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/13. (3) Originations are loans reported under HMDA or CRA small business reporting for 2012 and 2013. (4) Demographic information was obtained from the 2010 Census. (5) Business establishments information was reported by Dun & Bradstreet for 2013.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

M&T's overall performance under the lending test is rated "High Satisfactory." This conclusion is based on excellent performance in the multistate MSA 47900 (Washington-Arlington-Alexandria DC-VA-MD-WV) and good performance in the multistate assessment areas of MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), and MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) and the States of New York, Maryland, Pennsylvania, Delaware, and Virginia. Performance was adequate in the multistate assessment area of MSA 19060 (Cumberland, MD-WV) and the States of Florida, Massachusetts, and Connecticut. The major factors contributing to this overall rating are good responsiveness to the retail credit needs of the community, an excellent level of community development loans and good geographic and borrower distribution for HMDA and small business loans.

Throughout this report, references are made to M&T's and the aggregate's lending distribution by geography and borrower income. Detailed information about the bank's and aggregate's percentage of HMDA- and CRA- reportable loans can be found in the tables in Appendices G and H. In some assessment areas and products, only general references are made comparing performance thus the reader should refer to the tables for specific data. The table in Appendix E contains data used to evaluate the community development component of the lending test.

### Lending Activity

M&T's lending levels reflect good responsiveness to the credit needs of the assessment areas, given the bank's capacity to meet assessment areas' credit needs and overall market conditions. This conclusion is based on excellent performance in the multistate assessment area of MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) and MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), good performance in the states of New York, Delaware, and Virginia, and in the multistate assessment area of MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), and adequate performance in the states of Maryland, Pennsylvania, Florida, Massachusetts, and Connecticut, and in the multistate assessment area MSA 19060 (Cumberland, MD-WV).

<b>EXHIBIT II</b>				
<b>SUMMARY OF LENDING ACTIVITY</b>				
<b>JANUARY 1, 2012 – DECEMBER 31, 2013</b>				
<b>LOAN TYPE</b>	<b>#</b>	<b>%</b>	<b>\$('000s)</b>	<b>%</b>
HMDA Home Purchase	31,344	33	\$6,525,571	34
HMDA Refinancing	42,855	45	\$8,811,390	46
HMDA Home Improvement	4,704	5	\$589,954	3
<b>Total HMDA-Related</b>	<b>78,903</b>	<b>83</b>	<b>\$15,926,915</b>	<b>83</b>
<b>Total Small Business</b>	<b>16,092</b>	<b>17</b>	<b>\$3,167,752</b>	<b>17</b>
<b>TOTAL LOANS</b>	<b>94,995</b>	<b>100</b>	<b>\$19,094,667</b>	<b>100</b>

Note: This table includes bank and affiliate loans made within the evaluation period.

Overall, M&T made 94,995 home purchase, refinance, home improvement, and small business loans during the evaluation period, totaling \$19 billion, as detailed in Exhibit II above. As the data shows, M&T originated more HMDA-related loans than small business loans by number and dollar amount. As a result, HMDA-related lending typically had a greater impact on lending ratings.

### Assessment Area Concentration

M&T originated an adequate percentage of loans in the bank's assessment areas, as detailed in the table below. M&T made an adequate number of HMDA-related loans and a substantial majority of small business loans distributed within the assessment areas. Overall, this indicated that M&T's willingness to originate loans that meet the credit needs of its delineated assessment areas.

<b>EXHIBIT III</b>								
<b>LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREA</b>								
<b>JANUARY 1, 2012 – DECEMBER 31, 2013</b>								
<b>LOAN TYPE</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>\$('000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$('000s)</b>	<b>%</b>
HMDA Home Purchase	18,171	58	\$3,757,218	60	13,022	42	\$2,457,010	40
HMDA Refinancing	18,184	42	\$3,670,618	42	24,610	58	\$5,082,574	58
HMDA Home Improvement	4,279	92	\$398,349	86	396	8	\$62,799	14
<b>Total HMDA-Related</b>	<b>40,634</b>	<b>52</b>	<b>\$7,826,185</b>	<b>51</b>	<b>38,028</b>	<b>48</b>	<b>\$7,602,383</b>	<b>49</b>
<b>Total Small Business</b>	<b>14,330</b>	<b>94</b>	<b>\$2,557,496</b>	<b>89</b>	<b>880</b>	<b>6</b>	<b>\$306,902</b>	<b>11</b>
<b>TOTAL LOANS</b>	<b>54,964</b>	<b>59</b>	<b>\$10,383,681</b>	<b>57</b>	<b>38,908</b>	<b>41</b>	<b>\$7,909,285</b>	<b>43</b>

Note: This table includes only loans originated or purchased by the bank. Affiliate loans are not included.

### Geographic Distribution

The overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the assessment areas. This conclusion is based on excellent penetration in multistate MSA 47900 (Washington-Arlington-Alexandria DC-VA-MD-WY) and the State of

Connecticut, and good penetration in the States of New York, Maryland, Pennsylvania, Delaware, Virginia, and Massachusetts, as well as MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), and MSA 19060 (Cumberland, MD-WV). Performance was adequate in the State of Florida. The analysis considered performance context issues, such as the number of owner-occupied units in LMI geographies and the market aggregate’s performance. Consideration was given for the very limited lending opportunities available in some assessment areas, as denoted in the low number of loans made by the aggregate.

**Borrower Distribution**

M&T’s overall distribution of loans among borrowers of different income levels and businesses of different sizes was good, based on good distribution in the States of New York, Pennsylvania, and Delaware, and in the multistate MSA 19060 (Cumberland, MD-WV). Performance was adequate in the States of Maryland and Florida, and in the multistate assessment areas of MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), and MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WY). Borrower distribution was poor in the States of Virginia, Massachusetts, and Connecticut. In making this conclusion, consideration was given for the very limited lending opportunities available in some assessment areas, as denoted in the low number of loans made by the aggregate.

**Community Development Lending**

M&T was a leader in making community development loans. As detailed in the table to the right, M&T extended 511 community development loans for a variety of purposes that total \$3.2 billion over a period of 26 months within its assessment areas. M&T’s community development lending performance was excellent in New York State (36.7% of community development lending conducted inside the bank’s assessment areas) and the State of Maryland, and in the multistate assessment areas of MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), and MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), good in the States of Pennsylvania and Virginia, and adequate in the States of Delaware, Massachusetts, Florida, and Connecticut. Community development lending in MSA 19060 (Cumberland, MD-WV) was considered very poor as the bank has not made any community development loans over the past two evaluation cycles due to limited opportunities. The MSA 19060 (Cumberland MD-WV) assessment area represents only 0.31% of deposits; therefore, the lack of community development lending does not negatively affect the bank’s performance.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	157	\$701,536
Economic Development	70	\$241,702
Community Services	184	\$821,709
Revitalize and Stabilize	100	\$1,396,450
<b>Total</b>	<b>511</b>	<b>\$3,160,397</b>

M&T's community development lending was responsive to community needs. The community development loans originated during the evaluation period were for a variety of purposes, with 44.0% of the dollar amount of all community development loans for revitalization of targeted communities located in LMI areas and empowerment zones, 26.0% for community development services that benefited LMI individuals, 22.0% for the financing of affordable housing, and 8.0% for promotion of economic development including job creation.

The bank's community development lending volume exceeded similarly-situated banks in the full scope assessment areas of New York, Maryland, Pennsylvania, and Virginia, and in the multistate areas of MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), and MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD).

Finally, consideration was given to community development loans without a purpose, mandate, or function of serving any of M&T's delineated assessment areas. M&T made 41 qualified community development loans totaling \$356.7 million. These loans supported affordable housing, economic development, community services, and revitalization projects that benefited counties within the states, but outside of M&T's delineated assessment areas within New York, Pennsylvania, New Jersey, Virginia, Connecticut, and Massachusetts. M&T also made eight qualified community development loans totaling \$107.1 million that benefitted areas outside M&T's delineated CRA footprint. These loans primarily supported community services and to a lesser extent affordable housing. These loans were primarily made in Alabama and Michigan by M&T's healthcare group.

For community development loan details, see Appendix E.

### **Product Innovation**

M&T made extensive use of innovative or flexible products that served to enhance the level of lending in LMI geographies and to LMI borrowers. Examples of responsive products targeted to specific community needs in the bank's various assessment areas include:

- M&T participates in the New York Energy Smart Loan Fund, which is administered by the New York State Energy Research and Development Authority. This fund provides reduced interest rate loans to finance renovations or construction projects that improve a facility's energy efficiency or incorporate renewable energy systems.
- M&T's FHA, VA, and USDA community loan products offer discounted rates to applicants purchasing homes in LMI communities or those who are LMI borrowers. M&T offers a lender credit up to \$2,000 for closing costs.
- M&T has an exclusive relationship with the State of New York Mortgage Agency (SONYMA) to offer the New York State Office of Mental Retardation and

Developmental Disabilities’ Home of Your Own program. This program was developed in conjunction with the NYS Office for People with Developmental Disabilities (OPWDD) and is targeted to individuals with intellectual or developmental disabilities, income-eligible parents or legal guardians of these individuals, and income-eligible direct support professionals. M&T provides fee-free, interest bearing savings accounts to participants and monthly activity reporting to OPWDD. OPWDD provides counseling to enrollees and monitoring their progress during the savings period. During this evaluation, there were 70 active savers enrolled in this program.

- M&T offers the “First Home Club Program” throughout New York State, which is a matched savings program funded by the Federal Home Loan Bank of New York. The savings program provides a three-to-one match up to \$7,500 to be applied towards home down payment and closing costs. To qualify for the program, depositors must meet income guidelines. Program participants are also required to open a free personal savings account and demonstrate a commitment to saving over a 10 to 24 month period. Clients also participate in homebuyer counseling, which is provided in partnership with nonprofit organizations throughout the State. M&T Bank is ranked the #1 First Home Club Lender in New York State. During 2012 and 2013, M&T enrolled almost 1,800 clients in the First Home Club and closed loans for more than 650 new LMI first time homebuyers.

## INVESTMENT TEST

M&T’s performance under the investment test is rated outstanding based on excellent performance in the States of New York and Maryland, and in the multistate assessment areas of MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) and MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA). M&T’s performance was good in the State of Pennsylvania and in the multistate assessment area of MSA 19060 (Cumberland, MD-WV). Performance was adequate in the States of Delaware, Virginia, Florida, Massachusetts, and Connecticut.

As shown in the table to the right, M&T had qualified investments totaling approximately \$574 million which included 72 new investments totaling \$246 million and \$28 million in grants or donations to organizations providing community development services throughout the assessment areas.

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	568	\$341,543
Community Services	1,733	\$148,592
Economic Development	112	\$28,727
Revitalize & Stabilize	63	\$29,132
Neighborhood Stabilization	2	\$26,300
<b>Total</b>	<b>2,478</b>	<b>\$574,294</b>

From prior periods, M&T holds outstanding investments [primarily in the form of low-income housing tax credits (“LIHTCs”) and mortgage-backed securities (“MBS”)] that have a current book value of \$300 million. Finally, consideration was given to investments without a purpose, mandate, or function of serving

M&T's delineated assessment areas, since M&T adequately addressed the community development needs of its various assessment areas. M&T made \$36.5 million in qualified investments, typically in the form of MBS, LIHTCs, and equity investments in SBIC and bond funds that benefitted counties within the state, but outside M&T's delineated assessment areas in New York, Pennsylvania, Maryland, Virginia, Connecticut, and Massachusetts.

M&T exhibited good responsiveness to community development needs. In terms of dollar volume, qualified investments primarily supported the development of affordable housing, which according to community contacts is an important community credit need, with \$342 million or 60.0% of total investments dedicated to the development of affordable housing. Of the total affordable housing dollars, M&T made \$74 million or 13.0% of total qualified investments in MBS. While MBS are qualified investments that provide some liquidity to the market, they are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments.

M&T made significant use of innovative and/or complex investments to support community development initiatives. M&T made \$237 million or 41.0% of total investments in LIHTC, which are considered complex investments that support community development initiatives. The bank also invested \$26 million in Healthy Neighborhoods Inc.'s loan program, which is part of the Neighborhood Stabilization Program ("NSP") in Baltimore, Maryland. NSP was established by the Department of Housing and Urban Development ("HUD") for the purpose of stabilizing communities that have suffered from foreclosures and abandonment. In addition, \$7 million was invested in a solar tax credit project that provides energy efficiency alternatives in LMI areas.

Details of qualified investments may be found in Appendix F.

## **SERVICE TEST**

M&T's overall rating on the service test is outstanding based primarily on excellent performance in the States of New York, Maryland, Pennsylvania, and in the multistate assessment area of MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV). Performance was good in the State of Virginia and in the multistate assessment areas of MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE), and MSA 19060 (Cumberland, MD-WV), while performance was adequate in the States of Delaware, Florida, Connecticut, and Massachusetts.

## **Retail Services**

M&T's branches were readily accessible to all portions of its assessment areas. The bank operated 693 branches, of which 37 (5.0%) were located in low-income tracts and 123 (18.0%) were in moderate-income tracts. Alternative delivery systems enhanced the bank's performance. M&T operated 807 off-site ATM locations throughout its assessment areas, of which 42 (5.0%) of these ATMs were located in low-income areas and 110 (14.0%) were in moderate-income



areas. M&T also has business relationships with 20 other financial institutions, which allow the bank's customers to use the ATMs owned by these institutions free of charge. Four of these ATMs are located in LMI areas.

Although the bank opened and closed branches, the changes did not adversely affect overall accessibility of delivery systems. During the evaluation period, M&T opened five new branches, one of which was located in an LMI area. In addition, the bank closed 72 branches during the evaluation period. Of these, six branches were located in low-income areas and 17 were in moderate-income areas.

Extended morning, evening and Saturday hours were widely scheduled and tailored to the convenience and needs of the assessment areas, particularly LMI geographies or LMI individuals. In full-scope LMI areas, 102 out of the 128 branches (80.0%) have extended morning, evening, and Saturday hours. In addition, the bank offers alternative delivery systems such as bank by-mail, on-line services, electronic statements, telephone sales, and 24-hour automated services, not specifically targeted to LMI individuals but serving all bank customers.

### Community Development Services

M&T was a leader in providing community development services throughout the assessment areas. The table to the right demonstrates the level and type provided, including sponsoring and participating in a significant number of seminars and presentations relating to affordable mortgages, small business assistance, and other banking education throughout the assessment areas. These types of events provided technical assistance and training to LMI individuals, community organizations, small businesses and housing agencies.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	4,190
Financial Literacy Seminars	120
Technical Assistance / Small Business Seminars	179
<b>Total</b>	<b>4,489</b>

M&T employees also served on the boards and committees of 564 community development organizations and provided financial management expertise and technical assistance to these organizations.

The following are examples of community development services provided by the bank:

- M&T Nonprofit Checking account is designed specifically for nonprofit organizations that provide community services to LMI individuals. The product is available in all markets and meets the needs of both large and small nonprofit organizations. There are no deposit charges and the \$7.50 monthly maintenance fee can be avoided with an average monthly balance of \$500 or enrollment in e-statements.



- M&T is an active member in the Federal Home Loan Bank of New York's ("FHLB") Affordable Housing Program ("AHP"). The AHP provides subsidies for projects that finance the creation and rehabilitation of single and multifamily housing for LMI individuals, or projects which finance rental housing where at least 20.0% of the units will be occupied by and affordable to households at 50.0% or below the area median income. Only member institutions of the FHLB can submit AHP applications. Therefore, nonprofit agencies, local governments, and community development organizations must obtain the sponsorship of member institutions to apply for AHP funds. As a member, M&T is responsible for monitoring the approved project and ensuring that the affordable housing project is consistent with its approved program objectives. In 2012 and 2013, M&T was successful in securing commitments for 24 new AHP applications realizing \$11.7 million in grant funds. These projects will create 1,179 units of affordable housing. At year-end 2013, M&T had over \$66 million in total financing commitments and \$60 million in disbursements in AHP.
- M&T offers the "First Home Club Program" throughout its New York State assessment area for depositors that meet income guidelines, effectively reserving the program for LMI families. Once eligibility is determined, clients participate in homebuyer counseling in preparation for the mortgage process and the responsibilities of homeownership. M&T offers the program in partnership with nonprofit organizations across the state that assist in providing the homebuyer counseling. During 2012 and 2013, M&T enrolled almost 1,800 clients in the First Home Club and closed loans for more than 650 new LMI first-time homebuyers. Homebuyers received subsidies in excess of \$3.5 million and First Home Club counseling partners benefitted from counseling subsidies of up to \$500 in reimbursement to help defray costs associated with the provision of credit and homeownership counseling to participating First Home Club households.
- M&T has partnered with NextJob, a national reemployment solutions company, in an effort to proactively mitigate growing delinquency levels caused by unemployment or underemployment, and to proactively engage households at risk of future default. The NextJob program works to assist bank mortgage customers to re-enter the workforce through employment training and job coaching services. The comprehensive employment services provided by NextJob include 16 weeks of one-on-one personalized job coaching, 39 weeks of on-line job search training and virtual job coach software, and 13 weeks of webinars with jobseekers and coaches to share ideas and receive support and encouragement to continue their job search. All program costs are assumed by M&T (\$1,200 referral fee per "fully engaged" job seeker). M&T randomly selected 150 customers who were between 32-75 days delinquent due to unemployment or underemployment to participate in the program. Of those 150, 75 were in a forbearance plan and the other half were not in an approved assistance option.

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”) established the Consumer Financial Protection Bureau (“CFPB”). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of Federal consumer financial laws. The Federal Reserve; however, retains authority to enforce compliance with M&T’s CRA and certain other consumer compliance laws and regulations.

M&T is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices was identified as being inconsistent with helping to meet community credit needs.

## MULTISTATE METROPOLITAN AREA

***CRA RATING FOR MSA 37980 (PHILADELPHIA-CAMDEN-WILMINGTON, PA-NJ-DE-MD)<sup>2</sup>: SATISFACTORY***

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

***The Investment test is rated: Outstanding***

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

The major factors supporting the rating include:

- Good responsiveness to assessment area credit needs;
- An excellent level of qualified community development investments;
- A leader in making community development loans;
- A good geographic distribution of loans in the bank's assessment area;
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- Reasonably accessible delivery systems to LMI geographies and individuals of different income levels;
- A record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals;
- The bank's reasonableness of business hours and services do not vary in a way that inconveniences any portions of the assessment area; and
- A leader in providing community development services.

### SCOPE OF EXAMINATION

Examiners conducted a full-scope review of multistate MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) based on deposit concentration, lending volume, and branch office network. As shown in Exhibit I on page 10, activities in this multistate MSA made up 7.0% of the bank's deposits, 7.0% of branches, and 8.0% of loans.

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<sup>2</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of the state contained within the multistate metropolitan area.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 37980 (PHILADELPHIA-CAMDEN-WILMINGTON, PA-NJ-DE-MD)**

M&T operates 47 branches in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), as of December 31, 2013, representing 7.0% of all of M&T branches. The majority of assessment area deposits and branches are in MD 37964 (Philadelphia, PA). Based on deposits reported to the Federal Deposit Insurance Corporation ("FDIC") as of June 30, 2013, M&T ranked 11<sup>th</sup> in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) with \$4.6 billion in deposits or 1.0% of the retail deposit market. This assessment area is a competitive marketplace where large regional banks compete. Some of M&T's primary competitors in this assessment area are PNC Bank, Bank of America, NA, Citibank, NA, and Sovereign Bank, NA.

### **Community Contacts**

In order to learn more about community credit needs, examiners conducted interviews with community representatives and reviewed documentation prepared by other regulatory agencies to provide some perspective on the credit needs of the assessment area. Community representatives identified a need for affordable rental housing for the assessment area's low income population. The representatives also indicated a need for operating capital for nonprofit community groups as well as lending and technical assistance to small- and medium-sized businesses. Community contacts also agreed that financial literacy and homeownership counseling were pressing needs.

### **PERFORMANCE CONTEXT**

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

#### **Demographic Characteristics**

MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) encompasses the City of Philadelphia and parts of southeastern Pennsylvania, southern New Jersey, northern Delaware, and northeastern Maryland. The MSA assessment area consists of the MD 37964 (Philadelphia, PA), which includes five Pennsylvania counties (Bucks, Chester, Delaware, Montgomery and Philadelphia), and MD 48864 (Wilmington, DE-MD-NJ), which includes New Castle County, Delaware, and Cecil County, Maryland.

According to the 2010 Census, the assessment area has a population of approximately 4.6 million. This population is concentrated in the City of Philadelphia, which contains 33.0% of assessment area residents. Of the area's 385 LMI census tracts, 110 or 29.0% are located in the City of Philadelphia. The suburban Philadelphia counties continue to be important in terms of

growth, not only as bedroom communities for commuters into the city, but also as business, industry, and retail centers.

The City of Wilmington, DE, with a population of 72,644, is the largest city in Delaware. Of the area's 348 LMI census tracts, 18 or 5.0%, are located in the City of Wilmington.

Income Characteristics

The 2010 Census indicates that 39.7% of families in the assessment area are designated as LMI and 9.0% of families live below poverty level. The 2012 and 2013 FFIEC-adjusted MFI estimates for the assessment area MDs are shown in the accompanying table to the right. Lower incomes and higher poverty levels are concentrated in the City of Philadelphia.

FFIEC MEDIAN FAMILY INCOMES		
Area	2012	2013
MD 37964	\$79,200	\$76,400
MD 48864	\$81,900	\$79,300

Housing Characteristics

The 2010 Census reports that the MSA has approximately 1.9 million housing units, of which 1.2 million units or 62.0% are owner-occupied, 28.9% are rental, and 9.0% are vacant. Approximately, 25.7% of all owner-occupied units in the MSA are located in LMI census tracts. The median age of housing in the assessment area is 52 years, indicating there are opportunities and a need for HMDA lending.

During the evaluation period, housing prices increased slightly. According to NAR, the median sales price for existing single-family homes in the assessment area was \$220,300 in 2013 and \$213,400 in 2012 as the average price of a house in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) increased by roughly 3.2% over the last year.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 229,971 businesses in 2013, of which 88.9% were small businesses with GAR of \$1 million or less.

MSA 37980's (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) primary industries are education, health services, trade, transportation, and the utilities sectors. The healthcare sector of the economy benefits from the large teaching hospitals in the city, including Thomas Jefferson University Hospital, the University of Pennsylvania Hospital, and Temple University Hospital. The Jefferson Health System and the University of Pennsylvania are the two largest private sector employers in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD). The professional and business services, local government, and tourism and hospitality industries also play an important role in the area economy.

According to the U.S. Department of Labor, unemployment decreased slightly across the MSA. As shown in the table to the right, Philadelphia County, PA and the Cecil County MD, have the highest unemployment rates in the assessment area. The City of Wilmington is a national financial center for the credit card industry and a center for retail banking. The City of Wilmington market is dominated by large super-regional banks.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 37980	8.5%	7.8%
Bucks County, PA	7.4%	6.9%
Chester County, PA	6.2%	5.8%
Delaware County, PA	8.1%	7.5%
Montgomery County, PA	6.8%	6.3%
Philadelphia County, PA	10.8%	10.0%
New Castle County, DE	7.0%	6.7%
Cecil County, MD	8.1%	7.7%
State of Pennsylvania	7.9%	7.4%
State of Delaware	7.1%	6.7%
State of Maryland	6.9%	6.6%

Additional performance context data for this assessment area is provided in the MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) Assessment Area Demographics on the next page.

<b>Assessment Area Demographics</b> <b>Assessment Area: MSA 37980</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	169	14.7	137,301	12.4	46,786	34.1	255,813	23.0
Moderate-income	216	18.8	195,885	17.6	26,584	13.6	185,084	16.7
Middle-income	357	31.1	350,331	31.5	17,900	5.1	213,155	19.2
Upper-income	388	33.8	427,727	38.5	9,091	2.1	457,267	41.1
Unknown-income	18	1.6	75	0.0	44	58.7	0	0.0
<b>Total Assessment Area</b>	<b>1,148</b>	<b>100.0</b>	<b>1,111,319</b>	<b>100.0</b>	<b>100,405</b>	<b>9.0</b>	<b>1,111,319</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	291,004	110,310	9.3	37.9	126,247	43.4	54,447	18.7
Moderate-income	373,212	193,890	16.4	52.0	137,970	37.0	41,352	11.1
Middle-income	593,251	384,360	32.5	64.8	167,055	28.2	41,836	7.1
Upper-income	645,839	493,506	41.7	76.4	119,333	18.5	33,000	5.1
Unknown-income	495	41	0.0	8.3	348	70.3	106	21.4
<b>Total Assessment Area</b>	<b>1,903,801</b>	<b>1,182,107</b>	<b>100.0</b>	<b>62.1</b>	<b>550,953</b>	<b>28.9</b>	<b>170,741</b>	<b>9.0</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	
Low-income	18,895	8.2	16,568	8.1	1,199	7.2	1,128	12.7
Moderate-income	32,018	13.9	28,234	13.8	2,251	13.6	1,533	17.2
Middle-income	70,610	30.7	62,656	30.6	5,191	31.3	2,763	31.0
Upper-income	107,381	46.7	96,295	47.1	7,688	46.3	3,398	38.2
Unknown-income	1,067	0.5	705	0.3	282	1.7	80	0.9
<b>Total Assessment Area</b>	<b>229,971</b>	<b>100.0</b>	<b>204,458</b>	<b>100.0</b>	<b>16,611</b>	<b>100.0</b>	<b>8,902</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>88.9</b>		<b>7.2</b>		<b>3.9</b>

Based on 2010 ACS Information.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 37980 (PHILADELPHIA-CAMDEN-WILMINGTON, PA-NJ-DE-MD)**

**LENDING TEST**

M&T's performance under the lending test in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) was good. This conclusion is based on good lending activity performance, good geographic distribution performance, adequate borrower distribution performance, and being a leader in making community development loans. Greater weight was given to the

analysis of refinance and home purchase lending performance followed by small business and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the evaluation of community development lending, and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) reflect good responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volume compared to the prior evaluation, market share, and performance compared to peer banks and market aggregate data. Lending volume compared to the prior evaluation and to the aggregate of all lenders in the assessment area indicated that M&T's lending volume was significantly above the aggregate lending volume in this MSA.

M&T's market share of deposits and lending in the assessment area increased since the prior evaluation period. In 2013, M&T had deposit market share of 1.0%, and lending market share of 0.97% in home purchase lending, 0.80% in refinance lending, 1.0% in home improvement lending, and 0.73% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 0.18%, and lending market share was 0.41% in home purchase lending, 0.35% in refinance lending, 0.47% in home improvement lending, and 0.31% in small business lending.

Overall HMDA and small business volumes increased compared to the last evaluation. This increase was driven primarily by increases in home purchase (120.0%), refinance (101.0%), home improvement (74.0%), and small business (58.0%) loan volumes. Comparisons to the aggregate data for the evaluation period indicated overall increased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T's performance was consistent with the lending volume of similarly-situated banks.

### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration in the multistate MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area. Lending penetration in LMI census tracts was good for home purchase, refinance, and small business lending, and excellent for home improvement lending. HMDA-related performance in low-income census tracts in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) was impacted by the number of families with incomes below the poverty level (34.1%) in low-income census tracts and the high cost of housing in relation to income as the median price of a home in 2013 was six times the income of a low-income borrower.



During the evaluation period, M&T originated loans in a majority of the census tracts within the assessment area, while low-income census tracts had a greater percentage of tracts without loans. As shown in the table below, in 2012 and 2013, M&T originated loans in 55 of 169 (32.5%) low-income census tracts and 132 of 216 (61.0%) moderate-income census tracts. According to the 2010 Census data, approximately 12.4% of families reside in low-income tracts and 15.3% of housing units are in low-income tracts. The owner-occupancy rate for low-income tracts was 37.9%, and 43.4% of all housing units are rental units. The poverty rate for low-income tracts was 34.1%, thus limiting opportunities to originate residential loans. The table below details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	169	120	29%
Moderate	216	68	69%
Middle	357	92	74%
Upper	388	118	70%
<b>2012</b>			
Low	169	111	34%
Moderate	216	84	61%
Middle	357	86	76%
Upper	388	86	78%

### *Home Purchase*

The overall distribution of home purchase loans in LMI census tracts was good based on excellent lending in moderate-income tracts and poor distribution in low-income tracts. M&T's home purchase lending in low-income census tracts was poor in part due to the high poverty rate in low-income tracts which limits opportunities to lend. In 2013, M&T made 4.3% by number and 2.5% by dollar volume of its home purchase loans in low-income census tracts which was below the demographic which indicates that 9.3% of owner-occupied housing units are located in low-income census tracts and below the performance of the aggregate which made 5.7% by number and 3.2% by dollar volume of its home purchase loans in low-income census tracts. Home purchase lending performance in 2012 exceeded 2013's performance as home purchase performance exceeded both the demographic and the aggregate.

Home purchase lending in moderate-income census tracts was excellent. In 2013, M&T made 21.7% by number and 14.1% by dollar volume of its home purchase loans in moderate-income census tracts which were above the demographics which indicated 16.4% of owner-occupied housing units were located in moderate-income census tracts and also was above the aggregate which made 14.7% by number and 9.7% by dollar volume of its home purchase loans in

moderate-income census tracts. Home purchase lending in 2012 was comparable to 2013 as performance exceeded both the demographic and the aggregate.

### *Refinance*

The overall distribution of refinance loans in LMI census tracts was good based on excellent lending in moderate-income tracts and poor distribution in low-income tracts. Refinance lending in low-income census tracts was poor as opportunities for refinance lending were impacted by the high poverty rates. In 2013, M&T made 3.5% by number and 1.4% by dollar volume of its refinance loans in low-income census tracts which were below the demographic which indicated 9.3% of owner occupied-housing units were located in low-income census tracts and below the aggregate which made 3.8% by number and 9.7% by dollar volume of its refinance loans in low-income census tracts. Refinance lending in 2012 was comparable to 2013 as performance was below the demographic but exceeded the aggregate.

M&T's refinance lending in moderate-income census tracts was excellent. In 2013, M&T made 18.9% by number and 12.1% by dollar volume of its refinance loans in moderate-income census tracts which was above the 16.4% of owner-occupied housing units located in moderate-income census tracts. Refinance performance was also above the aggregate which also made 11.8% by number and 15.9% by dollar volume of its refinance loans in moderate-income census tracts. Refinance lending in 2013 exceeded 2012's performance as 2012's performance was below the demographic but exceeded the aggregate.

### *Home Improvement*

The overall distribution of home improvement loans in LMI census tracts was excellent based on excellent lending in moderate-income tracts and adequate distribution in low-income tracts. Home improvement lending in low-income census tracts was adequate. In 2013, M&T made 7.4% by number and 2.1% by dollar volume of its home improvement loans in low-income census tracts which was below the demographic which indicated 9.3% of owner-occupied housing units were in low-income census tracts. Home improvement performance was also below the aggregate which made 8.8% by number and 4.0% by dollar volume in low-income census tracts. Home improvement lending in 2012 was comparable to 2013 but below the demographic and aggregate.

Home improvement lending in moderate-income census tracts was excellent. In 2013, M&T made 20.0% by number and 24.6% by dollar volume of its home improvement loans in moderate-income census tracts which were above the demographics of the assessment area, which indicated that 16.4% of the available owner-occupied housing units are located in moderate-income census tracts. Home improvement performance was also above the aggregate which made 15.3% by number and 8.0% by dollar volume of its home improvement loans in moderate-income census tracts. Home improvement lending in 2012 was also excellent as performance was above the demographic and similar to the aggregate.

### *Small Business*

The overall distribution of small business loans in LMI census tracts was good based on excellent lending in moderate-income tracts and poor distribution in low-income tracts. In 2013, M&T's small business lending in low-income census tracts was poor. M&T originated 2.4% by number and 1.7% by dollar volume of its small business loans in low-income census tracts which was below the demographic which indicated 8.2% of businesses are located in low-income census tracts. Performance was also below the aggregate's performance which made 5.1% by number and 5.4% by dollar volume of small business loans in low-income census tracts. Small business lending in 2012 was comparable to performance in 2013 as performance was below both the demographic and aggregate.

In 2013, M&T's small business lending in moderate-income census tracts was excellent. M&T originated 17.9% by number and 15.0% by dollar volume of its small business loans in moderate-income census tracts, which was above the aggregate's 11.3% by number and 11.2% by dollar volume of small business loans in moderate-income census tracts. Small business lending was above the demographics, which indicated 13.9% of businesses are located in moderate-income census tracts. Small business lending performance in 2012 was comparable to the bank's performance in 2013 in comparison to businesses with GAR of \$1 million or less as performance was below the demographic. The percentage of lending in amounts of \$100,000 or less was also below the aggregate's performance.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area reflects adequate penetration. Overall, lending to low-income borrowers, moderate-income borrowers, and small businesses was adequate.

### *Home Purchase*

Overall home purchase lending was poor based on poor distribution to LMI borrowers. Opportunities to lend to low-income borrowers were limited as the median price of a home was at least six times the income of a low-income borrower. M&T's home purchase lending to low-income borrowers was poor. M&T made 3.1% by number and 1.4% by dollar volume of its home purchase loans to low-income borrowers when 23.0% of families in the MSA assessment area are of low-income. Home purchase performance was below the performance of the aggregate which made 8.8% by number and 4.1% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2012 home purchase performance exceeded its 2013 performance but was below both the demographic and aggregate.

Home purchase lending to moderate-income borrowers was poor. M&T made 10.3% by number and 6.7% by dollar volume of its home purchase loans to moderate-income borrowers when

16.7% of families in the MSA assessment area are of moderate-income. Home purchase performance was below the aggregate which made 19.8% by number and 13.7% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance was comparable to its 2013 performance. 2012 performance was below both the demographic and aggregate.

### *Refinance*

The overall distribution of refinance loans to LMI borrowers was adequate based on adequate distribution to moderate-income borrowers and poor distribution to low-income borrowers. Performance in lending to low-income borrowers was considered poor. Opportunities to lend to low-income borrowers were limited as the median price of a home was at least six times the income of a low-income borrower. Refinance lending to low-income borrowers was poor as 3.6% of refinance loans by number and 1.9% by dollar volume were to low-income borrowers compared to 23.0% of families in the MSA assessment area which are of low-income. Performance was below the aggregate which made 6.5% by number and 2.5% by dollar volume of its refinance loans to low-income borrowers. M&T's 2012 refinance performance exceeded its 2013 performance, but was below the demographic, but above the aggregate.

Refinance lending to moderate-income borrowers was adequate. M&T made 9.7% by number and 5.7% by dollar volume of its refinance loans to moderate-income borrowers when 16.7% of families in the MSA assessment area are of moderate-income. Refinance performance was below the aggregate which made 14.3% by number and 7.1% by dollar volume of its refinance loans to moderate-income borrowers. M&T's 2012 refinance performance was comparable to its 2013 performance but below the demographic and adequate.

### *Home Improvement*

Home improvement lending to LMI borrowers was excellent. M&T made 23.2% by number and 3.2% by dollar volume of its home improvement loans to low-income borrowers when 23.0% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 12.9% by number and 4.2% by dollar volume of its home improvement loans to low-income borrowers. Home improvement performance in 2012 was comparable to 2013's performance as performance exceeded the demographic and the aggregate by number but below by dollar volume.

Home improvement lending to moderate-income borrowers was excellent. M&T made 26.3% of its home improvement loans by number and 6.5% by dollar volume to moderate-income borrowers when 16.7% of families in the MSA assessment area are of moderate-income. Home improvement performance was above the aggregate which made 18.8% by number and 10.5% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012

home improvement performance was also excellent as performance exceeded the demographic and aggregate by number, but below the aggregate by dollar volume.

*Small Business*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 44.1% by number and 30.6% by dollar volume of its small business loans to these businesses, compared to the 88.9% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was below the aggregate, which made 47.7% by number and 33.2% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 44.5% by number and 9.0% by dollar volume of its small business loans in amounts of \$100,000 or less, which was below the aggregate’s 91.8% by number and 32.9% by dollar volume of small business loans in amounts of \$100,000 or less; however, the aggregate includes credit card lenders which typically extend small dollar credit facilities. Small business lending performance in 2012 was comparable to the bank’s performance in 2013 in comparison to businesses with GAR of \$1 million or less as performance was below the demographic. The percentage of lending in amounts of \$100,000 or less was also below the aggregates performance.

**Community Development Lending**

As shown in the table to the right, M&T was a leader in community development lending in multistate MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) with 32 community development loans, totaling \$191 million or 5.3% of all community development activity. Lending was concentrated in MD 37954 (Philadelphia, PA), where 83.0% of community development lending was originated, while the remaining 17.0% was in MD 48864 (Wilmington, DE-MD-NJ). M&T ranked above six similarly-situated banks when comparing annualized community development loans to deposits within the MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area. Community development lending was responsive to identified needs within MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD).

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	10	\$38,732
Community Services	10	\$18,129
Economic Development	6	\$11,103
Revitalize and Stabilize	6	\$123,227
<b>Total</b>	<b>32</b>	<b>\$191,191</b>

In addition to the community development lending made inside the bank’s assessment area in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), M&T made \$114 million in community development loans outside of their assessment area in the MD 15804 (Camden, NJ) portion of MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD).

Examples of community development lending include:

- A \$66 million commercial mortgage to construct a 234 unit apartment complex that will help revitalize a moderate-income area in downtown Philadelphia.
- An \$11 million loan to acquire and rehabilitate affordable apartment units located in a moderate-income census tract.
- A \$1.8 million SBA 504 loan for construction of a manufacturing plant.
- An \$8.7 million loan to acquire a nursing facility that has 75.0% of all revenues provided by Medicaid.

**INVESTMENT TEST**

As shown in the table to the right, M&T’s performance in the multistate MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) under the investment test was rated outstanding. M&T made an excellent level of qualified community development investments and grants in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), with \$52 million of qualified investments dedicated to activities inside the assessment area. Total qualified investments made in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) accounted for 9.0% of M&T’s total qualified investments. Of the assessment area investments, 73.0% were new investments made in the current evaluation period. M&T’s level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$(‘000s)</b>
Affordable Housing	61	\$33,127
Community Services	198	\$18,020
Economic Development	18	\$840
Revitalize & Stabilize	1	\$3
<b>Total</b>	<b>278</b>	<b>\$51,990</b>

M&T made rare use of innovative or complex investments to support community development initiatives. Of the assessment area investments, 8.0% were made in LIHTC projects. M&T also exhibited good responsiveness to the credit and community development needs of the assessment area. Of the assessment area investments, 27.0% were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments. Of the total qualified investments made in this assessment area, \$2 million consisted of charitable donations made to community development organizations. The following are examples of qualified investments that met critical needs in the assessment area:

- A \$13 million bond that will construct an 80-unit multifamily affordable residential development in New Castle County, DE.
- A \$16 million economic development finance authority bond to an organization, located in Montgomery County, PA that provides behavioral health, residential, aftercare, and foster care services to LMI persons.

- Three grants totaling \$810,000 to an organization in New Castle County, DE that provides affordable housing, economic development, and community development services to LMI individuals throughout the State of Delaware.

**SERVICE TEST**

M&T’s performance under the service test in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) was good based on being a leader in providing community development services, delivery systems that were accessible to all portions of the assessment area, changes in branch locations that did not adversely affect accessibility, and hours and services that are tailored to the convenience and needs of the assessment area.

**Retail Services**

M&T’s delivery systems were accessible to portions of geographies and individuals of different income levels in this assessment area. M&T operated 47 branches in this assessment area, of which two (4.0%) were in low-income areas and eight (17.0%) were in moderate-income areas. This compares adequately to the demographics, which indicate 14.7% and 18.8% of the MSA’s population reside in low- and in moderate-income areas, respectively.

Alternative delivery systems slightly enhanced the bank’s performance in this MSA assessment area. M&T had 61 off-site ATM locations in the assessment area, of which one (2.0%) was located in a low-income area and nine (15.0%) were located in moderate-income areas.

The bank’s record of opening and closing branches did not adversely affect the accessibility of its delivery systems. M&T closed four branches during the evaluation period, none of which were located in an LMI tract. During the evaluation period, M&T did not open any new branches in this assessment area.

The bank’s hours and services were tailored to the convenience and needs of the assessment area, particularly LMI geographies or LMI individuals. Of the 47 branches in the MSA, 42 or 89.0% have early morning, late evening, or Saturday hours. Of the 10 branches in LMI census tracts, nine or 90.0% had extended or Saturday hours.

**Community Development Services**

As shown in the table to the right, M&T was a leader in providing of community development services in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD). The table to the right shows the number and type of services performed. The majority of the services consisted of

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	250
Financial Literacy	14
Small Business Seminars	28
Technical Assistance	1
<b>Total</b>	<b>293</b>

mortgage education seminars for LMI borrowers and first time homebuyers. In addition, management and staff served as directors and advisors to 59 nonprofit organizations in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD).



## MULTISTATE METROPOLITAN AREA

### **CRA RATING FOR MSA 35620 (NEW YORK-NORTHERN NEW JERSEY-LONG ISLAND, NY-NJ-PA)<sup>3</sup>: SATISFACTORY**

*The Lending test is rated: High Satisfactory*

*The Investment test is rated: Outstanding*

*The Service test is rated: High Satisfactory*

The major factors supporting the rating include:

- Excellent responsiveness to assessment area credit needs;
- Good geographic distribution of loans in the bank's assessment areas;
- An excellent level of qualified investments;
- A leader in making community development loans;
- Adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- Reasonably accessible delivery systems to geographies and individuals of different income levels; and
- A leader in providing community development services.

### **SCOPE OF EXAMINATION**

A full-scope review was conducted of M&T's performance in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), based on deposit concentration, lending volume, and branch office network. As shown in Exhibit I on page 10, activities in this multistate MSA made up 7.0% of the bank's deposits, 5.0% of branches, and 9.0% of the bank's loans.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 35620 (NEW YORK-NORTHERN NEW JERSEY-LONG ISLAND, NY-NJ-PA)**

As of December 31, 2013, M&T operated 35 branches, or 5.0%, of the bank's branches in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA). The area is a highly competitive market, and some of the largest financial institutions in the United States have their headquarters in this assessment area. With a deposit market share of less than 1.0%, M&T ranks 21<sup>st</sup> in deposit market share in this MSA assessment area. In addition, 9.0% of the bank's HMDA-related and small business loans are originated in this assessment area.

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<sup>3</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of the state contained within the multistate metropolitan area.

## **Community Contacts**

In order to learn more about community credit needs, examiners conducted interviews and received comments from a local nonprofit agency that is actively involved with affordable housing, and a second contact that provides funding for affordable housing and community development services.

The first contact commented that M&T is doing a good job of reinvesting its deposits in the city. According to the contact, M&T's performance in home purchase lending through its support of first time home buyer programs and its overall community development and multifamily lending programs are favorable. M&T could; however, be doing a better job of lending to community-based community development corporations.

Another contact was conducted with a nonprofit community development fund with a nationwide focus that is dedicated to serving low-income communities and people through development of affordable housing and facilities to provide the low-income communities with community services. While not specifically commenting on M&T's performance, they identified affordable housing and child care facilities to be some of the community needs that banks can help finance in the NYC areas.

## **PERFORMANCE CONTEXT**

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

### **Demographic Characteristics**

M&T's assessment area in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) includes the New York State and New Jersey portions of MD 35644 (New York-White Plains-Wayne, NY-NJ) and MD 35004 (Nassau-Suffolk, NY). According to the 2010 Census, the population of the assessment area is 12.8 million. Approximately 32.0% of the MSA assessment area population resides in LMI geographies. Of the MSA's total census tracts, 312 or 9.9% are low-income tracts and 696 or 22.0% are moderate-income tracts. The LMI geographies are concentrated in upper Manhattan, northern Brooklyn and south Bronx County.

New York City accounts for 64.0% of the assessment area population, with 8.2 million in 2010. It is the most populous city in the United States, and comprises about 43.0% of New York State's population. New York City is a very diverse area, resulting from the city historically serving as a primary point of entry into the U.S. for immigrants. The Census reports the number of foreign born people residing in New York City in 2009-2013 at slightly above three million or

37.0% of the area's total population. About 40% of New York City's three million households are non-family households, which tend to have lower incomes.

Income Characteristics

The 2010 Census indicates that 40.8% of families in the assessment area are designated as LMI and 11.4% of families live below poverty level. The 2012 and 2013 FFIEC-adjusted MFI estimates for the assessment area are shown in the table to the right.

FFIEC MEDIAN FAMILY INCOMES		
Area	2012	2013
MD 35644	\$68,300	\$66,000
MD 35004	\$107,500	\$105,900

In New York City, poverty levels are concentrated geographically with 26.0% of families living below the poverty level in Bronx County, and 19.0% of families living below the poverty level in Kings County. Therefore, community development activities that target LMI individuals and families are particularly important in New York City.

Housing Characteristics

The assessment area contains 5.1 million housing units, of which 43.5% or 2.2 million are owner-occupied, according to the 2010 Census. Of the available owner-occupied housing units, 2.0% and 13.0% are located in LMI census tracts, respectively. According to NAR, the median sales price for existing single-family homes in the MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) in 2012 was \$379,300 and increased to \$391,800 in 2013. Higher values are found in the suburban areas of the Westchester and Nassau Counties and in Manhattan (New York County).

In New York City, housing is expensive relative to income levels, causing significant affordability issues for LMI population. Most families throughout the assessment area, particularly LMI families, cannot afford to own a home because of the sharp disparity between incomes and housing costs, indicating the need to provide affordable mortgage programs and develop affordable rental properties for LMI residents. Information received from community contacts also identified the need for affordable housing in this MSA.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 668,323 businesses in 2013, of which 88.0% were small businesses with GAR of \$1 million or less. Within the assessment area, New York City is a global hub of international businesses and commerce. The city is a major center for finance, insurance, real estate and the arts in the United States. Many major corporations are headquartered in New York City, including 43 Fortune 500 companies. New York is also unique among American cities for its large number of foreign corporations. One of 10 private sector jobs in the city is with a foreign company.

As shown in the table to the right, according to the DOL, the overall unemployment rates decreased during the evaluation period. Unemployment rates varied across the bank's assessment area, but were highest in the New York City area.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 35620	8.8%	7.8%
New York City	8.5%	7.7%

Additional performance context data for this assessment area is provided in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) Assessment Area Demographics table on the next page.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 35620</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	312	9.9	314,875	10.5	116,407	37.0	736,317	24.5
Moderate-income	696	22.1	682,577	22.7	125,777	18.4	489,358	16.3
Middle-income	1,085	34.4	1,031,616	34.3	71,268	6.9	539,609	17.9
Upper-income	981	31.1	980,713	32.6	30,757	3.1	1,244,606	41.4
Unknown-income	76	2.4	109	0.0	20	18.3	0	0.0
<b>Total Assessment Area</b>	<b>3,150</b>	<b>100.0</b>	<b>3,009,890</b>	<b>100.0</b>	<b>344,229</b>	<b>11.4</b>	<b>3,009,890</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	508,412	44,184	2.0	8.7	424,785	83.6	39,443	7.8
Moderate-income	1,143,485	284,760	13.0	24.9	757,786	66.3	100,939	8.8
Middle-income	1,657,991	867,034	39.4	52.3	656,174	39.6	134,783	8.1
Upper-income	1,748,574	1,002,407	45.6	57.3	595,692	34.1	150,475	8.6
Unknown-income	494	52	0.0	10.5	351	71.1	91	18.4
<b>Total Assessment Area</b>	<b>5,058,956</b>	<b>2,198,437</b>	<b>100.0</b>	<b>43.5</b>	<b>2,434,788</b>	<b>48.1</b>	<b>425,731</b>	<b>8.4</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	38,269	5.7	33,194	5.6	2,493	4.9	2,582	8.9
Moderate-income	109,380	16.4	96,682	16.4	6,663	13.1	6,035	20.8
Middle-income	212,316	31.8	188,639	32.1	14,899	29.2	8,778	30.2
Upper-income	295,687	44.2	259,816	44.2	24,634	48.3	11,237	38.7
Unknown-income	12,671	1.9	9,899	1.7	2,353	4.6	419	1.4
<b>Total Assessment Area</b>	<b>668,323</b>	<b>100.0</b>	<b>588,230</b>	<b>100.0</b>	<b>51,042</b>	<b>100.0</b>	<b>29,051</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>88.0</b>		<b>7.6</b>		<b>4.3</b>

Based on 2010 ACS Information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE IN MSA 35620 (NEW YORK-NORTHERN NEW JERSEY-LONG ISLAND, NY-NJ-PA)**

### **LENDING TEST**

M&T's performance under the lending test in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) was good. This conclusion is based on excellent lending activity performance, good geographic distribution performance, adequate borrower distribution performance, and being a leader in making community development loans. Greater weight was given to the analysis of home purchase and small business lending performance followed by refinance and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the evaluation of community development lending, and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) reflect excellent responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volume compared to the prior evaluation, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending volume was significantly above the aggregate lending volume in this MSA.

M&T's market share of deposits was stable while lending in the assessment area increased. In 2013, M&T had a deposit market share of less than 1.0%, and lending market shares of 1.0% in home purchase lending and less than 1.0% in refinance, home improvement and small business lending. In comparison, during the last evaluation, the deposit market share was also less than 1.0%, and lending market share was 1.0% in home purchase lending and less than 1.0% in refinance, home improvement and small business lending.

HMDA and small business volumes for the evaluation period increased by 60.0% compared to the last evaluation. This increase was driven primarily by increases in home purchase (38.0%), refinance (61.0%), home improvement (51.0%) and small business (13.0%) loan volumes. Comparison to the aggregate data for the evaluation period indicated an overall increase in lending volume. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T outperformed similarly-situated banks.

### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration in the multistate MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-

PA) assessment area. Lending penetration in LMI geographies was excellent for home purchase and refinance, good for home improvement lending, and poor for small business lending.

During the evaluation period M&T originated loans in only 41.8% of the census tracts within the assessment area. As shown in the table below, low-income census tracts had the greatest percentage of tracts without loans. In 2012 and 2013, M&T originated loans in 63 of 312 (20.2%) low-income census tracts and 227 of 696 (32.6%) moderate-income census tracts. According to the 2010 Census data, approximately 10.5% of families reside in low-income tracts and 10.0% of housing units are in low-income tracts. The owner-occupancy rate for low-income tracts was 2.0%, 83.6% of all housing units are rental units, and the poverty rate for low-income tracts was 37.0%. Data from the 2010 Census also indicates that 22.6% of all housing units are in moderate-income tracts and that 22.7% of all families reside in moderate-income tracts. The owner-occupancy rate for moderate-income tracts was 13.0%, and 48.1% of all housing units are rental units. Therefore, opportunities to originate residential loans in LMI tracts are limited. The table below details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	312	249	20%
Moderate	696	469	33%
Middle	1085	601	45%
Upper	981	443	55%
<b>2012</b>			
Low	312	261	16%
Moderate	696	493	29%
Middle	1085	640	41%
Upper	981	471	52%

### *Home Purchase*

The overall distribution of home purchase loans in LMI census tracts was excellent based on excellent lending in LMI census tracts. M&T's home purchase lending in low-income census tracts was excellent. In 2013, M&T made 6.7% by number and 2.7% by dollar volume of its home purchase loans in low-income tracts which was above the demographic which indicates that 2.0% of owner-occupied housing units are located in low-income census tracts. Performance was above the performance of the aggregate which made 2.5% by number and 2.3% by dollar volume of its home purchase loans in low-income census tracts. Home purchase lending performance in 2012 was comparable to 2013's performance as performance exceeded the demographic and aggregate.

Home purchase lending in moderate-income census tracts was excellent. In 2013, M&T made 26.1% by number and 9.3% by dollar volume of its home purchase loans in moderate-income census tracts which were above the demographics which indicated 13.0% of owner-occupied housing units were in moderate-income census tracts. M&T's home purchase performance also was above the aggregate which made 13.0% by number 10.4% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase lending in 2012 was comparable to 2013's performance as performance was above both the demographic and aggregate.

### *Refinance*

The overall distribution of refinance loans in LMI census tracts was excellent based on excellent lending in low-income census tracts and good lending in moderate-income census tracts. Refinance lending in low-income census tracts was excellent. In 2013, M&T made 2.6% by number and 3.2% by dollar volume of its refinance loans in low-income census tracts which were above the demographic which indicated 2.0% of owner occupied-housing units were located in low-income census tracts. Performance was also above the aggregate which made 1.5% by number and 1.9% by dollar volume of its refinance loans in low-income census tracts. Refinance lending in 2012 was below 2013's performance as performance was below the demographic but exceeded the aggregate.

M&T's refinance lending in moderate-income census tracts was good. In 2013, M&T made 12.8% by number and 10.8% by dollar volume of its refinance loans in moderate-income census tracts which were similar to the 13.0% of owner-occupied housing units located in moderate-income census tracts. M&T's refinance performance was also above the aggregate which made 9.6% of its refinance loans in moderate-income census tracts. Refinance lending in 2013 exceeded 2012's performance as 2012's performance was below demographic but above the aggregate.

### *Home Improvement*

The overall distribution of home improvement loans in LMI census tracts was good based on excellent lending in LMI census tracts in 2013 and poor lending in LMI census tracts in 2012. Home improvement lending in low-income census tracts was good. In 2013, M&T made 6.3% by number and 1.4% by dollar volume of its home improvement loans in low-income census tracts. Home improvement performance was above the demographic which indicated 2.0% of owner-occupied housing units were located in low-income census tracts and also above the aggregate which made 1.8% by number and 1.5% by dollar volume in low-income census tracts. Performance in 2012 was poor as M&T did not make any home improvement loans in low-income census tracts.

Home improvement lending in moderate-income census tracts was good. In 2013, M&T made 17.2% by number and 58.6% by dollar volume of its home improvement loans in moderate-



income census tracts. Performance was above the demographics of the assessment area, which indicate that 13.0% of the available owner-occupied housing units are located in moderate-income census tracts. M&T's performance was also above the aggregate which made 11.3% by number and 10.0% by dollar volume in moderate-income census tracts. Home improvement lending in 2012 was below 2013's performance as only three loans were made in moderate-income census tracts.

### *Small Business*

The overall distribution of small business loans in LMI census tracts was poor based on adequate lending in low-income census tracts and poor lending in moderate-income census tracts. In 2013, M&T's small business lending in low-income census tracts was adequate. M&T originated 3.2% by number and 2.5% by dollar volume of its small business loans in low-income census tracts which was below the demographic that indicated 5.7% of businesses are located in low-income census tracts. Performance was also below the aggregate's performance which made 5.5% by number and 4.7% by dollar volume of small business loans in low-income census tracts. Small business lending in 2012 was comparable to performance in 2013 as performance was below both the demographic and aggregate.

In 2013, M&T's small business lending in moderate-income census tracts was poor. M&T originated 8.7% by number and 9.7% by dollar volume of its small business loans in moderate-income census tracts. Small business performance was below aggregate's 14.3% by number and 14.3% by dollar volume of small business loans in moderate-income census tracts and was also below the demographics, which indicated 16.4% of businesses are located in moderate-income census tracts. Small business lending in 2012 was comparable to performance in 2013 as performance was below both the demographic and aggregate.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) assessment area reflects adequate penetration. Overall, lending to low-income borrowers was poor while lending to moderate-income borrowers and small businesses was adequate. Within the MSA there is a wide disparity between housing prices and income. As reported by NAR the median housing price in 2013 was 12 times the income of a low-income individual and seven times the income of a moderate-income individual making it difficult to afford a home. It is noted that within this assessment area a substantial portion of the bank's HMDA loans did not have reported income for home purchase and refinance loans.

### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was excellent based on excellent lending to moderate-income borrowers and adequate lending to low-income borrowers

considering the performance context. M&T's home purchase lending to low-income borrowers was adequate. M&T made 3.7% by number and 0.6% by dollar volume of its home purchase loans to low-income borrowers when 24.5% of families in the MSA assessment area are of low-income. Home purchase performance was above the performance of the aggregate which made 2.0% by number and 0.7% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2013 home purchase performance was comparable to its 2012 performance as 2012's performance was below the demographic but above the aggregate.

Home purchase lending to moderate-income borrowers was excellent. M&T made 16.7% by number and 3.2% by dollar volume of its home purchase loans to moderate-income borrowers when 16.3% of families in the MSA assessment area are of moderate-income. Home purchase performance was above the aggregate which made 11.3% by number and 5.6% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance was below its 2013 performance as performance was below the demographic but comparable to the aggregate.

### *Refinance*

The overall distribution of refinance loans to LMI borrowers was poor based on poor distribution to LMI borrowers. Opportunities for refinance lending to LMI borrowers was impacted by the high cost of housing in relation to income as the median cost of a home was at least 12 times the income of a low-income borrower and seven times the income of a moderate-income borrower. In 2013, refinance lending to low-income borrowers was poor as 1.1% by number and 0.4% by dollar volume of refinance loans were to low-income borrowers compared to the 24.5% of families in the MSA assessment area which are of low-income. Performance was below the aggregate which made 3.5% by number and 1.5% by dollar volume of its refinance loans to low-income borrowers. M&T's 2012 refinance performance was comparable to its 2013 performance. Performance was below both the demographic and aggregate.

Refinance lending to moderate-income borrowers was poor. M&T made 5.0% by number and 2.1% by dollar volume of its refinance loans to moderate-income borrowers when 16.3% of families in the MSA assessment area are of moderate-income. Refinance performance was below the aggregate which made 8.9% by number and 4.0% by dollar volume of its refinance loans to moderate-income borrowers. M&T's 2012 refinance performance was comparable to its 2013 performance as performance was below both the demographic and aggregate.

### *Home Improvement*

The overall distribution of home improvement loans to LMI borrowers was adequate based on adequate distribution to LMI borrowers. M&T's home improvement lending to low-income borrowers was adequate. M&T made 7.8% by number and 0.1% by dollar volume of its home improvement loans to low-income borrowers when 24.5% of families in the MSA assessment

area are of low-income. Home improvement performance was above the performance of the aggregate which made 4.6% by number and 1.5% by dollar volume to low-income borrowers. Home improvement performance in 2012 was comparable to 2013's performance as performance was below the demographic, but above the aggregate.

Home improvement lending to moderate-income borrowers was adequate. M&T made 10.9% by number and 0.2% by dollar volume of its home improvement loans to moderate-income borrowers when 16.3% of families in the MSA assessment area are of moderate-income. Home improvement performance was below the aggregate which made 12.7% by number and 5.7% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012 home improvement performance was also adequate as performance was below both the demographic and aggregate.

*Small Business*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 40.8% by number and 29.1% by dollar volume of its small business loans to these businesses, compared to the 88.0% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was below the aggregate, which made 43.6% by number and 30.9% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 40.2% of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 94.9% of small business loans amounts of \$100,000 or less; however, the aggregate includes credit card lenders which typically make small dollar credit facilities. Small business lending performance in 2012 was comparable to the bank's performance in 2013 as the percentage of loans to businesses with GAR of \$1 million or less was below the demographic but exceeded the aggregate. In 2012, 44.5% of small business loans were in amounts of \$100,000 or less compared to the aggregate's 95.5%.

**Community Development Lending**

The community development lending activities detailed in the table to the right indicated that M&T was a leader in community development lending in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) with community development loans totaling \$903 million or 25.6% by dollar volume of the bank's

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	66	\$283,684
Community Services	56	\$424,690
Economic Development	8	\$26,171
Revitalize and Stabilize	17	\$168,031
<b>Total</b>	<b>147</b>	<b>\$902,576</b>

community development lending in its assessment areas. Eighty-two percent of the community development lending was in MD 35644 (New York-White Plains-Wayne, NY-NJ) while 18.0% was in MD 35004 (Nassau-Suffolk, NY). M&T ranked favorably among seven similarly-

situated banks when comparing annualized community development loans to deposits within the MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) assessment area.

Performance within the MSA was largely attributed to community service and affordable housing initiatives, which community contacts identified as a critical need in the assessment area. Affordable housing represented 31.0% of community development lending activity within the MSA, community service initiatives was 47.0%, economic development was 3.0%, and revitalization and stabilization was 19.0%.

Examples of community development lending initiatives included:

- A \$12 million loan to acquire a 175 bed skilled nursing facility. Revenues from Medicaid have been in excess of 80.0% of total revenues for the past three years.
- A \$20 million loan for conversion of a vacant hotel into a 216 unit homeless shelter for families in Queens County, NY.
- A \$5 million loan to an operator of transitional housing for the homeless.
- A \$47 million loan to assist in revitalizing parts of Brooklyn through the acquisition and rehabilitation of 16 acres land from a former factory site. The property is to be developed with multifamily housing both affordable and market rate.

## INVESTMENT TEST

M&T's performance in the multistate MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) under the investment test was rated outstanding. As shown in the table to the right, M&T made an excellent level of qualified community development investments and grants in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA), with \$45 million of qualified investments dedicated to activities inside the assessment area. Total qualified investments made in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) accounted for 7.8% of M&T's total qualified investments. Of the assessment area investments, \$31 million or 69.0% were new investments made in the current evaluation period while \$14 million were prior period investments. M&T's level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	77	\$21,635
Community Services	66	\$23,048
Economic Development	20	\$143
Revitalize & Stabilize	19	\$73
<b>Total</b>	<b>182</b>	<b>\$44,899</b>

M&T made occasional use of complex investments to support community development initiatives, with 21.0% of assessment area investments made in LIHTC projects. M&T also exhibited good responsiveness to the credit and community development needs of the assessment

area. Of the assessment area investments, 24.0% were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments. Of the total qualified investments made in this assessment area, \$2 million consisted of charitable donations made to community development organizations. The following are examples of qualified investments that met critical needs in the assessment area:

- Seven deposits totaling \$800,000 to credit unions that provide low-cost financial services to LMI individuals.
- A \$7 million tax-exempt bond to refinance bonds originally issued to a medical facility located in Suffolk County, NY that primarily serves LMI individuals and receives a majority of funding through Medicaid.
- A total of \$695,000 of direct grants was made through the bank's Banking Partnership for Community Development grant program. Grants were awarded to numerous community development corporations involved with housing or economic development and were located in and served LMI communities throughout the assessment area.

## **SERVICE TEST**

M&T's performance under the service test in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) was good based on being a leader in providing community development services, delivery systems that were reasonably accessible to all portions of the assessment area, changes in branch locations that did not adversely affect accessibility and hours, and services that do not vary in a way that inconveniences the needs of the assessment area.

### **Retail Services**

M&T's delivery systems were reasonably accessible to portions of geographies and individuals of different income levels in this assessment area. M&T operated 35 branches in this assessment area, of which none were in low-income areas and four (11.0%) were in moderate-income areas, in comparison to 11.0% and 24.0% of the MSA's population residing in LMI.

Alternative delivery systems did not enhance the bank's performance in this assessment area group. M&T had six off-site ATM locations in the assessment area, none of which were located in LMI areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T closed one branch in an upper-income census tract in this assessment area.

The bank's hours and services did not vary in a way that inconveniences the assessment area, including LMI geographies or LMI individuals. Of the 35 branches in the MSA, 23 or 66.0%

have early morning, late evening, or Saturday hours. Of the four branches in LMI census tracts, two or 50.0% had extended or Saturday hours.

### Community Development Services

M&T was a leader in providing community development services in the MSA during the evaluation period. The table to the right provides details regarding the level and type of services offered. The majority of the services consisted of mortgage education seminars for LMI borrowers and first time homebuyers. In addition, management and staff served as directors, advisors or committee members to 28 nonprofit and community based organizations in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA).

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	257
Financial Literacy	3
Small Business Seminars	10
Technical Assistance	1
<b>Total</b>	<b>271</b>

## MULTISTATE METROPOLITAN AREA

***CRA RATING FOR MSA 47900 (WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-WV)<sup>4</sup>: OUTSTANDING***

***The Lending test is rated: Outstanding***

***The Investment test is rated: Outstanding***

***The Service test is rated: Outstanding***

The major factors supporting the rating include:

- A leader in making community development loans;
- An excellent level of qualified community development investments;
- Excellent geographic distribution of loans in the bank's assessment area;
- Excellent responsiveness to assessment area credit needs;
- Adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- Readily accessible delivery systems to geographies and individuals of different income levels;
- A record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals;
- The bank's business hours and services do not vary in a way that inconveniences any portions of the assessment areas; and
- A leader in providing community development services.

### SCOPE OF EXAMINATION

A full-scope review was conducted of M&T's performance in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) based on deposit concentration, lending volume, and branch office network. As shown in Exhibit I on page 10, activities in this multistate MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) made up 6.0% of the bank's deposits and 11.0% of branches, and 9.0% of the bank's loans.

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<sup>4</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of the state contained within the multistate metropolitan area.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 47900 (WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-WV)**

As of December 31, 2013, M&T had 77 branches in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), representing 11.0% of the bank's branches. The bank generated 6.0% of deposits and extended 9.0% of HMDA-related and small business loans in the MSA during the evaluation period.

M&T is the 11<sup>th</sup> largest bank in the assessment area in terms of deposits, with a 2.0% market share as of June 30, 2013. This assessment area is a competitive marketplace where large regional banks compete. Some of M&T's primary competitors in this assessment area are PNC Bank, Bank of America, NA, Citibank, NA, HSBC Bank USA, and EagleBank.

### **Community Contacts**

Three community contacts were conducted to discuss local economic conditions and community needs. One contact familiar with economic development and revitalization noted that while the economy is flourishing, some communities continue to grow at a slower pace and face budgetary constraints. The contact also stated that the community would benefit from additional funding sources to meet the redevelopment needs of the core business corridor in the metropolitan area.

Another contact with a nonprofit organization committed to small business development noted that start-ups and newer businesses are seeking financing to grow their businesses. The contact also noted the need for financial education and that several local institutions are actively participating in workshops designed for small businesses.

A third contact with an affordable housing official indicated that there are several housing projects underway that need additional financial support. Within the market area the contact indicated that opportunities for community development loans and investments are considerable.

## **PERFORMANCE CONTEXT**

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

### **Demographic Characteristics**

M&T's MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area consists of the entire MD 13644 (Bethesda-Frederick-Rockville, MD) and portions of MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV) which include: Alexandria City, Arlington County, Fairfax County, Fairfax City, Falls Church City, Fredericksburg City, Loudoun County, Manassas City, Manassas Park City, Prince William County, and Spotsylvania



County in the State of Virginia; Prince George’s County, Calvert County, and Charles County in the State of Maryland; and the District of Columbia. According to the 2010 Census, the population of the assessment area was approximately 5.3 million, with Washington, DC being the urban hub, making it the fifth largest metropolitan area in the United States. Between 2000 and 2010, the region grew by more than 16.0% adding almost 786,000 new residents.

Income Characteristics

MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) is the highest income MSA in the country, with Loudon and Fairfax Counties having the first and third highest median household incomes in the nation. The MFI for individual jurisdictions varies significantly throughout the region, from \$61,950 in Fredericksburg to over \$133,000 in Loudon County and Arlington County. As shown in the table above, the MFI was almost stable over the evaluation period.

FFIEC MEDIAN FAMILY INCOMES		
Area	2012	2013
MD 13644	\$113,400	\$112,200
MD 47894	\$105,700	\$105,900

MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) has some of the most affluent communities in the country, but it also has some of the worst pockets of poverty, particularly in the District of Columbia. Additionally, there has been an increase in suburban poverty recently.

Additional performance context data for this assessment area is provided in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) Assessment Area Demographics table on the next page.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 47900</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	120	9.4	92,222	7.5	18,742	20.3	259,855	21.1
Moderate-income	316	24.7	275,878	22.4	20,422	7.4	213,946	17.3
Middle-income	440	34.4	453,162	36.7	14,522	3.2	261,260	21.2
Upper-income	390	30.5	412,213	33.4	6,791	1.6	498,479	40.4
Unknown-income	13	1.0	65	0.0	65	100.0	0	0.0
<b>Total Assessment Area</b>	<b>1,279</b>	<b>100.0</b>	<b>1,233,540</b>	<b>100.0</b>	<b>60,542</b>	<b>4.9</b>	<b>1,233,540</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	188,212	47,689	3.8	25.3	117,645	62.5	22,878	12.2
Moderate-income	512,819	241,170	19.2	47.0	224,778	43.8	46,871	9.1
Middle-income	731,809	497,939	39.7	68.0	186,470	25.5	47,400	6.5
Upper-income	635,834	467,845	37.3	73.6	129,355	20.3	38,634	6.1
Unknown-income	224	32	0.0	14.3	133	59.4	59	26.3
<b>Total Assessment Area</b>	<b>2,068,898</b>	<b>1,254,675</b>	<b>100.0</b>	<b>60.6</b>	<b>658,381</b>	<b>31.8</b>	<b>155,842</b>	<b>7.5</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	14,016	4.7	12,480	4.7	963	4.5	573	5.8
Moderate-income	61,010	20.5	53,702	20.2	4,801	22.3	2,507	25.4
Middle-income	103,315	34.8	92,961	35.0	7,044	32.7	3,310	33.5
Upper-income	118,016	39.7	106,032	39.9	8,635	40.1	3,349	33.9
Unknown-income	726	0.2	483	0.2	108	0.5	135	1.4
<b>Total Assessment Area</b>	<b>297,083</b>	<b>100.0</b>	<b>265,658</b>	<b>100.0</b>	<b>21,551</b>	<b>100.0</b>	<b>9,874</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.4</b>		<b>7.3</b>		<b>3.3</b>

Based on 2010 ACS Information.

### Housing Characteristics

MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) was hit hard by the housing market collapse, but recovery started earlier and has been stronger than in other major metropolitan areas. Starting in 2006, the region saw a significant decline in new construction, falling home prices and rising foreclosures. However, by 2009, the market was already beginning to stabilize, while the housing market in many other areas continued to decline. The Washington,

DC housing market was somewhat insulated from the economic trends impacting the rest of country due to the heavy dependence on the federal government for jobs and spending. The 2010 Census reports that the assessment area has approximately 2.1 million housing units, of which 1.3 million units or 61.0% are owner-occupied, 32.0% are rental, and 7.0% are vacant. Approximately, 23.0% of all owner-occupied units in the MSA are located in LMI census tracts.

Home prices dropped significantly at the start of the recession, but since 2009, they have been rebounding across the metro area. As shown in the table to the right, according to NAR, the median home price in the assessment area steadily increased over the course of the evaluation period. The largest increases in the median home prices occurred in Montgomery and Prince George’s Counties in Maryland. The highest median home price in the region as of April 2013 was in Falls Church City at \$589,000. Prince George’s County was the most affordable area with a median home price of \$185,000.

<b>MEDIAN HOME PRICE</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 47900	\$352,000	\$381,900

Housing affordability is a major concern in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) for both homeowners and renters. A recent survey indicated that Washington, DC is the least affordable housing market among 30 major metro areas in the US, with the median housing price more than 16 times the median income. The supply of affordable housing is limited, and due to the strong demand, landlords are looking at converting units to market rate rents. There is a great need to stabilize and preserve rental units in LMI areas and to provide rehabilitation assistance to owners of older homes to insure the limited supply of affordable housing remains within the MSA.

*Labor, Employment and Economic Characteristics*

According to Dun & Bradstreet data, the assessment area had a total of 297,083 businesses in 2013, of which 89.4% were small businesses with GAR of \$1 million or less. The Washington, DC region currently has one of the healthiest economies in the country. The area economy depends on local and federal government as well as the service, retail trade, systems integration, telecommunications, and biotechnology industries.

Employment in the Washington, DC region held up relatively well during the most recent recession, and though unemployment doubled, it remained well below the unemployment rate in other big metro areas in the US. As shown in the table to the right, the unemployment rate in all jurisdictions in the MSA improved steadily over the course of the evaluation period.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 47900	5.7%	5.4%
District of Columbia	9.1%	8.3%
State of Maryland	6.9%	6.6%
Commonwealth of Virginia	5.9%	5.5%

The Washington, DC region's economic resilience is largely due to federal government employment, which actually expanded during the downturn. But every sector of the economy has held up better in the Washington, DC region than for the US on average. Although the economy of the Washington, DC area has historically been heavily dependent on the federal government, over the past several decades, the economy has become more diverse, with growth in the professional and business services sector as well as the health and education sector. Some of the largest employers include Lockheed Martin, Northrop Grumman, SAIC, Inova Health System, Verizon Communications, Booz Allen Hamilton, MedStar Health, Marriott International, and Computer Sciences Corporation.

Economic development efforts in the Greater Washington, DC region are focused on further diversification of the economy in order to limit the impact of declining federal spending as the result of the sequestration and other fiscal policies. In the past few years, the region has attracted a number of new corporate headquarters, including CSC, the Volkswagen Group of America, Hilton Worldwide, SAIC, and Northrop Grumman. One initiative underway to address the region's economic competitiveness in light of declining federal spending is the Metro Washington Council of Government's Economy Forward plan. This plan calls for the region to think beyond the federal government and encourages greater regional collaboration to improve housing, employment, workforce development, and transportation as the region works to redefine its image as more than a government town.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE IN MSA 47900 (WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-WV)**

### **LENDING TEST**

M&T's performance under the lending test in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) was excellent. This conclusion is based on excellent lending activity performance, excellent geographic distribution performance, and adequate borrower distribution performance. M&T was also a leader in making community development loans. Greater weight was given to the analysis of refinance and small business lending performance followed by home purchase and home improvement lending in the analysis of geographic and borrower distribution based on the volume of lending by number of loans. Multifamily lending was only considered in the evaluation of community development lending, and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) reflect excellent responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volume compared to the prior evaluation, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of

all lenders in the assessment area indicated that M&T's lending activity was significantly above the aggregate's lending activity.

M&T's market share of lending increased in comparison to the last evaluation, with the exception of home improvement and small business lending which decreased. In 2013, M&T had deposit market share of 2.0%, and lending market share of 0.63% in home purchase lending, 0.56% in refinance lending, 1.0% in home improvement lending, and 0.71% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was also 2.0%, and lending market share was 0.42% in home purchase lending, 0.23% in refinance lending, 2.0% in home improvement lending, and 0.86% in small business lending.

HMDA and small business volumes for the evaluation period increased by 60.0% compared to the last evaluation. This increase was driven by increases in home purchase (65.0%) and refinance (163.0%) loan volumes; partially offset by decreased home improvement (-8.0%) loan volumes. The increase in small business loan volume was immaterial (0.08%). Comparisons to the aggregate data for the evaluation period indicated overall increased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was consistent with the lending volume of similarly-situated banks.

### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects excellent penetration in the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) multistate assessment area. Lending penetration in LMI census tracts was excellent for home purchase, refinance, and small business lending, and good for home improvement lending.

During the evaluation period, M&T originated loans in a majority of the census tracts within the assessment area, while low-income tracts had the largest percentage of tracts without loans. According to the 2010 Census data, approximately 7.5% of families reside in low-income tracts and only 25.3% of the housing units in low-income tracts are owner-occupied. Additionally, 20.3% of families residing in the low-income tracts have incomes below the poverty level. Opportunities to originate mortgage loans are therefore limited in low-income tracts. Data from the 2010 Census also indicates that 19.2% of all owner-occupied housing units are in moderate-income tracts and that 22.4% of all families reside in moderate-income tracts. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	120	57	53%
Moderate	316	78	75%
Middle	440	85	81%
Upper	390	124	68%
<b>2012</b>			
Low	120	68	43%
Moderate	316	97	69%
Low	440	108	75%
Moderate	390	108	72%

### *Home Purchase*

M&T's home purchase lending in LMI census tracts was excellent. In 2013, M&T made 5.4% by number and 4.7% by dollar volume of its home purchase loans in low-income tracts which was above the demographic which indicates that 3.8% of owner-occupied housing units were located in low-income census tracts and above the performance of the aggregate which made 3.8% by number and 2.8% by dollar volume of its home purchase loans in low-income census tracts. Home purchase lending performance in 2012 was comparable to 2013's performance as performance exceeded both the demographic and aggregate.

Home purchase lending in moderate-income census tracts was excellent. In 2013, M&T made 29.4% by number and 26.9% by dollar volume of its home purchase loans in moderate-income census tracts. Performance was above the demographics which indicated that 19.2% of owner-occupied housing units were located in moderate-income census tracts. Home purchase performance was also above the aggregate which made 17.9% by number and 13.2% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase lending in 2012 was comparable to 2013.

### *Refinance*

The overall distribution of refinance loans in LMI census tracts was excellent based on excellent distribution in moderate-income tracts and good distribution in low-income tracts. Refinance lending in low-income census tracts was good. In 2013, M&T made 3.8% by number and 3.0% by dollar volume of its refinance loans in low-income census tracts which was similar to the demographics which indicated that 3.8% of owner occupied-housing units were located in low-income census tracts. Refinance performance is similar to the aggregate's performance which made 3.2% by number and 3.0% by dollar volume of its refinance loans in low-income census tracts. Refinance lending in 2012 was comparable to 2013's performance as performance was comparable to the demographic and above the aggregate.

M&T's refinance lending in moderate-income census tracts was excellent. In 2013, M&T made 23.7% by number and 19.1% by dollar volume of its refinance loans in moderate-income census tracts. Refinance performance was above the demographics which indicated that 19.2% of owner-occupied housing units were located in moderate-income census tracts. Refinance performance was also above the aggregate which made 16.1% by number and 13.5% by dollar volume in moderate-income census tracts. Refinance lending in 2012 was comparable to 2013's performance as performance was above both demographic and aggregate.

### *Home Improvement*

The overall distribution of home improvement loans in LMI tracts was good based on excellent distribution in moderate-income census tracts and poor distribution in low-income census tracts. Home improvement lending in low-income census tracts was poor. In 2013, M&T made 2.2% by number and less than 1.0% by dollar volume of its home improvement loans in low-income census tracts. Home improvement performance was below the demographics which indicated 3.8% of owner-occupied housing units were located in low-income census tracts. Home improvement performance was also below the aggregate which made 4.4% by number and 2.6% by dollar volume of its home improvement loans in low-income census tracts. In 2012, M&T did not make any home improvement loans in low-income census tracts.

Home improvement lending in moderate-income census tracts was excellent. The bank's home improvement lending was above the demographics of the assessment area, which indicate that 19.2% of the available owner-occupied housing units are located in moderate-income census tracts compared to the bank's 27.8% by number and 26.1% by dollar volume. Home improvement performance was also above the aggregate which made 20.1% by number and 12.7% by dollar volume of its home improvement loans in moderate-income census tracts. Home improvement lending in 2012 was comparable to 2013's performance as performance exceeded both the demographic and the aggregate.

### *Small Business*

The overall distribution of small business loans in LMI census tracts was excellent. In 2013, M&T's small business lending in low-income census tracts was good. M&T originated 3.7% by number and 2.2% by dollar volume of its small business loans in low-income census tracts which was below the demographic, which indicates that 4.7% of businesses are located in low-income census tracts. Performance was also similar to the aggregate's performance which made 3.7% by number and 3.5% by dollar volume of small business loans in low-income census tracts. Small business lending in 2012 was comparable to performance in 2013.

In 2013, M&T's small business lending in moderate-income census tracts was excellent. M&T originated 24.3% by number and 27.3% by dollar volume of its small business loans in moderate-income census tracts. Performance was above the aggregate's 18.3% by number and 18.3% by dollar volume. Small business lending was also above the demographics, which

indicates that 20.5% of businesses are located in moderate-income census tracts. Small business lending in 2012 was comparable to performance in 2013.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area reflects adequate penetration. Overall, lending to low-income borrowers was poor while lending to moderate-income borrowers and small businesses was adequate. Within the MSA there is a wide disparity between housing prices and income. As reported by NAR, the median housing price in 2013 was seven times the income of a low-income individual and 4.5 times the income of a moderate-income individual making it difficult to afford a home.

#### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was adequate based on poor distribution to low-income borrowers and adequate distribution to moderate-income borrowers. M&T's home purchase lending to low-income borrowers was poor. M&T made 5.5% by number and 3.0% by dollar volume of its home purchase loans to low-income borrowers when 21.1% of families in the MSA assessment area are of low-income. Home purchase performance was below the performance of the aggregate which made 9.3% by number and 4.4% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2013 home purchase performance was comparable to its 2012 performance.

Home purchase lending to moderate-income borrowers was adequate. M&T made 11.1% by number and 9.2% by dollar volume of its home purchase loans to moderate-income borrowers when 17.3% of families in the MSA assessment area are of moderate-income. Home purchase performance was below the aggregate which made 19.1% by number and 13.7% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance was comparable to its 2013 performance as performance was below both the demographic and aggregate.

#### *Refinance*

The overall distribution of refinance loans to LMI borrowers was adequate based on poor distribution to low-income borrowers and adequate distribution to moderate-income borrowers. Refinance lending to low-income borrowers was poor as 4.7% by number and 2.5% by dollar volume of refinance loans were to low-income borrowers compared to 21.1% of families in the MSA assessment area which are of low-income. Performance however, was below the aggregate which made 7.6% by number and 3.7% by dollar volume of its refinance loans to low-income borrowers. M&T's 2012 refinance performance was comparable to its 2013 performance.



Refinance lending to moderate-income borrowers was adequate. M&T made 9.8% by number and 7.5% by dollar volume of its refinance loans to moderate-income borrowers when 17.3% of families in the MSA assessment area are of moderate-income. Refinance performance was below the aggregate which made 14.9% by number and 9.6% by dollar volume of its refinance loans to moderate-income borrowers. M&T's 2012 refinance performance was comparable to its 2013 performance.

#### *Home Improvement*

M&T's home improvement lending to LMI borrowers was excellent. M&T made 26.7% by number and 10.9% by dollar volume of its home improvement loans to low-income borrowers when 21.1% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 13.5% by number and 5.0% by dollar volume to low-income borrowers. Home improvement performance in 2012 was below its 2013 performance as performance was below the demographic but above the aggregate.

Home improvement lending to moderate-income borrowers was excellent. M&T made 26.7% by number and 17.3% by dollar volume of its home improvement loans to moderate-income borrowers when 17.3% of families in the MSA assessment area are of moderate-income. Home improvement performance was above the aggregate which made 20.7% by number and 11.7% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent as performance exceeded both the demographic and the aggregate.

#### *Small Business*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 53.4% by number and 39.7% by dollar volume of its small business loans to these businesses, compared to the 89.4% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 51.6% by number and 33.3% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 51.9% of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 92.6% of small business loans in amounts of \$100,000 or less; however, the aggregate includes credit card lenders which typically make small dollar credit facilities. Small business lending performance in 2012 was comparable to the bank's performance in 2013 as the percentage of loans to businesses with GAR of \$1 million or less was below the demographic but exceeded the aggregate. In 2012, 58.4% of small business loans were in amounts of \$100,000 or less compared to the aggregate's 95.5%.

### Community Development Lending

As shown in the table to the right, M&T was a leader in making community development lending in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), with 51 community development loans totaling \$355.9 million. This represented 9.8% of the bank's community development lending. Lending efforts were in all areas of the MSA with 33.9% in the District of Columbia, 40.0% in Maryland, and 26.0% in the Virginia portions of the MSA. M&T ranked on top of seven similarly-situated banks when comparing annualized community development loans to deposits within the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	18	\$84,630
Community Services	22	\$117,753
Economic Development	7	\$22,145
Revitalize and Stabilize	4	\$131,380
<b>Total</b>	<b>51</b>	<b>\$355,908</b>

Lending efforts supported all areas of community development in the MSA with 33.0% by dollar targeting community service activity and 36.9% revitalization and stabilization of LMI areas.

Examples of community development initiatives included but were not limited to:

- An \$8.2 million loan representing 54 units of affordable housing as part of a \$52 million loan facility to construct 342 units of mixed-income housing in Virginia.
- A \$7.6 million loan for working capital to an SBA 8a certified small business entity that focuses on government contracts.
- A \$10 million loan for renovations of 198 units of affordable housing.
- A \$3 million loan to an economic development agency to support a project designed to create jobs and revitalize a moderate-income area in Maryland.

### INVESTMENT TEST

M&T's performance in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) under the investment test was rated outstanding. M&T made an excellent level of qualified community development investments and grants in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), with \$44.7 million of qualified investments dedicated to activities inside MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), as shown in the table to the right. Total qualified investments made in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) accounted for 8.0% of the bank's total qualified investments. In addition, \$21 million or 47.0% of the assessment area investments

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	46	\$36,260
Community Services	67	\$8,443
Economic Development	2	\$3
Revitalize & Stabilize	1	\$5
<b>Total</b>	<b>116</b>	<b>\$44,711</b>

were new investments made in the current evaluation period. M&T's level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

M&T made extensive use of complex investments to support community development initiatives through investments in LIHTCs, totaling 55.0% of total assessment area investments. M&T exhibited good responsiveness to the credit and community development needs in the assessment area. Investment activities primarily targeted affordable housing projects for LMI individuals. Of the assessment area investments, 26.0% or \$12 million were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments. The following are examples of qualified investments that met critical needs in the assessment area:

- An \$8 million LIHTC project in the District of Columbia that will construct two buildings with 150 rental units, of which 80.0% which will be rented to LMI individuals earning 60.0% of MFI.
- A \$3 million school construction bond to support a public charter school in the District of Columbia located in a moderate-income tract. A majority of the students qualify for free or reduced lunch.
- Multiple grants totaling \$474,000 to organizations that support various community development activities throughout this assessment area.

## **SERVICE TEST**

M&T's performance under the service test in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) was excellent based on delivery systems that were readily accessible to all portions of the assessment area, changes in branch locations that did not adversely affect accessibility, hours and services that are tailored to the convenience and needs of the assessment area, and being a leader in providing community development services.

## **Retail Services**

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated 77 branches in this assessment area, of which four (5.2%) of the total branches were in a low-income area and 25 (32.5%) were in moderate-income areas. This compares favorably to the 9.0% and 24.0% of the MSA's population residing in low- and moderate-income areas, respectively.

Alternative delivery systems enhanced the bank's performance in this assessment area. M&T had 71 off-site ATM locations in the assessment area, of which one (1.4%) was located in a low-income area and 28 (39.4%) were located in moderate-income areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T opened two branches, one of which was located in an LMI tract. M&T closed 23 branches in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), of which nine were in moderate-income census tracts.

The bank's hours and services were tailored to the convenience and needs of the assessment area, including LMI geographies or LMI individuals. Of the 77 branches in the MSA, 70 or 90.9% have early morning, late evening, or Saturday hours. Of the 29 branches in LMI census tracts, 27 or 93.1% had extended or Saturday hours.

### Community Development Services

The bank was a leader in providing community development services in the MSA throughout the evaluation period. The table to the right shows the number and type of services, with the majority being mortgage education seminars. In addition, management and staff served as directors, advisors or committee members to 41

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	483
Financial Literacy	10
Small Business Seminars	18
Technical Assistance	1
<b>Total</b>	<b>512</b>

nonprofit and community based organizations in the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area.

## MULTISTATE METROPOLITAN AREA

### ***CRA RATING FOR MSA 19060 (CUMBERLAND, MD-WV)<sup>5</sup>: SATISFACTORY***

***The Lending test is rated: Low Satisfactory***

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

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

The major factors supporting the rating include:

- Adequate responsiveness to assessment area credit needs;
- A good distribution of loans among individuals of different income levels and businesses of different sizes;
- A good geographic distribution of loans in the bank's assessment area;
- A significant level of qualified investments;
- A relatively high level of community development services;
- Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment area;
- Hours and services that are tailored to the convenience and needs of the assessment area; and
- The bank makes few if any community development loans.

### **SCOPE OF EXAMINATION**

A full-scope review was conducted of M&T's performance in multistate MSA 19060 (Cumberland, MD-WV), based on deposit concentration, lending volume, and branch office network. As shown in Exhibit I on page 10, activities in this multistate MSA made up less than 1.0% of the bank's deposits, 1.0% of branches, and 1.0% of the bank's loans.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 19060 (CUMBERLAND, MD-WV)**

As of December 31, 2013, M&T had eight branches in MSA 19060 (Cumberland, MD-WV), which represents less than 1.0% of the bank's overall branches and deposits. The MSA also contained 1.0% of the bank's HMDA and small business loans. Despite a low proportion of the bank's overall deposits, M&T is the number two bank in the area in terms of deposit market

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<sup>5</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

share, with 23.0% of deposits as reported by the FDIC as of June 30, 2013. Area competitors in the market include Susquehanna Bank, First United Bank & Trust, PNC, and Branch Banking & Trust.

**PERFORMANCE CONTEXT**

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

Demographic Characteristics

Located in the western corner of Maryland and crossing the border into West Virginia, the MSA 19060 (Cumberland, MD-WV) assessment area consists of Allegany County, Maryland and Mineral County, West Virginia. The core of the MSA 19060 (Cumberland, MD-WV) assessment area is Allegany County, which contains approximately 73.0% of the MSA population. The overall population of the MSA indicates a downward trend as the population has declined by 4.0% since 1970 to its current level of 103,299 as of December 31, 2010. Families residing within the assessment area below the poverty level (10.0%) are significantly higher than the State of Maryland (6.0%) and lower than the State of West Virginia (13.0%).

Income Characteristics

The 2012 and 2013 FFIEC-adjusted MFI for MSA 19060 (Cumberland, MD-WV) are listed in the accompanying table to the right. The MSA 19060 (Cumberland, MD-WV) assessment area contains five moderate-income tracts. Three tracts are located in Mineral County and the other two are in Allegany County.

<b>FFIEC MEDIAN FAMILY INCOMES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 19060	\$53,000	\$53,300

Housing Characteristics

According to the 2010 Census, 62.8% of MSA housing is owner-occupied. According to the table to the right, information from NAR demonstrates that the median sales price of homes within the MSA 19060 (Cumberland, MD-WV) improved since the previous evaluation. Data also reflects improving economic conditions and the City of Cumberland’s position as a regional healthcare center. While home prices have increased in light of income levels in the area, homeownership remains difficult for moderate-income families and even more challenging for low-income families. The year 2013 MFI for the assessment area is \$53,300 of which 50.0% would be the maximum income figure for low-income families. Only 39.0% of the area’s housing is valued under \$60,000 and more affordable for low-income residents.

<b>MEDIAN SALES PRICE</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 19060	\$96,200	\$102,200

Mobile homes are usually considered more affordable to LMI residents. The 2010 Census data reveals 6.0% of all dwellings located within the assessment area are mobile homes.

A significant portion of the housing units within MSA 19060 (Cumberland, MD-WV) are older. The 2010 Census reports that the median age of housing stock is 52 years. This level of older housing stock indicates a possible need for home improvement financing.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 3,773 businesses in 2013, of which 89.9% were small businesses with GAR of \$1 million or less.

MSA 19060 (Cumberland, MD-WV) is primarily rural in nature. Over the past several years the economy has remained somewhat stagnant with the majority of residents commuting to the nearby cities of Winchester, Virginia, and Hagerstown, Maryland for employment opportunities. The region's manufacturing and trade sectors are considered weaker and the economy is expected to grow more slowly than the national average. Within the City of Cumberland, major employers include Western Maryland Health System, Frostburg State University, Allegany County Board of Education, and CSX Railroad. The presence of several prisons and call centers also provides employment opportunities in the area.

As shown in the table to the right, unemployment levels, although trending downward during the evaluation period, remain high. However, the jobless rate for the MSA was generally higher than those of the States of Maryland and West Virginia.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATE</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 19060	7.9%	7.4%
State of Maryland	6.9%	6.6%
State of West Virginia	7.1%	6.0%

According to the National Association of Home Builders 2012 Improving Market Index which measures employment, house prices, and single family housing permit growth, the area's economic health is improving.

Additional performance context data for this assessment area is provided in MSA 19060 (Cumberland, MD-WV) Assessment Area Demographics table on the next page.

### Assessment Area Demographics

Assessment Area: MSA 19060

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,918	19.3
Moderate-income	5	16.7	4,766	18.7	757	15.9	5,094	20.0
Middle-income	21	70.0	16,745	65.8	1,711	10.2	5,208	20.5
Upper-income	4	13.3	3,933	15.5	142	3.6	10,224	40.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>30</b>	<b>100.0</b>	<b>25,444</b>	<b>100.0</b>	<b>2,610</b>	<b>10.3</b>	<b>25,444</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	9,270	4,910	16.9	53.0	3,301	35.6	1,059	11.4
Middle-income	30,645	19,231	66.2	62.8	7,003	22.9	4,411	14.4
Upper-income	6,315	4,925	16.9	78.0	715	11.3	675	10.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>46,230</b>	<b>29,066</b>	<b>100.0</b>	<b>62.9</b>	<b>11,019</b>	<b>23.8</b>	<b>6,145</b>	<b>13.3</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	896	23.7	791	23.3	66	30.4	39	23.6
Middle-income	2,309	61.2	2,083	61.4	116	53.5	110	66.7
Upper-income	568	15.1	517	15.2	35	16.1	16	9.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>3,773</b>	<b>100.0</b>	<b>3,391</b>	<b>100.0</b>	<b>217</b>	<b>100.0</b>	<b>165</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.9</b>		<b>5.8</b>		<b>4.4</b>

Based on 2010 ACS Information

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 19060 (CUMBERLAND, MD-WV)

#### LENDING TEST

M&T's performance under the lending test in MSA 19060 (Cumberland, MD-WV) was adequate. This conclusion is based on adequate lending activity performance, and good geographic and borrower distribution performance. Community development lending is considered very poor as there was no community development lending in the multistate assessment area during the evaluation period.



Greater weight was given to the analysis of small business and refinance lending performance followed by home improvement and home purchase lending in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the evaluation of community development lending, and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in MSA 19060 (Cumberland, MD-WV) reflect adequate responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's 2013 lending levels, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was below the aggregate's lending activity.

M&T's market share of deposits in the assessment area and its market share of lending were stable, with the exception of home purchase and refinance lending, which decreased. In 2013, M&T had deposit market share of 23.0%, and lending market share of approximately 1.0% in home purchase lending, 3.0% in refinance lending, 9.0% in home improvement lending, and 8.0% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 23.0%, and lending market share was 4.0% in home purchase lending, 5.0% in refinance lending, 8.0% in home improvement lending, and 9.0% in small business lending.

HMDA and small business volumes for the evaluation period decreased by 14.0% compared to the last evaluation. This decrease was driven by decreases in home purchase (-42.0%), refinance (-15.0%), and small business (-22.0%) loan volumes, partially offset by increased home improvement (38.0%) loan volumes. Comparisons to the aggregate data for the evaluation period indicated overall decreased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was consistent with the lending volume of similarly-situated banks.

### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration in the multistate MSA 19060 (Cumberland, MD-WV) assessment area. This conclusion was based on M&T's performance in moderate-income census tracts, as there are no low-income tracts in the assessment area. Lending penetration in moderate-income census tracts was good for refinance lending, adequate for home purchase and small business lending, and excellent for home improvement lending. There were no conspicuous gaps in lending as all five of the moderate-income tracts had lending.

### *Home Purchase*

M&T's home purchase lending in moderate-income census tracts was adequate. In 2013, M&T made 12.5% (1 of 8) by number and 7.8% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase performance was below the demographics which indicated that 16.9% of owner-occupied housing units were located in moderate-income census tracts. Home purchase performance was below the aggregate which made 16.4% by number and 15.9% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase lending in 2012 was above 2013's performance as M&T made 33.3% (6 of 18) home purchase loans by number and 29.7% by dollar volume in moderate-income census tracts. Performance was above the demographic and aggregate.

### *Refinance*

M&T's refinance lending in moderate-income census tracts was good. In 2013, M&T made 12.5% by number and 8.1% by dollar volume of its refinance loans in moderate-income census tracts. Performance was below the demographic which indicated 16.9% of owner-occupied housing units were located in moderate-income census tracts. Refinance performance was also below the aggregate which made 13.4% by number and 15.5% by dollar volume of its refinance loans in moderate-income census tracts. Refinance lending in 2012 was above 2013's performance, which exceeded both the demographic and aggregate.

### *Home Improvement*

Home improvement lending in moderate-income census tracts was excellent. The bank's home improvement lending was above the demographics of the assessment area, which indicated that 16.9% of the available owner-occupied housing units were located in moderate-income census tracts compared to the bank's 46.2% by number and 12.5% by dollar volume of home improvement loans. Home improvement performance was also above the aggregate which made 21.5% by number and 15.7% by dollar volume of its home improvement loans in moderate-income census tracts. Home improvement lending in 2012 was comparable to 2013's performance exceeding both the demographic and aggregate.

### *Small Business*

Small business lending performance in moderate-income census tracts was adequate. In 2013, M&T originated 18.2% by number and 13.7% by dollar volume of its small business loans in moderate-income census tracts, which was below the aggregate's performance of 21.2% by number and 16.4% by dollar volume of small business loans in moderate-income census tracts. Small business lending was also below the demographics, which indicated that 23.7% of small businesses were located in moderate-income areas. Small business performance in 2012 was comparable to performance in 2013.

## **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in MSA 19060 (Cumberland, MD-WV) area reflects good penetration. Overall, lending to low-income borrowers and small businesses was good while lending to moderate-income borrowers was adequate.

### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was adequate based on adequate distribution to moderate-income borrowers and good distribution to low-income borrowers. M&T's home purchase lending to low-income borrowers was good. M&T made three of eight loans (37.5%) by number and 24.0% by dollar volume of its home purchase loans to low-income borrowers when 19.3% of families in the MSA assessment area were of low-income. Home purchase performance was above the performance of the aggregate which made 7.6% by number and 4.1% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2012 home purchase performance was below its 2013 performance.

Home purchase lending to moderate-income borrowers was adequate. M&T made one of eight, which equals 12.5% by number and 14.2% by dollar volume, of its home purchase loans to moderate-income borrowers when 20.0% of families in the MSA assessment area were of moderate-income. Home purchase performance was below the aggregate which made 23.7% by number and 18.5% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance was above its 2013 performance as performance exceeded the demographic but was lower than the aggregate.

### *Refinance*

Refinance lending to LMI borrowers was adequate as 12.5% by number and 6.7% by dollar volume of refinance loans were to low-income borrowers compared to 19.3% of families in the MSA assessment area which were of low-income. Performance however, was above the aggregate which made 7.3% by number and 3.0% by dollar volume of its refinance loans to low-income borrowers. M&T's 2012 refinance performance was below its 2013 performance.

Refinance lending to moderate-income borrowers was adequate. M&T made 12.5% by number and 11.6% by dollar volume of its refinance loans to moderate-income borrowers when 20.0% of families in the MSA assessment area were of moderate-income. Refinance performance was below the aggregate which made 14.1% by number and 7.4% by dollar volume of its refinance loans to moderate-income borrowers. M&T's 2012 refinance was below its 2013 performance.

### *Home Improvement*

M&T's home improvement lending to LMI borrowers was excellent. M&T made 34.6% by number and 10.2% by dollar volume of its home improvement loans to low-income borrowers when 19.3% of families in the MSA assessment area were of low-income. Home improvement performance was above the performance of the aggregate which made 13.0% by number and 3.5% by dollar volume of its home improvement loans to low-income borrowers. Home improvement performance in 2012 was comparable to 2013's performance as performance exceeded both the demographic and aggregate.

Home improvement lending to moderate-income borrowers was excellent. M&T made 26.9% by number and 7.4% by dollar volume of its home improvement loans to moderate-income borrowers when 20.0% of families in the MSA assessment area were of moderate-income. Home improvement performance was above the aggregate which made 14.4% by number and 7.3% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent.

### *Small Business Lending*

M&T provided a good level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 43.6% by number and 22.3% by dollar volume of its small business loans to these businesses, compared to the 89.9% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 32.1% by number and 23.2% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 58.2% of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 87.7% of small business loans in amounts of \$100,000 or less; however, the aggregate includes credit card lenders who typically make small dollar credit facilities. Small business lending performance in 2012 was comparable to the bank's performance in 2013 as the percentage of loans to businesses with GAR of \$1 million or less was below the demographic but exceeded the aggregate. In 2012, 72.4% of small business loans were in amounts of \$100,000 or less compared to the aggregate's 90.4%.

### **Community Development Lending:**

M&T's performance in MSA 19060 (Cumberland, MD-WV) was rated as substantial noncompliance as the bank did not make any community development loans in the MSA over the past two evaluation periods. Management indicated; however, that opportunities in the MSA for community development lending are limited.

## INVESTMENT TEST

As shown in the table to the right, M&T's performance in the multistate MSA 19060 (Cumberland, MD-WV) under the investment test was rated high satisfactory. M&T made a significant level of qualified community development investments and grants in MSA 19060

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	3	\$3,125
Economic Development	3	\$3
<b>Total</b>	<b>6</b>	<b>\$3,128</b>

(Cumberland, MD-WV), with \$3.1 million of qualified investments dedicated to activities inside the assessment area. Total qualified investments made in MSA 19060 (Cumberland, MD-WV) accounted for less than 1.0% of M&T's total qualified investments. Of the assessment area investments, 4.0% were new investments made in the current evaluation period. M&T's level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

M&T exhibited good responsiveness to the credit and community development needs of the assessment area, with investment activities only targeting affordable housing projects for LMI individuals. The bank also made extensive use of complex investments to support community development initiatives, with 96.0% of assessment area investments made in LIHTC projects. The remaining 4.0% of investments were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments.

Qualified investments also consisted of grants totaling \$3,000 to organizations that support affordable housing for LMI individuals.

## SERVICE TEST

M&T's performance under the service test in MSA 19060 (Cumberland, MD-WV) was good based on delivery systems that were readily accessible to all portions of the assessment area, changes in branch locations that did not adversely affect accessibility, and hours and services that were tailored to the convenience and needs of the assessment area. M&T also provided a relatively high level of community development services.

### Retail Services

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated eight branches in this assessment area, four (50.0%) of which were located in moderate-income areas. This compares favorably to 18.0% of the MSA's population residing in moderate-income areas. This assessment area does not contain any low-income census tracts.

Alternative delivery systems enhanced the bank's performance in this assessment area. M&T had 10 off-site ATM locations in the assessment area, of which one (10.0%) was located in a moderate-income area.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in this assessment area.

Hours and services were tailored to the convenience and needs of its assessment area, particularly LMI geographies or LMI individuals. Of the eight branches located in the MSA, seven (87.5%) had either early morning, late evening hours, or Saturday hours, with two of such branches operating in LMI areas.

### **Community Development Services**

M&T provided an adequate level of community development services in the assessment area. The bank conducted a total of 47 community development service activities, which consisted entirely of mortgage education seminars.

## STATE OF NEW YORK

### ***CRA RATING FOR NEW YORK<sup>6</sup>: OUTSTANDING***

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

***The Investment test is rated: Outstanding***

***The Service test is rated: Outstanding***

The major factors supporting the rating include:

- A leader in making community development loans;
- An excellent level of qualified community development investments;
- Makes extensive use of innovative and/or complex investments to support community development activities;
- Readily accessible delivery systems to geographies and individuals of different income levels;
- Good responsiveness to assessment area credit needs;
- Good geographic distribution of loans in the bank's assessment areas;
- Good distribution of loans among individuals of different income levels and businesses of different sizes; and
- A leader in providing community development services.

### **SCOPE OF EXAMINATION**

Examiners conducted full-scope reviews of the following four assessment areas in New York State: MSA 15380 (Buffalo-Niagara Falls, NY), MSA 40380 (Rochester, NY), MSA 45060 (Syracuse, NY), and MSA 13780 (Binghamton, NY). M&T's combined full-scope areas make up 85.3% of the deposits and 71.6% of the loans originated in the New York assessment areas during the review period. In order to derive the state rating, full-scope assessment areas were weighted based on the proportion of loan originations, deposits, and branches in each area. Limited-scope reviews were conducted of the remaining New York assessment areas:

- MSA 10580 (Albany, NY)
- MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)
- MSA 46540 (Utica-Rome, NY)

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<sup>6</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

- MSA 28740 (Kingston, NY)
- MSA 27060 (Ithaca, NY)
- MSA 21300 (Elmira, NY)
- NY Nonmetropolitan area Group A (Allegany, Cattaraugus, Chautauqua, Genesee, Wyoming, and Steuben Counties)
- NY Nonmetropolitan area Group B (Cayuga, Chenango, Seneca, and Cortland Counties)
- NY Nonmetropolitan area Group C (Sullivan County)
- NY Nonmetropolitan area Group D (Jefferson County)

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW YORK**

M&T's performance in the New York State assessment areas received the most weight in deriving the bank's overall CRA performance rating. As detailed in Exhibit I on page 10, 31.0% of branches and 41.0% of branch deposits were located in the New York State assessment areas. Furthermore, 51.0% of home purchase loans, 32.0% of refinance loans, 41.0% of home improvement loans, and 41.0% of small business loans were originated in the New York State assessment areas during the evaluation period. See Exhibit IV, Summary of Key Assessment Area Data on page 77, for additional assessment area data for New York State.

M&T had a 3.0% deposit market share and ranks 7<sup>th</sup> in New York State. Other banks operating in this New York State assessment area with significant deposit market share as of June 30, 2013, are JP Morgan Chase, HSBC Bank USA, RBS Citizens Bank NA, Keybank, NA, First Niagara Bank, and Bank of America, NA. M&T has 213 banking center locations within New York.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK**

### **LENDING TEST**

M&T's lending test performance within the assessment areas located in New York is rated high satisfactory. M&T's lending reflects good responsiveness to the credit needs of its four full scope assessment areas. Lending performance was good in MSA 15380 (Buffalo-Niagara Fall, NY), MSA 40380 (Rochester, NY), MSA 45060 (Syracuse, NY), and MSA 13780 (Binghamton, NY). Some data used to evaluate the bank's performance in the state assessment areas appear in Appendices E, G, and H.

### **Lending Activity**

M&T's lending activity showed good responsiveness to retail credit needs in the bank's assessment areas when measured in terms of the number and dollar amount of HMDA-related and small business loans originated and purchased in each assessment area. This conclusion is based on good lending activity in the state's full scope assessment areas.



## **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration throughout New York State. This conclusion is based on excellent performance in MSA 13780 (Binghamton, NY) and good performance in MSA 15380 (Buffalo, NY), MSA 40380 (Rochester, NY), and MSA 45060 (Syracuse, NY). There were no significant lending gaps in the assessment areas. For details, refer to the Geographic Distribution section of each full-scope assessment area.

## **Borrower Distribution**

The overall distribution of loans among borrowers of different income levels and businesses of different sizes in New York State was good. This conclusion is based on good performance in MSA 15380 (Buffalo-Niagara Falls, NY), MSA 40380 (Rochester, NY), MSA 45060 (Syracuse, NY), and MSA 13780 (Binghamton, NY).

## **Community Development Lending**

M&T was a leader in community development lending performance in the New York State assessment areas. In New York, M&T originated 194 community development loans totaling \$1.2 billion, which represented 33.3% of M&T's total community development loans by dollar volume. This is an excellent level of community development lending in New York. Finally, M&T was considered responsive to the credit and community development needs in the state; therefore, positive consideration was given to community development lending without a purpose, mandate, or function of serving any of M&T's delineated assessment areas in New York State. During this evaluation period, M&T made eight qualified community development loans totaling \$33.8 million. These loans supported affordable housing, economic development, and revitalization projects that benefited counties within the state, but outside of M&T's delineated assessment area.

Community development lending performance was excellent in MSA 15380 (Buffalo-Niagara Falls, NY) and MSA 45060 (Syracuse, NY), good in MSA 40380 (Rochester, NY), and adequate in MSA 13780 (Binghamton, NY).

Community development lending was spread across New York State. By dollar volume, MSA 15380 (Buffalo-Niagara Falls, NY) had 41.8% of the New York State total, 10.3% in MSA 40380 (Rochester, NY), and 18.2% in MSA 45060 (Syracuse, NY), with the balance spread across the remaining New York State.

Lending primarily targeted revitalization and stabilization endeavors with 64.7% of statewide activity dedicated, and affordable housing with 13.7% of statewide activity dedicated. Community development loans supporting community services activities represented 11.5% of lending activity, and 10.1% went to economic development.

## **INVESTMENT TEST**

M&T's performance under the investment test within the assessment areas located in New York is rated outstanding. In the state, M&T had an overall excellent level of qualified community development investments that exhibited excellent responsiveness to credit and community development needs. This conclusion was based on excellent performance in MSA 15380 (Buffalo-Niagara Falls, NY), good performance in MSA 40380 (Rochester, NY) and MSA 45060 (Syracuse, NY), and adequate performance in MSA 13780 (Binghamton, NY).

M&T made 817 qualified investments totaling \$239.5 million in the State of New York, which represents 41.7% of the bank's total qualified investments. In addition, M&T had \$133.7 million from prior periods. Investment activity was primarily in MSA 15380 (Buffalo-Niagara Falls, NY) with \$47.7 million of investments, MSA 40380 (Rochester, NY) with \$47.2 million, and MSA 45060 (Syracuse, NY) with \$38.9 million. M&T was considered responsive to the credit and community development needs in the state, therefore, investments without a purpose, mandate, or function of serving M&T's assessment areas in New York were considered to positively impact state performance. M&T made \$11.7 million in qualified investments made to the broader statewide area.

M&T made extensive use of innovative or complex investments to support community development initiatives in the State of New York. Approximately \$100 million or 42.0% of the qualified investments were invested in LIHTCs, which have intricate accounting requirements, and \$7 million in solar tax credit, which support innovative energy efficiency projects.

## **SERVICE TEST**

M&T's performance under the service test in the New York State assessment areas located in New York is rated outstanding. This conclusion is based on excellent performance in MSA 15380 (Buffalo-Niagara Falls, NY) and MSA 13780 (Binghamton, NY) and good performance in MSA 40380 (Rochester, NY) and MSA 45060 (Syracuse, NY).

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's Service Test section in this report.

## **Retail Services**

Retail delivery systems are readily accessible to all geographies, including LMI geographies, individuals of different income levels, and businesses of different revenue sizes in the institution's assessment areas. Retail service distribution was excellent in MSA 15380 (Buffalo-Niagara Falls, NY) and MSA 13780 (Binghamton, NY), good in MSA 45060 (Syracuse, NY), and adequate in MSA 40380 (Rochester, NY).

M&T has 213 banking centers in New York, which represents 31.0% of M&T's total branches. M&T's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI families. Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, including LMI geographies in the full scope assessments areas in the New York State.

### **Community Development Services**

M&T was a leader in providing community development services in New York. M&T has excellent performance in MSA 15380 (Buffalo-Niagara Falls, NY), MSA 40380 (Rochester, NY), and MSA 13780 (Binghamton, NY), and good performance in MSA 45060 (Syracuse, NY).

EXHIBIT IV: Summary of Key Assessment Area Data: New York State Assessment Areas

	MSA 15380	MSA 40380	MSA 45060	MSA 13780	MSA 10580	MSA 39100	MSA 46540	Non-MSA Group A	MSA 28740	MSA 27060	Non-MSA Group B	Non-MSA Group C	MSA 21300	Non-MSA Group D	New York Totals
Total Population <sup>4</sup>	1,135,509	1,054,323	540,468	251,725	837,967	670,301	299,397	465,392	182,493	101,564	215,090	77,547	88,830	116,229	6,036,835
Population % of AA population	19%	17%	9%	4%	14%	11%	5%	8%	3%	2%	4%	1%	1%	2%	100%
Families	287,669	263,731	132,238	64,130	205,234	164,000	76,949	121,998	45,201	19,798	54,861	19,797	22,962	30,650	1,509,218
Families % of AA families	19%	17%	9%	4%	14%	11%	5%	8%	3%	1%	4%	1%	2%	2%	100%
Total Census Tracts <sup>4</sup>	299	267	156	65	210	158	93	126	47	23	54	24	22	26	1,570
Tracts % AA tracts	19%	17%	10%	4%	13%	10%	6%	8%	1%	1%	3%	2%	1%	2%	100%
LMI tracts	97	88	53	18	57	36	23	18	7	5	2	4	8	6	422
LMI tracts % all AA LMI tracts	23%	21%	13%	4%	14%	9%	5%	4%	2%	1%	0%	1%	2%	1%	100%
Total Owner-Occupied Units <sup>4</sup>	312,759	284,969	141,488	70,146	219,096	164,111	81,329	135,654	49,203	21,157	60,463	20,073	24,121	25,234	1,609,803
Units % of AA units	19%	18%	9%	4%	14%	10%	5%	8%	3%	1%	4%	1%	1%	2%	100%
Business Establishments <sup>5</sup>	49,307	45,379	25,320	10,820	38,568	31,878	11,481	18,722	9,736	4,382	8,176	3,311	3,450	4,295	264,825
Bus. est. % AA bus. est.	19%	17%	10%	4%	15%	12%	4%	7%	4%	2%	3%	1%	1%	2%	100%
Number of Branches <sup>1</sup>	51	32	29	14	14	19	12	23	6	3	5	3	1	1	213
Branches % all branches	24%	15%	14%	7%	7%	9%	6%	11%	3%	1%	2%	1%	0%	0%	100%
Branches in LMI tracts	15	5	6	4	3	4	0	2	2	1	0	1	1	0	44
LMI branches % AA LMI branches	34%	11%	14%	9%	7%	9%	0%	5%	5%	2%	0%	2%	2%	0%	100%
Branch Deposits (\$'000,000s) <sup>2</sup>	15,581	3,685	2,575	1,364	1,034	972	624	637	331	170	122	68	21	23	27,207
Deposits % AA deposits	57%	14%	9%	5%	4%	4%	2%	2%	1%	1%	0%	0%	0%	0%	100%
Deposit Market Share (%) / Rank	47/1	25/1	27/1	51/1	5/6	9/4	17/2	12/3	10/3	9/3	4/9	5/7	2/5	2/9	3/7
Home Purchase Originations <sup>3</sup>	3,716	1,847	754	351	913	439	393	442	81	35	178	81	32	46	9,308
HP originations % AA orig.	40%	20%	8%	4%	10%	5%	4%	5%	1%	0%	2%	1%	0%	0%	100%
Refinance Originations <sup>3</sup>	2,255	880	661	372	449	205	254	267	89	34	157	27	16	26	5,692
Refi orig. % AA orig.	40%	15%	12%	7%	8%	4%	4%	5%	2%	1%	3%	0%	0%	0%	100%
Home Improvement Originations <sup>3</sup>	575	283	238	116	67	54	139	167	22	14	62	5	4	6	1,752
Home Improvement orig. % AA ori	33%	16%	14%	7%	4%	3%	8%	10%	1%	1%	4%	0%	0%	0%	100%
Small Business Originations <sup>3</sup>	1,717	1,381	833	458	393	421	281	310	129	55	137	17	35	27	6,194
SB orig. % AA orig.	28%	22%	13%	7%	6%	7%	5%	5%	2%	1%	2%	0%	1%	0%	100%
Combined Loan Totals	8,263	4,391	2,486	1,297	1,822	1,119	1,067	1,186	321	138	534	130	87	105	22,946
% of AA Orig.	36%	19%	11%	6%	8%	5%	5%	5%	1%	1%	2%	1%	0%	0%	100%

(1) Branch numbers are as of 12/31/2013. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/13. (3) Originations are loans reported under HMDA or CRA small business reporting for 2012 and 2013. (4) Demographic information was obtained from the 2010 Census. (5) Business establishments information was reported by Dun & Bradstreet for 2013.

## **METROPOLITAN AREA**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 15380 (BUFFALO-NIAGARA FALLS, NY)**

MSA 15380 (Buffalo-Niagara Falls, NY) contains the largest proportion of M&T's branches, loans and deposits in New York, and includes the City of Buffalo, where the bank has its headquarters. As of December 31, 2013, M&T operated 51 branches in the MSA, representing 24.0% of the bank's branches in New York. Based on the FDIC Deposit Market Share Report, M&T held \$15.6 billion or 57.0% of its total deposit base in MSA 15380 (Buffalo-Niagara Falls, NY), as of June 30, 2013. Of the bank's total HMDA-related and small business originations in the State of New York, 36.0% of total HMDA-related and small business originations were made in this MSA.

MSA 15380 (Buffalo-Niagara Falls, NY) is a highly competitive market and home to some of the largest banking institutions in the United States. M&T captured a deposit market share of 47.0%, ranking 1<sup>st</sup> in deposits among the 17 depository institutions operating in this assessment area. Other lead banks in terms of deposit market share were Key Bank National Association, First Niagara Bank, Bank of America NA and RBS Citizens Bank, NA. Deposits in this assessment area accounted for 23.6% of M&T's total deposits and 57.0% of M&T's deposits in New York State. This was the highest percentage of deposits within the state and the highest percentage within M&T's CRA footprint.

### **Community Contacts**

In order to learn more about community credit needs, examiners conducted interviews and received comments with two nonprofit agencies, one contact that focused on affordable housing and the other contact on community development.

One community contact was conducted with a nonprofit organization that acts as an advocate for quality affordable housing, administers rental housing assistance programs such as the HUD Section 8 voucher program and offers housing related programs such as home ownership counseling and home improvement programs and operates and manages over 19 rental properties in the City of Buffalo. The interviewees identified financial education for LMI borrowers as a big need in the area. They noted that banks should help to provide more homebuyer education opportunities. Foreclosure prevention and affordable multifamily housing are important needs in the area.

A second contact was conducted with a nonprofit organization dedicated to community development. The organization forms partnerships with corporations, government agencies, and other contributors to provide funding to community development corporations. The contact

stressed the need for financial institutions to assist the City of Buffalo in its demolition and rehabilitation of homes within disadvantaged communities. The contact also indicated that the city's economy is now stable but does not generate lots of employment. Challenges to banks include making investment decisions when they are faced with increased real estate vacancy rates.

## PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T Bank operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, HUD, FFIEC, and NAR.

### Demographic Characteristics

M&T's assessment area in MSA 15380 (Buffalo-Niagara Falls, NY) includes Erie and Niagara Counties. According to the 2010 Census, the population of the assessment area was approximately 1.1 million, with 81.0% residing in Erie County, which includes the City of Buffalo. Niagara County, which includes the City of Niagara Falls, is less densely populated. The 2010 Census ranks the City of Buffalo as the 69<sup>th</sup> largest city in the United States with a population of 261,348 and the second most populous city in the state after New York City.

### Income Characteristics

According to 2010 Census data, 21.6% of families in the MSA are considered low-income, 17.4% are moderate-income, and 10.0% have incomes below the poverty level. According to FFIEC data, the estimated MFI for the assessment area was \$63,500 in 2013, representing a slight decrease when compared to \$66,100 in 2012.

### Housing Characteristics

The 2010 Census reports that the MSA has approximately 519,118 housing units, of which 312,759 units or 60.2% are owner-occupied, 29.6% are rental, and 10.2% are vacant. Approximately, 19.3% of all owner-occupied units in the MSA are located in LMI census tracts. The median age of housing in the assessment area is 57 years, indicating a need for home improvement lending.

During the evaluation period, housing prices increased slightly. According to NAR, the median sales price for existing single-family homes in MSA 15380 (Buffalo-Niagara Falls, NY) was \$131,000 in 2013 and \$126,900 in 2012. The area's housing market held up much better than the nation's during the recession. While national home prices underwent steep declines, home prices in MSA 15380 (Buffalo-Niagara Falls, NY) appreciated, though at a slow pace.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 49,307 businesses in 2013, of which 87.9% were small businesses with GAR of \$1 million or less.

The loss of traditional jobs in manufacturing, rapid suburbanization, and high costs of labor have led to economic decline. MSA 15380 (Buffalo-Niagara Falls, NY)'s key industries were primarily durable goods manufacturing, in particular steel. Although there has been a sharp decline, manufacturing still accounts for a slightly above average share of employment in the area today. As manufacturing's share of the local economy has declined, health and education, as well as other service industries, have accounted for a greater share of the economy. The educational profile of the population reports that 27.0% of adults hold a college degree, which is somewhat below the statewide average of 32.0% but close to the nationwide average of 28.0%.

During the most recent economic recession, MSA 15380 (Buffalo-Niagara Falls, NY) sustained job losses of 3.8% comparable to New York State but considerably lower than the national decline of over 6.0%. Unemployment rates for the assessment area continued to trend downward, consistent with the nationwide average. Unemployment rates for this area ranged from 9.4% in February 2012 to 6.7% in December 2013. Comparatively, nationwide unemployment rates ranged from 8.3% in 2012 to 6.7% in 2013.

Additional performance context data for this assessment area is provided in the MSA 15380 (Buffalo-Niagara Falls, NY) Assessment Area Demographics table on the next page.

Assessment Area Demographics								
Assessment Area: MSA 15380								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	37	12.4	25,463	8.9	10,024	39.4	62,186	21.6
Moderate-income	60	20.1	45,877	15.9	8,635	18.8	50,197	17.4
Middle-income	123	41.1	115,191	40.0	7,428	6.4	59,979	20.9
Upper-income	71	23.7	101,138	35.2	2,635	2.6	115,307	40.1
Unknown-income	8	2.7	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>299</b>	<b>100.0</b>	<b>287,669</b>	<b>100.0</b>	<b>28,722</b>	<b>10.0</b>	<b>287,669</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	62,299	15,718	5.0	25.2	30,840	49.5	15,741	25.3
Moderate-income	100,743	44,567	14.2	44.2	40,974	40.7	15,202	15.1
Middle-income	201,882	134,666	43.1	66.7	53,650	26.6	13,566	6.7
Upper-income	154,194	117,808	37.7	76.4	28,009	18.2	8,377	5.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>519,118</b>	<b>312,759</b>	<b>100.0</b>	<b>60.2</b>	<b>153,473</b>	<b>29.6</b>	<b>52,886</b>	<b>10.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,901	7.9	3,283	7.6	462	11.1	156	8.6
Moderate-income	7,190	14.6	6,156	14.2	734	17.7	300	16.5
Middle-income	20,083	40.7	17,527	40.4	1,796	43.2	760	41.9
Upper-income	18,006	36.5	16,271	37.5	1,152	27.7	583	32.1
Unknown-income	127	0.3	97	0.2	14	0.3	16	0.9
<b>Total Assessment Area</b>	<b>49,307</b>	<b>100.0</b>	<b>43,334</b>	<b>100.0</b>	<b>4,158</b>	<b>100.0</b>	<b>1,815</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>87.9</b>		<b>8.4</b>		<b>3.7</b>

Based on 2010 ACS Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 15380 (BUFFALO-NIAGARA FALLS, NY)

### LENDING TEST

M&T's performance under the lending test in MSA 15380 (Buffalo-Niagara Falls, NY) was good. This conclusion is based on good lending activity performance, good geographic and borrower distribution performance, and being a leader in making community development loans.



Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in MSA 15380 (Buffalo-Niagara Falls, NY) reflect good responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volume in comparison to the last evaluation market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending volume was above the aggregate's lending in this MSA.

M&T's market share of deposits in the assessment area increased, while its market share of lending was stable, with the exception of home purchase lending, which increased. In 2013, M&T had a deposit market share of 47.0%, and lending market share of 14.0% in home purchase lending, 9.0% in refinance lending, 14.0% in home improvement lending, and 6.0% in small business lending.

HMDA and small business volumes for the evaluation period increased by 36.0% compared to the last evaluation. This increase was driven primarily by increases in home purchase lending (79.0%), refinance (24.0%), home improvement (24.0%), and small business (2.0%) loan volumes. Comparisons to the aggregate data for the evaluation period indicated overall increased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T's performance was below the lending volume of similarly-situated banks as M&T had substantially more deposits in the MSA compared to the deposits of its peer competitors.

### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration in the MSA 15380 (Buffalo-Niagara Falls, NY) assessment area. Lending penetration in LMI census tracts was good for home purchase and small business lending, adequate for refinance lending, and excellent for home improvement

M&T demonstrated an overall low level of lending gaps. Lending gaps are considered minimal because between 2012 and 2013, there was at least 86.0% penetration rate in all census tracts. The penetration is good despite the low owner-occupancy rate and high percentage of rentals and vacancies in low-income tracts. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	37	4	89%
Moderate	60	6	90%
Middle	123	0	100%
Upper	71	0	100%
<b>2012</b>			
Low	37	5	86%
Moderate	60	3	95%
Middle	123	0	100%
Upper	71	0	100%

### *Home Purchase*

The overall geographic distribution of home purchase loans in LMI census tracts was good. Home purchase lending in low-income census tracts was good because M&T's performance compared favorably to the 2012 and 2013 aggregate of all lenders. In 2013, M&T made 3.9% of its home purchase loans by number and 1.8% by dollar volume in low-income tracts, slightly less than the percentage of owner-occupied housing units at 5.0% but compared favorably to the aggregate at 2.5% by number and 1.2% by dollar volume in low-income geographies. Home purchase lending in 2012 was comparable to 2013.

M&T's overall performance in moderate-income census tracts was also good. In 2013, M&T made 13.3% by number and 8.3% by dollar volume of its home purchase loans in moderate-income census tracts, slightly less than the percentage of owner-occupied housing units at 14.2% but compared favorably to the aggregate at 11.8% by number and 7.3% by dollar volume. Home purchase lending in 2012 was comparable to 2013.

### *Refinance*

The overall geographic distribution of refinance loans in LMI income census tracts was adequate. The distribution of refinance loans was adequate in low-income census tracts based on comparable performance to aggregate lending in low-income census tracts. In 2013, M&T made 2.2% by number and 1.6% by dollar volume of its refinance loans in low-income census tracts which was below the percentage of owner-occupied housing units at 5.0% but comparable to the aggregate which made 1.6% by number and 5.5% by dollar volume of its refinance loans in low-income census tracts. The dollar volume of lending was lower than the aggregate due to lower loan amount requests. Refinance lending in 2012 was comparable to 2013.

Refinance lending in moderate-income census tracts was adequate. In 2013, M&T made 8.3% by number and 5.4% by dollar volume of its refinance loans in moderate-income census tracts which was below the percentage of owner-occupied housing units at 14.2% but comparable to

the aggregate which made 7.5% by number and 3.7% by dollar volume of its refinance loans in moderate-income geographies. Refinance lending in 2012 was comparable to 2013.

### *Home Improvement*

The overall geographic distribution of home improvement loans in LMI census tracts was excellent based on excellent performance in low-income geographies and good performance in moderate-income geographies. The distribution of home improvement loans in low-income census tracts was excellent because M&T's performance exceeded the 2012 and 2013 aggregate of all lenders in low-income tracts. In 2013, M&T made 10.8% by number and 4.1% by dollar volume of its home improvement loans in low-income census tracts which compared favorably to the percentage of owner-occupied housing units at 5.0% and the aggregate at 5.4% by number and 1.9% by dollar volume. Home improvement lending in 2012 was comparable to 2013. Given the median age of housing in low-income census tracts of 61 years, which would likely indicate the need for home improvement loans, M&T's distribution of home improvement loans is excellent.

Home improvement lending in moderate-income census tracts was good based on comparable aggregate lending activity. The bank made 13.3% by number and 12.2% by dollar volume of home improvement loans in moderate-income census tracts which was slightly below the percentage of owner-occupied housing units at 14.2% and the aggregate at 14.6% by number. However, M&T's dollar volume of home improvement loans exceeded aggregate lending of 6.8% in moderate-income census tracts. The number of home improvement loans in 2012 exceeded performance in 2013, but M&T's loan amounts were higher in 2013.

### *Small Business*

The overall distribution of small business loans in LMI census tracts was good. M&T's small business lending in low-income census tracts was good based on comparable performance to the 2012 and 2013 aggregate of all lenders. In 2013, M&T originated 7.1% by number and 6.7% by dollar volume of its small business loans in low-income census tracts which was slightly above the aggregate's performance of 6.4% by number and 6.0% by dollar volume but was below the demographics, with 7.9% of businesses operating in low-income census tracts. Small business lending in 2012 exceeded both aggregate lending and demographics.

M&T's small business lending in moderate-income census tracts was good based on aggregate lending activity. M&T originated 14.9% by number and 15.0% by dollar volume of its small business loans in moderate-income census tracts, which was comparable to the aggregate's 13.2% by number and 16.5% by dollar volume of small business loans in moderate-income census tracts. Small business lending was also comparable to the demographics, with 14.6% of businesses operating in moderate-income census tracts. Small business lending in 2012 was comparable to performance in 2013.

## **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 15380 (Buffalo-Niagara Falls, NY) assessment area reflects good penetration. Overall, HMDA lending to low-income and moderate-income borrowers was good. Small business lending to businesses of different sizes was good.

### *Home Purchase*

Home purchase distribution to LMI borrowers was good based on adequate distribution to low-income borrowers and excellent distribution to moderate-income borrowers. M&T's home purchase lending to low-income borrowers was adequate based on favorable performance compared to aggregate lending activity but less than favorable performance compared to the area demographics. M&T made 10.0% by number and 4.4% by dollar volume of its home purchase loans to low-income borrowers when 21.6% of families in the MSA are of low-income. Of the total number of low-income families residing in low-income census tracts, 39.4% are below the poverty level and would not qualify for home purchase loans. M&T's home purchase performance was above the performance of the aggregate which made 7.6% by number and 3.8% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2012 home purchase performance was slightly higher than 2013.

Home purchase lending to moderate-income borrowers was excellent. M&T made 27.0% by number and 17.0% by dollar volume of its home purchase loans to moderate-income borrowers when 17.4% of families in MSA are of moderate-income. Home purchase performance was above the aggregate which made 22.9% by number and 16.0% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance was comparable to 2013.

### *Refinance*

Refinance distribution to LMI borrowers was good based on adequate distribution to low-income borrowers and good distribution to moderate-income borrowers. Refinance lending to low-income borrowers was adequate as 3.8% by number and 1.9% by dollar volume of refinance loans were made to low-income borrowers compared to 21.6% of families in the MSA with low-income. M&T's performance was also below the aggregate which made 4.9% by number and 2.0% by dollar volume of its refinance loans to low-income borrowers. However, of the total housing units in the low-income census tracts, 74.8% consists of rental and vacant units which limits opportunities for refinance transactions. M&T's 2012 refinance performance was comparable to 2013.

Refinance lending to moderate-income borrowers was good. M&T made 15.2% by number and 10.0% by dollar volume of its refinance loans to moderate-income borrowers when 17.4% of

families in the assessment area have moderate-income. M&T's refinance performance was comparable to the aggregate which made 15.7% by number and 8.8% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 refinance performance exceeded performance in 2013.

### *Home Improvement*

Home improvement lending to LMI borrowers was excellent based on excellent performance to low-income borrowers and good performance to moderate-income borrowers. M&T's home improvement lending to low-income borrowers was excellent compared to number of loans made by the aggregate of all lenders. M&T made 20.1% by number and 6.6% by dollar volume of its home improvement loans to low-income borrowers when 21.6% of families in the assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 11.6% by number and 4.0% by dollar volume of its home improvement loans to low-income borrowers. M&T's 2012 home improvement performance was comparable to its 2013 performance.

Home improvement lending to moderate-income borrowers was good when compared to the demographics in moderate-income geographies. M&T made 21.9% by number and 8.3% by dollar volume of its home improvement loans to moderate-income borrowers when 17.4% of families in the assessment area are of moderate-income. Home improvement performance was below the aggregate which made 24.6% by number and 12.4% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012 home improvement performance exceeded 2013.

### *Small Business*

M&T provided a good level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 51.5% by number and 31.0% by dollar volume of its small business loans to these businesses, compared to the 87.9% of business establishments located in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 40.6% by number and 32.4% by dollar volume of its small business loans to businesses with GAR of \$1 million or less.

The bank made 55.9% by number and 14.9% by dollar volume of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 91.9% by number and 30.0% by dollar volume of small business loans in amounts of \$100,000 or less. Making small dollar loans indicates a willingness to lend in smaller amounts typically requested by small businesses. A community contact indicated there is a need for small dollar loans. Small business lending performance in 2012 was comparable to the bank's performance in 2013 as the percentage of loans to businesses with GAR of \$1 million or less was below the demographic but exceeded the

aggregate. In 2012, 55.9% of small business loans were in amounts of \$100,000 or less compared to the aggregate's 95.5%.

### Community Development Lending

The data in the table to the right supports the fact that M&T was a leader in making community development loans in MSA 15380 (Buffalo-Niagara Falls, NY) with 53 loans totaling \$487.7 million, or 41.8% of New York State community development lending activity. This is M&T's highest level of community development lending. This

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$(‘000s)</b>
Affordable Housing	6	\$8,980
Community Services	18	\$28,896
Economic Development	6	\$20,385
Revitalize and Stabilize	23	\$429,452
<b>Total</b>	<b>53</b>	<b>\$487,713</b>

conclusion was supported by a favorable comparison to similarly-situated large retail banks in the assessment area.

Community development lending was responsive to identified community needs as it targeted revitalization and stabilization endeavors, which included the revitalization of distressed neighborhoods through the construction of housing and commercial property which brought jobs for low- and moderate income individuals. Community development activities also supported economic development and community service initiatives to low- and moderate income individuals. M&T's performance is strong considering the high competition for community development loans and the number of large national banks in the area.

Examples of community development initiatives included, but are not limited to:

- A \$25 million loan that supports the construction of a new clinical science center for the Roswell Park Cancer Institute, which is the only cancer center in western New York. The property is located in a low-income area. Construction of the facility will assist in revitalizing the community through job creation.
- A \$2.0 million working capital loan to renovate a Federally Qualified Health Care Facility which serves a majority LMI population. Funding for the facility is through Medicaid and federal grants.
- A \$9.0 million construction loan to convert a 20 story office building into a 124 room Hilton Garden Inn, as well as 24 apartments. The property is located in an economic development zone and is adjacent to LMI communities. The hotel will assist in revitalizing the LMI communities and bring jobs for LMI individuals.

## INVESTMENT TEST

M&T's performance in MSA 15380 (Buffalo-Niagara Falls, NY) under the investment test was often in a leadership position. As shown in the table on the right, M&T made an excellent level of qualified community development investments and grants in MSA 15380 (Buffalo-Niagara Falls, NY), with \$47.7 million of

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	22	\$22,484
Community Services	207	\$4,213
Revitalize & Stabilize	20	\$20,983
<b>Total</b>	<b>249</b>	<b>\$47,679</b>

qualified investments dedicated to activities in MSA 15380 (Buffalo-Niagara Falls, NY). Total qualified investments made in MSA 15380 (Buffalo-Niagara Falls, NY) accounted for 30.5% of the number and 20.0% of M&T's total New York State qualified investments compared to 57.0% of deposits. On an annualized basis, qualified investments in this assessment area increased by more than three times the amount reported last evaluation, when M&T made \$16 million in investments. In addition, \$39.3 million or 83.0% of the assessment area investments were new investments made in the current evaluation period. M&T's level of qualified investments compared less favorably to that of similarly-situated large retail banks operating in the assessment area as a percentage of deposits in the MSA; however, M&T has substantially more deposits in the MSA than its peers because of its large branch network. M&T ranks 1<sup>st</sup> in deposit market share in the assessment area and numerous national and regional banks compete for the limited number of investment opportunities in the area.

M&T made extensive use of innovative or complex investments to support community development initiatives through investments in LIHTCs and direct grant assistance to a community program, totaling 53.0% of total assessment area investments.

M&T exhibited excellent responsiveness to the credit and community development needs in the assessment area. Investment activities primarily targeted affordable housing projects for LMI individuals and revitalization and stabilization of LMI areas. Of the total qualified investments made in this assessment area, \$6 million consisted of charitable donations made to community development organizations. The following are examples of qualified investments that met critical needs in the assessment area:

- A \$18 million investment in a historic tax credit project that will revitalize and stabilize a low-income community through the rehabilitation and repurposing of three buildings, which will be used as space to house a hotel, event and conference center, restaurant and food service marketplace and architectural center. This project is expected to create jobs as well as provide services to LMI-individuals in the community.
- An \$18 million investment in a LIHTC and historic tax credit project that will revitalize and stabilize a low-income community through rehabilitation and repurposing of an old school to create 68 units of affordable housing, primarily targeted for persons with severe and persistent mental illness.

- Two deposits totaling \$200,000 in a Community Development Credit Union.
- Two grants totaling \$1.5 million to a community charter school that serves primarily LMI students and provides after school enrichment programs, technology and equipment, and educational activities.

## **SERVICE TEST**

M&T's performance under the service test in MSA 15380 (Buffalo-Niagara Falls, NY) was excellent based on being a leader in providing community development services. Delivery systems in MSA 15380 (Buffalo-Niagara Falls, NY) were readily accessible to all portions of the assessment area and changes in branch locations did not adversely affect accessibility, and hours and services are tailored to the convenience and needs of the assessment area.

### **Retail Services**

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in the assessment area. M&T operated 51 branches in MSA 15380 (Buffalo-Niagara Falls, NY), of which 5 (10.0%) were located in low-income areas and 10 (20.0%) were in moderate-income areas. This compares favorably to the 9.6% and 17.0% of the MSA 15380 (Buffalo-Niagara Falls, NY) population that resides in LMI areas, respectively.

Alternative delivery systems slightly enhanced the bank's performance in the assessment area. M&T had 77 off-site ATM locations in the MSA; 5 (6.0%) of which were located in low-income tracts, and 3 (4.0%) were in moderate-income tracts.

Changes in branch locations did not adversely impact the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in MSA 15380 (Buffalo-Niagara Falls, NY).

The bank's hours and services do not vary in a way that inconveniences the needs of the assessment area, particularly LMI geographies or LMI individuals. Of the 51 branches in the MSA, 36 or 71.0% had early morning, late evening hours or Saturday hours. Of the 15 branches in LMI census tracts, seven or 47.0% had extended or Saturday hours.



### Community Development Services

The bank was a leader in providing community development services in MSA 15380 (Buffalo-Niagara Falls, NY). The table to the right shows the number and type of services provided during the evaluation period. In addition, management and staff served as directors, advisors, or committee members, providing financial management expertise and technical assistance to 102 nonprofit and community based organizations in the assessment area.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	865
Financial Literacy	12
Small Business Seminars	1
Technical Assistance	22
<b>Total</b>	<b>900</b>

## **METROPOLITAN AREA**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 40380 (ROCHESTER, NY)**

MSA 40380 (Rochester, NY) contains the second largest proportion of M&T's branches, loans and deposits in New York State and includes the City of Rochester. As of December 31, 2013, M&T operated 32 branches in the MSA, representing 15.0% of the bank's branches in New York. Based on the FDIC Deposit Market Share Report, M&T held \$3.7 billion or 14.0% of its total deposit base in MSA 40380 (Rochester, NY), as of June 30, 2013. Of the bank's total HMDA-related and small business originations made in the New York State assessment areas, M&T attained 19.0% of the lending in this MSA.

MSA 40380 (Rochester, NY) is dominated by a few regional banks competing with M&T for retail lending and deposit activity. M&T captured a deposit market share of 25.0%, ranking 1<sup>st</sup> in deposits among the 21 depository institutions operating in this assessment area. Other financial institutions with a significant deposit market share included JP Morgan Chase Bank NA, Canandaigua National Bank and Trust Company, RBS Citizens NA, and First Niagara Bank, NA.

#### **Community Contacts**

In order to learn more about community credit needs, examiners conducted interviews and received comments with one nonprofit agency that is actively involved with affordable housing and one nonprofit agency that focused on economic development activity.

Within MSA 40380 (Rochester, NY) a community contact was made with a private community development organization which provides loans to small businesses. The contact commented on the need for small dollar loans in both the rural portions of Monroe County as well as the City of Rochester. The contact stressed that this is an opportunity for both large and small banks.

Another nonprofit agency whose mission focuses on providing affordable housing in both MSA 15380 (Buffalo-Niagara Falls, NY) and MSA 40380 (Rochester, NY) indicated a need for more rehabilitation loans as many of the homes in both MSAs are old and have deteriorated. The contact also indicated a need for more loans to multifamily properties that provide affordable rental housing.

#### **PERFORMANCE CONTEXT**

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from

publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

### Demographic Characteristics

The MSA 40380 (Rochester, NY) assessment area includes Livingston, Monroe, Ontario, Orleans, and Wayne Counties. According to the 2010 Census, the population of the assessment area was approximately 1.1 million, with 71.0% residing in Monroe County, which includes the City of Rochester. The other four counties are predominately rural and suburban and are much less densely populated. Monroe County's population density is about 10 times higher than the rest of the metropolitan area and nearly three times the state-wide average. The fastest-growing of these five counties has been Ontario, with an 8.0% growth between 2000 and 2010.

### Income Characteristics

MSA 40380 (Rochester, NY) has 263,731 families, of which 20.7% are considered low-income, 17.6% are moderate-income, and 8.9% have incomes below the poverty level. According to FFIEC data, the estimated MFI for the assessment area was \$66,600 in 2013, representing a slight decrease when compared to \$68,700 in 2012.

### Housing Characteristics

The 2010 Census reports that MSA 40380 (Rochester, NY) has 451,982 housing units, of which 63.0% are owner-occupied and 27.8% are rental units. Of the available owner-occupied units, 16.3% are located in LMI areas.

During the evaluation period, housing prices increased slightly. According to NAR, the median sales price for existing single-family homes in the MSA was \$126,300 in 2013 and \$124,200 in 2012. Home values across the Rochester area tend to be below the nationwide average, about a third lower than for the US, and 60.0% below the state-wide median. Over the past decade, home prices in the area have been far more stable than nationwide or statewide average prices, as MSA 40380 (Rochester, NY)'s housing market experienced neither a large boom nor a large bust during the crisis.

### Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 45,379 businesses in 2013, of which 88.9% were small businesses with GAR of \$1 million or less.

MSA 40380 (Rochester, NY)'s key industry has been photographic equipment and related manufacturing, which has resulted in a well-educated, high-tech workforce. Prior to 2000, its industry mix and the presence of a number of large multinational headquarters had enabled the local economy to weather recessions better than almost any other part of the state. However, the

MSA sustained huge job losses during the 2001 recession and hasn't fully recovered. In the most recent recession, employment fell by almost 4.0%. Manufacturing has been especially hit hard with the area losing half its manufacturing jobs over the past 15 years. However, employment in most other private industries has rebounded in recent years. Unemployment rates for the assessment area continue to trend downward, consistent with the nationwide average. Unemployment rates for this area ranged from a high of 8.8% in February 2012 to 6.1% in December 2013. Comparatively, nationwide unemployment rates ranged from 8.3% in 2012 to 6.7% in 2013.

The educational profile of the population is slightly more advanced than that of the nation, with 31.0% of adults holding college degrees, slightly below the statewide figure of 32.0% but above the nationwide average of 28.0%.

Additional performance context data for this assessment area is provided in the MSA 40380 (Rochester, NY) Assessment Area Demographics table on the next page.

Assessment Area Demographics								
Assessment Area: MSA 40380								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	41	15.4	17,940	6.8	7,533	42.0	54,480	20.7
Moderate-income	47	17.6	38,859	14.7	6,205	16.0	46,293	17.6
Middle-income	121	45.3	140,083	53.1	8,027	5.7	58,264	22.1
Upper-income	51	19.1	66,849	25.3	1,624	2.4	104,694	39.7
Unknown-income	7	2.6	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>267</b>	<b>100.0</b>	<b>263,731</b>	<b>100.0</b>	<b>23,389</b>	<b>8.9</b>	<b>263,731</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	42,153	9,012	3.2	21.4	24,266	57.6	8,875	21.1
Moderate-income	76,197	37,425	13.1	49.1	29,944	39.3	8,828	11.6
Middle-income	235,225	159,962	56.1	68.0	56,420	24.0	18,843	8.0
Upper-income	98,393	78,560	27.6	79.8	15,034	15.3	4,799	4.9
Unknown-income	14	10	0.0	71.4	4	28.6	0	0.0
<b>Total Assessment Area</b>	<b>451,982</b>	<b>284,969</b>	<b>100.0</b>	<b>63.0</b>	<b>125,668</b>	<b>27.8</b>	<b>41,345</b>	<b>9.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4,303	9.5	3,545	8.8	589	17.3	169	10.4
Moderate-income	6,194	13.6	5,416	13.4	497	14.6	281	17.2
Middle-income	22,897	50.5	20,472	50.7	1,543	45.3	882	54.1
Upper-income	11,932	26.3	10,877	27.0	760	22.3	295	18.1
Unknown-income	53	0.1	37	0.1	14	0.4	2	0.1
<b>Total Assessment Area</b>	<b>45,379</b>	<b>100.0</b>	<b>40,347</b>	<b>100.0</b>	<b>3,403</b>	<b>100.0</b>	<b>1,629</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.9</b>		<b>7.5</b>		<b>3.6</b>

Based on 2010 ACS Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 40380 (ROCHESTER, NY)

### LENDING TEST

M&T's performance under the lending test in MSA 40380 (Rochester, NY) was good. This conclusion is based on adequate lending activity performance, good geographic and borrower distribution performance, and a relatively high level of community development loans. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

## **Lending Activity**

M&T's lending levels in MSA 40380 (Rochester, NY) reflect adequate responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's 2013 lending levels, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was above the aggregate's lending activity.

M&T's market share of deposits in the assessment area increased, while its market share of lending was stable, with the exception of home purchase lending, which increased. In 2013, M&T had deposit market share of 25.0%, and lending market share of 7.0% in home purchase lending, 3.0% in refinance lending, 4.0% in home improvement lending, and 5.0% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 19.0%, and lending market share was 5.0% in home purchase lending, 4.0% in refinance lending, 3.0% in home improvement lending, and 5.0% in small business lending.

HMDA and small business volumes in 2013 increased by 17.0% compared to the last evaluation. This increase was driven primarily by increases in home purchase (48.0%), refinance (3.0%), and home improvement (17.0%) loan volumes, while partially offset by decrease in small business loan volume (-1.0%). Comparisons to the aggregate data for the evaluation period indicated overall increased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was below the lending volume of similarly-situated banks.

## **Geographic Distribution**

M&T's overall geographic distribution of loans reflects good penetration in the MSA 40380 (Rochester, NY) assessment area. Lending penetration in LMI geographies was excellent for home purchase and home improvement lending, good for small business lending and adequate for refinance lending. M&T demonstrated overall low level of lending gaps with consistent lending levels between 2012 and 2013. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	41	9	78%
Moderate	47	6	87%
Middle	121	3	98%
Upper	51	0	100%
<b>2012</b>			
Low	41	9	78%
Moderate	47	6	87%
Middle	121	3	98%
Upper	51	0	100%

*Home Purchase*

The overall geographic distribution of home purchase lending in LMI census tracts was excellent based on excellent performance in moderate-income census tracts and good performance in low-income census tracts. M&T’s home purchase lending in low-income census tracts was good because M&T’s performance compared favorably to the 2012 and 2013 aggregate of all lenders. In 2013, M&T made 2.8% of its home purchase loans by number and 1.3% by dollar volume in low-income census tracts which was consistent with the percentage of owner-occupied housing units also at 3.2% and the aggregate performance at 2.2% by number and 1.3% by dollar volume in low-income geographies. Home purchase lending in 2012 was comparable to 2013.

Home purchase lending in moderate-income census tracts was excellent M&T’s performance exceeded the 2012 and 2013 aggregate of all lenders in the moderate-income geographies. In 2013, M&T made 14.9% by number and 7.6% by dollar volume of its home purchase loans in moderate-income census tracts which compared favorably to the demographic which had 13.1% of owner-occupied housing units in moderate-income census tracts. Performance also compared favorably to the aggregate which made 11.5% by number and 7.1% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase lending in 2012 was below 2013’s performance.

*Refinance*

The overall geographic distribution of refinance loans in LMI census tracts was adequate based on adequate performance in both geographies. The distribution of refinance lending in low-income census tracts was adequate based on comparable performance to the number of aggregate lending in low-income census tracts. In 2013, M&T made 1.7% by number and 1.1% by dollar volume of its refinance loans in low-income census tracts which was below the percentage of owner-occupied housing units at 3.2% but slightly above the aggregate which made 1.4% by number and 0.8% by dollar volume of its refinance loans in low-income census tracts. Refinance lending in 2012 was comparable to 2013.

M&T's refinance lending in moderate-income census tracts was adequate as performance was below the proxy but similar to the aggregate. In 2013, M&T made 8.9% by number and 6.3% by dollar volume of its refinance loans in moderate-income census tracts which was below the percentage of owner-occupied housing units at 13.1% but similar to the aggregate which also made 8.9% by number and 8.5% by dollar volume of its refinance loans in moderate-income census tracts. Refinance lending in 2012 was comparable to 2013.

### *Home Improvement*

The overall distribution of home improvement loans was excellent based on excellent performance in LMI census tracts. Home improvement lending in low-income census tracts was excellent because M&T's performance exceeded the demographics and aggregate of all lenders in low-income tracts. In 2013, M&T made 3.7% by number and 1.9% by dollar volume of its home improvement loans in low-income census tracts which compared favorably to the percentage of owner-occupied housing units at 3.2% and exceeded the aggregate which made 2.8% by number and 1.2% by dollar volume of its home improvement loans in low-income census tracts. Home improvement lending in 2012 was comparable to 2013's lending in low-income census tracts.

M&T's home improvement lending in moderate-income census tracts was also excellent due to M&T's performance exceeding the demographics and aggregate lending activities in moderate-income census tracts. In 2013, M&T made 16.9% by number and 10.5% by dollar volume of its home improvement loans in moderate-income census tracts which exceeded the demographics of the assessment area, which indicate that 13.1% of the owner-occupied housing units are located in moderate-income census tracts. Home improvement lending also exceeded the aggregate which made 14.8% by number and 8.1% by dollar volume of its home improvement loans in moderate-income census tracts. Home improvement lending in 2012 was comparable to performance in 2013.

### *Small Business*

The overall distribution of small business loans in LMI census tracts was good based on excellent distribution in low-income tracts and adequate distribution in moderate-income tracts. 2013, M&T's small business lending in low-income census tracts was excellent because the 2012 and 2013 lending activity exceeded demographics and aggregate lending. M&T originated 15.2% by number and 14.9% by dollar volume of its small business loans in low-income census tracts which was above the demographics, with 9.5% of businesses operating in low-income census tracts. Small business lending was also above the aggregate's performance which had 8.0% by number and 10.8% by dollar volume of its small business loans in low-income census tracts. Small business lending in 2012 was comparable to performance in 2013.

In 2013, M&T's small business lending in moderate-income census tracts was adequate because of comparable aggregate lending activity. M&T originated 9.8% by number and 8.7% by dollar



volume of its small business loans in moderate-income census tracts, which was below the aggregate's 10.7% by number and 11.2% by dollar volume of small business loans in moderate-income census tracts. Small business lending was also below the demographics that indicated that 13.6% of businesses operate in moderate-income census tracts. Small business lending in 2012 was comparable to performance in 2013.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 40380 (Rochester, NY) assessment area reflects good penetration. Overall, HMDA lending to LMI borrowers and to small businesses was good.

#### *Home Purchase*

The overall distribution of home improvement loans to LMI borrowers was excellent based on excellent distribution to moderate-income borrowers and good distribution to low-income borrowers. M&T's home purchase lending to low-income borrowers was good due to favorable performance to aggregate lending. M&T made 15.3% by number and 6.0% by dollar volume of its home purchase loans to low-income borrowers when 20.7% of families in the MSA assessment area are low-income. Home purchase performance was above the performance of the aggregate which made 9.5% by number and 5.1% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2013 home purchase performance exceeded its 2012 performance.

Home purchase lending to moderate-income borrowers was excellent because M&T exceeded demographics and aggregate lending activity to moderate-income borrowers. M&T made 31.1% by number and 17.5% by dollar volume of its home purchase loans to moderate-income borrowers when 17.6% of families in the MSA assessment area are of moderate-income. Home purchase performance was above the aggregate which made 23.1% by number and 16.9% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance was also excellent.

#### *Refinance*

Refinance lending to LMI borrowers was good based on excellent distribution to moderate-income borrowers while the distribution was adequate to low-income borrowers. Refinance lending to low-income borrowers was adequate as M&T made 6.0% by number and 3.2% by dollar volume of refinance loans were to low-income borrowers compared to 20.7% of families in the MSA assessment area which are of low-income. Performance was slightly below the aggregate which made 7.0% by number and 3.1% by dollar volume of its refinance loans to low-income borrowers. Of the total housing units in the low-income census tracts, 78.7% consists of

rental and vacant units, which limits opportunities for refinance transactions. M&T's 2012 refinance performance was comparable.

Refinance lending to moderate-income borrowers was excellent because M&T's performance exceeded demographics and aggregate lending to moderate-income borrowers. M&T made 17.8% by number and 13.0% by dollar volume of its refinance loans to moderate-income borrowers when 17.6% of families in the MSA assessment area are of moderate-income. Refinance performance was above the aggregate which made 17.4% by number and 10.0% by dollar volume of its refinance loans to moderate-income borrowers. M&T's 2012 refinance was also excellent.

### *Home Improvement*

Home improvement performance was excellent based on excellent distribution to moderate-income borrowers and good distribution to low-income borrowers. M&T's home improvement lending to low-income borrowers was good based on a favorable performance compared to aggregate lending. M&T made 15.4% by number and 11.4% by dollar volume of its home improvement loans to low-income borrowers when 20.7% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 12.1% by number and 5.1% by dollar volume of its home improvement loans to low-income borrowers. Home improvement performance in 2013 exceeded 2012's performance.

Home improvement lending to moderate-income borrowers was excellent because M&T's performance exceeded demographics and aggregate lending to moderate-income borrowers. M&T made 27.2% by number and 12.8% by dollar volume of its home improvement loans to moderate-income borrowers when 17.6% of families in the MSA assessment area are of moderate-income. Home improvement performance was above the aggregate which made 25.5% by number and 17.3% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent.

### *Small Business*

M&T provided a good level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 54.0% by number and 32.1% by dollar volume of its small business loans to these businesses, compared to the 8.8% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 40.0% by number and 34.8% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 56.1% by number and 14.1% by dollar volume of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 91.3% by number and 29.8% by dollar volume of its small business loans in amounts of \$100,000 or less.

Small business lending performance in 2012 was comparable to the bank’s performance in 2013 as the percentage of loans to businesses with GAR of \$1 million or less was below the demographic but exceeded the aggregate. In 2012, 55.9% of small business loans were in amounts of \$100,000 or less compared to the aggregate’s 95.5%.

**Community Development Lending**

As shown in the table to the right, M&T had a relatively high level of community development lending activity in MSA 40380 (Rochester, NY) with 33 loan originations totaling \$120.5 million or 10.0% of the bank’s New York State community development lending. Performance within MSA 40380 (Rochester, NY) was directed at affordable housing and economic development initiatives, which represented 54.0% and 31.3% by dollar volume of community development lending in the assessment area, respectively. This conclusion was supported by a favorable comparison to five similarly-situated large retail banks in the assessment area.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	11	\$65,075
Community Services	5	\$12,534
Economic Development	13	\$37,751
Revitalize and Stabilize	4	\$5,126
<b>Total</b>	<b>33</b>	<b>\$120,486</b>

Examples of community development initiatives included:

- A \$5 million working capital loan to a nonprofit organization that develops affordable housing and LIHTC projects in the City of Rochester. The organization seeks to develop productive partnerships with private and public funding sources, developers, and government to develop affordable housing in the City of Rochester.
- A \$7 million working capital loan to a Rochester based developer of affordable housing and LIHTC projects throughout the eastern United States. The company’s portfolio consists of over 225 properties and 25,000 housing units.
- A \$1.9 million participation in a \$16 million line of credit to a nonprofit corporation that is engaged in the acquisition and rehabilitation of single family homes, which will be sold to LMI buyers. The organization reclaims city property and offers affordable housing by construction and renovation.

**INVESTMENT TEST**

As shown in the table to the right, M&T’s made a significant level of qualified investments and grants in MSA 40380 (Rochester, NY) occasionally in a leadership position, with \$47.2 million of qualified investments dedicated to activities inside MSA 40380 (Rochester, NY). Total qualified investments

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	23	\$46,380
Community Services	92	\$846
Economic Development	1	\$10
<b>Total</b>	<b>116</b>	<b>\$47,236</b>

made in MSA 40380 (Rochester, NY) accounted for 19.3% of total New York State qualified investments. Of the total assessment area investments, \$3 million or 6.0% were new investments made in the current evaluation period and \$44 million were prior period investments. M&T's level of qualified investments compared less favorably to that of similarly-situated large retail banks operating in the assessment area.

M&T made extensive use of complex investments to support community development initiatives, with 97.0% of assessment area investments made in LIHTC projects. M&T also exhibited excellent responsiveness to the credit and community development needs of the assessment area, with investment activities primarily targeting affordable housing projects. The following are examples of qualified investments that met critical needs in the assessment area:

- Sixteen LIHTC projects totaling \$46 million to support affordable housing.
- Multiple charitable donations totaling \$883,000 to community development organizations that support affordable housing, economic development, and community services to LMI individuals throughout this assessment area.

## **SERVICE TEST**

M&T's performance under the service test in MSA 40380 (Rochester, NY) was good based on being a leader in providing community development services within the assessment area, delivery systems that were reasonably accessible to all portions of the assessment area and changes in branch locations did not adversely affect accessibility, and hours and services are tailored to the convenience and needs of the assessment area.

## **Retail Services**

M&T's delivery systems were reasonably accessible to geographies and individuals of different income levels in the assessment area. M&T operated 32 branches in MSA 40380 (Rochester, NY), of which two (6.0%) were located in low-income areas and three (9.0%) were in moderate-income areas. This compares reasonably to the 9.0% and 16.0% of the MSA's population that resides in low- and in moderate-income areas, respectively.

Alternative delivery systems slightly enhanced the bank's performance in the assessment area. M&T had 15 off-site ATM locations in the MSA; two (13.0%) of which were located in low-income tracts and one (7.0%) was in a moderate-income tract.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in MSA 40380 (Rochester, NY).

The bank's hours and services are tailored to the convenience and needs of the assessment area, particularly LMI geographies or LMI individuals. Of the 32 branches in the MSA, 31 or 97.0% had early morning, late evening hours or Saturday hours. Of the five branches in LMI census tracts, four or 80.0% had extended or Saturday hours.

### Community Development Services

M&T was a leader in providing community development services in MSA 40380 (Rochester, NY). The table to the right shows the number and type of services the bank performed during the evaluation period. Most of the seminars covered mortgage lending topics for LMI borrowers.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	544
Financial Literacy	15
Technical Assistance	20
<b>Total</b>	<b>579</b>

In addition, management and staff served as directors, advisors or committee members to 48 nonprofit and community based organizations in MSA 40380 (Rochester, NY).

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS MSA 45060 (SYRACUSE, NY)

As of December 31, 2013, M&T operated 29 branches in MSA 45060 (Syracuse, NY), representing 14.0% of the bank's branches in New York. Based on the FDIC Deposit Market Share Report, M&T held \$2.6 billion or 9.0% of its total deposit base in the MSA as of June 30, 2013. M&T captured a deposit market share of 27.0%, ranking 1<sup>st</sup> in deposits among the 19 depository institutions operating in this assessment area. Other financial institutions with a significant deposit market share included Key Bank National Association, First Niagara Bank, NA; JP Morgan Chase, NBT Bank, N.A.; and Bank of America, N.A. Of the bank's total HMDA-related and small business originations in the New York State assessment areas, M&T attained 11.0% of its lending in this MSA.

#### Community Contacts

In order to learn more about community credit needs, examiners conducted interviews and received comments from three nonprofit agencies that are actively involved with affordable housing.

The first contact operates as a community housing development organization that creates housing opportunities for individuals and families in central New York. It indicated that there is an oversupply of housing but a lack of good quality housing available. The contact indicated that about 10.0% of the houses in the City of Syracuse were vacant. The contact indicated a need for home rehabilitation lending and funding for the demolition of older buildings. He also stated a need for capital for contractors. The contact indicated that all banks within the city both large and small are meeting the credit needs and services of the city.

A second contact also dealt with affordable housing. The contact stressed the need housing renovation or rehabilitation projects in the north, south and west side areas of the city. The contact stated that many individuals lack the financial capacity for down payments. They have insufficient incomes to afford housing. The contact indicated there are opportunities for banks to provide community development loans and investments. Secondly, Syracuse has a large refugee population and there is a need for fair lending housing training.

The third contact indicated a need for real estate investment capital to purchase vacant real estate. He also stated that the supply of affordable rental properties is sufficient but the quality is below standard. There is a need for grants and/or loans to upgrade and improve the quality of affordable rentals.

## PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

### Demographic Characteristics

M&T's assessment area in MSA 45060 (Syracuse, NY) includes Onondaga and Madison Counties. According to the 2010 Census, the population of the assessment area was approximately 540,468, with the majority of the population residing in the City of Syracuse and the surrounding county of Onondaga. The remaining areas are predominately suburban and rural and much less densely populated.

### Income Characteristics

There are 132,238 families residing in the MSA, of which 20.8% are considered low-income, 16.4% are moderate-income, and 9.3% live below the poverty level. The MFI in the assessment area was \$65,800 in 2013; however, the MFI for the City of Syracuse is much lower than the MSA, with the city median household income at \$31,365. Home ownership remains a challenge for LMI borrowers in the city in light of the low income range.

### Housing Characteristics

The 2010 Census reports that the MSA 45060 (Syracuse, NY) is comprised of 233,114 housing units, of which 141,488 units or 60.7% were owner-occupied. Approximately 15.8% of all owner-occupied units in the MSA were located in LMI census tracts.

During the evaluation period, housing prices increased slightly. According to NAR, the median sales price for existing single-family homes in the MSA was \$125,500 in 2013 and \$124,800 in 2012.

### Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 25,320 businesses in 2013, of which 88.4% were small businesses with GAR of \$1 million or less. The Syracuse industry mix closely parallels that of the nation, with manufacturing accounting for roughly 11.0% of employment. In particular, computer and electronics manufacturing is highly concentrated in the metropolitan area, especially in Onondaga County.

Educational services are also a major industry, led by Syracuse University in Onondaga County and Colgate University in Madison County. According to the 2010 Census, 28.0% of adults held a college degree, slightly above the nationwide level but below the statewide average.

In terms of economic performance, the area's economy lagged the nation's during the most recent economic expansion; employment grew only marginally, while home prices rose by roughly 50.0% from 2000-2007, compared with a nearly 100.0% increase on a national level. However, the MSA weathered the economic downturn better than the nation: employment fell by roughly 4.0%, compared to a 6.5% decline nationwide. The unemployment rate for this assessment area has improved since the prior evaluation, with an unemployment rate of 7.8% in 2013 as compared to 8.4% at the prior evaluation.

Additional performance context data for this assessment area is provided in the MSA 45060 (Syracuse, NY) Assessment Area Demographics table on the next page.



Assessment Area Demographics								
Assessment Area: MSA 45060								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	25	16.0	11,377	8.6	4,680	41.1	27,564	20.8
Moderate-income	28	17.9	18,058	13.7	2,927	16.2	21,658	16.4
Middle-income	53	34.0	52,915	40.0	3,329	6.3	27,608	20.9
Upper-income	49	31.4	49,881	37.7	1,323	2.7	55,408	41.9
Unknown-income	1	0.6	7	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>156</b>	<b>100.0</b>	<b>132,238</b>	<b>100.0</b>	<b>12,259</b>	<b>9.3</b>	<b>132,238</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	29,056	5,288	3.7	18.2	17,792	61.2	5,976	20.6
Moderate-income	38,433	17,127	12.1	44.6	17,402	45.3	3,904	10.2
Middle-income	89,215	60,630	42.9	68.0	20,764	23.3	7,821	8.8
Upper-income	76,296	58,436	41.3	76.6	12,947	17.0	4,913	6.4
Unknown-income	114	7	0.0	6.1	0	0.0	107	93.9
<b>Total Assessment Area</b>	<b>233,114</b>	<b>141,488</b>	<b>100.0</b>	<b>60.7</b>	<b>68,905</b>	<b>29.6</b>	<b>22,721</b>	<b>9.7</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	3,642	14.4	3,039	13.6	446	22.2	157	17.0
Moderate-income	3,056	12.1	2,635	11.8	280	13.9	141	15.3
Middle-income	10,006	39.5	8,766	39.2	885	44.0	355	38.5
Upper-income	8,611	34.0	7,941	35.5	401	19.9	269	29.2
Unknown-income	5	0.0	4	0.0	1	0.0	0	0.0
<b>Total Assessment Area</b>	<b>25,320</b>	<b>100.0</b>	<b>22,385</b>	<b>100.0</b>	<b>2,013</b>	<b>100.0</b>	<b>922</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.4</b>		<b>8.0</b>		<b>3.6</b>

Based on 2010 ACS Information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 45060 (SYRACUSE, NY)**

### **LENDING TEST**

M&T's performance under the lending test in MSA 45060 (Syracuse, NY) was good. This conclusion is based on adequate lending activity performance, good geographic and borrower distribution performance, and being a leader in making community development loans. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

#### **Lending Activity**

M&T's lending levels in MSA 45060 (Syracuse, NY) reflect adequate responsiveness to assessment area credit needs. Additionally, the bank has a low level of lending gaps throughout the assessment area. This conclusion was based on consideration of the bank's lending volumes in the current evaluation period in comparison to the prior evaluations, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was above the aggregate's lending activity.

M&T's market share of deposits in the assessment area increased compared to the last evaluation, while its market share of lending was stable, with the exception of home purchase lending, which increased.

HMDA and small business volumes in 2013 increased by 7.0% compared to the last evaluation. This increase was driven by increases in home purchase (40.0%), home improvement (12.0%), and small business (1.0%) loan volumes, partially offset by decreased refinance (-11.0%) loan volume. Comparisons to the aggregate data for the evaluation period indicated overall increased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was below the lending volume of similarly-situated banks.

#### **Geographic Distribution**

M&T's overall geographic distribution of loans reflects good penetration in the MSA 45060 (Syracuse, NY) assessment area. Lending penetration in LMI census tracts was good for home purchase lending, home improvement, and small business lending, and adequate for refinance lending. M&T demonstrated overall low level of lending gaps with consistent lending levels between 2012 and 2013. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	25	2	92%
Moderate	28	4	86%
Middle	53	0	100%
Upper	49	0	100%
<b>2012</b>			
Low	25	3	88%
Moderate	28	2	93%
Middle	53	0	100%
Upper	49	1	98%

### *Home Purchase*

The overall distribution of home purchase loans in LMI census tracts was good based on good performance in moderate-income census tracts and adequate performance in low-income tracts. M&T's home purchase lending in low-income census tracts was adequate based on comparable performance to the number of aggregate lending. In 2013, M&T made 1.9% by number and 0.8% by dollar volume of its home purchase loans in low-income census tracts which was below the demographic which indicated that 3.7% of the owner-occupied housing units were located in low-income census tracts. M&T's lending performance was consistent with the aggregate which made 2.1% by number and 1.2% by dollar volume of its home purchase loans in low-income census tracts. Home purchase lending in 2012 exceeded 2013's performance.

Home purchase lending in moderate-income census tracts was good. In 2013, M&T made 12.7% by number and 8.3% by dollar volume of its home purchase loans in moderate-income census tracts which compared favorably to the demographic which indicated that 12.1% of owner-occupied housing units were located in moderate-income census tracts. M&T's performance also was similar to the aggregate which made 13.0% by number and 8.3% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase lending in 2012 was below 2013's performance.

### *Refinance*

The overall distribution of refinance loans in LMI census tracts was adequate based on adequate performance in LMI census tracts. Refinance lending in low-income census tracts was adequate based on comparable performance to aggregate lending in low-income census tracts. In 2013, M&T made only one loan or 0.4% by number and 0.2% dollar volume of its refinance loans in low-income census tracts. Refinance lending was below the demographic which indicated that 3.7% of owner-occupied housing units are located in low-income census tracts. Refinance lending was similar to the aggregate which made 1.2% by number and 0.5% by dollar volume of its refinance loans in low-income census tracts. Refinance lending in 2012 exceeded 2013's

lending. Of the total housing units in the low-income census tracts, 81.8% consists of rental and vacant units which limit opportunities for refinance transactions.

M&T's refinance lending in moderate-income census tracts was adequate. In 2013, M&T made 8.8% by number and 5.2% by dollar volume of its refinance loans in moderate-income census tracts which was below the 12.1% of owner-occupied housing units located in moderate-income census tracts. However, M&T's refinance lending was favorable compared to the aggregate which made 8.3% by number and 4.3% by dollar volume of its refinance loans in moderate-income census tracts. Refinance lending in 2012 was comparable to 2013.

### *Home Improvement*

The overall distribution of home improvement loans in LMI census tracts was good based on excellent performance in low-income census tracts and adequate performance in moderate-income tracts. Home improvement lending in low-income census tracts was excellent because M&T's performance exceeded demographics and aggregate lending in low-income census tracts. In 2013, M&T made 5.7% by number and 8.1% by dollar volume of its home improvement loans in low-income census tracts which compared favorably to the 3.7% of owner-occupied housing units located in low-income census tracts. M&T's home improvement performance also exceeded the aggregate which made 4.2% by number and 2.3% by dollar volume of its home improvement loans in low-income census tracts. Home improvement lending in 2012 was below 2013's lending in low-income census tracts.

M&T's home improvement lending in moderate-income census tracts was adequate when compared to aggregate lending activity in moderate-income census tracts. The bank's home improvement lending was below the demographics of the assessment area, which indicate that 12.1% of the available owner-occupied housing units are located in moderate-income census tracts compared to the bank's 8.2% by number and 14.4% by dollar volume of home improvement loans. Home improvement lending was also below the aggregate which made 12.7% by number and 7.5% by dollar volume of its home improvement loans in moderate-income census tracts. Home improvement lending in 2012 exceeded performance in 2013.

### *Small Business*

The overall distribution of small business loans in LMI census tracts was good based on good performance in LMI census tracts. In 2013, M&T's small business lending in low-income census tracts was good. M&T originated 14.2% by number and 21.1% by dollar volume of its small business loans in low-income census tracts which was similar to the demographics that indicated that 14.4% of businesses are located in low-income census tracts. Small business lending was also consistent with the aggregate's performance which also made 13.5% by number and 18.9% by dollar volume of its small business loans in low-income census tracts. Small business lending in 2012 exceeded performance in 2013.

In 2013, M&T's small business lending in moderate-income census tracts was good. M&T originated 11.0% by number and 6.9% by dollar volume of its small business loans in moderate-income census tracts, which was below the demographics which indicate that 12.1% of businesses are located in moderate-income census tracts. However, M&T's small business performance was consistent with the aggregate which made 10.6% by number and 10.3% by dollar volume of its small business loans in moderate-income census tracts. Small business lending in 2012 was comparable to performance in 2013.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 45060 (Syracuse, NY) assessment area reflects good penetration. Overall, lending to LMI borrowers and to small businesses was good.

#### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was adequate based on adequate performance to moderate-income borrowers and poor performance to low income borrowers. M&T's home purchase lending to low-income borrowers was poor based on M&T's low level of lending to low-income borrowers compared to aggregate. M&T made 4.6% by number and 2.4% by dollar volume of its home purchase loans to low-income borrowers when 20.8% of families in the MSA assessment area are of low-income. However, the high percentage of low-income families indicates that fewer families will qualify for home purchase loans. Home purchase performance was below the performance of the aggregate which made 8.1% by number and 4.4% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2013 home purchase performance was comparable to its 2012 performance.

Home purchase lending to moderate-income borrowers was adequate. M&T made 13.5% by number and 9.7% by dollar volume of its home purchase loans to moderate-income borrowers when 16.4% of families in the MSA assessment area are of moderate-income. Home purchase performance was below the aggregate which made 22.6% by number and 16.7% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance exceeded its 2013 performance.

#### *Refinance*

The overall distribution of refinance loans to LMI borrowers was adequate based on good performance to moderate-income borrowers and poor performance to low income borrowers. Refinance lending to low-income borrowers was poor as 3.5% by number and 2.2% by dollar volume of refinance loans were to low-income borrowers compared to 20.8% of families in the MSA assessment area which are of low-income. Performance however, was below the aggregate

which made 6.2% by number and 2.6% by dollar volume of its refinance loans to low-income borrowers. M&T's 2012 refinance performance was comparable.

Refinance lending to moderate-income borrowers was good. M&T made 13.1% by number and 8.2% by dollar volume of its refinance loans to moderate-income borrowers when 16.4% of families in the MSA assessment area are of moderate-income. Refinance performance was below the aggregate which made 14.9% by number and 7.9% by dollar volume of its refinance loans to moderate-income borrowers. M&T's 2012 refinance was comparable.

### *Home Improvement*

The overall distribution of home improvement loans to LMI borrowers was excellent based on excellent performance to moderate-income borrowers and good performance to low income borrowers. M&T's home improvement lending to low-income borrowers was good. M&T made 13.1% by number and 4.9% by dollar volume of its home improvement loans to low-income borrowers when 20.8% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 9.5% by number and 3.6% by dollar volume of its home improvement loans to low-income borrowers. Home improvement performance in 2013 exceeded 2012's performance.

Home improvement lending to moderate-income borrowers was excellent. M&T made 21.3% by number and 6.0% by dollar volume of its home improvement loans to moderate-income borrowers when 16.4% of families in the MSA assessment area are of moderate-income. Home improvement performance was below the aggregate which made 21.8% by number and 14.6% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent.

### *Small Business*

M&T provided a good level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 54.0% by number and 35.2% by dollar volume of its small business loans to these businesses, compared to the 88.4% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 39.1% by number and 29.3% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 56.1% by number and 14.4% by dollar volume of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 91.0% by number and 26.4% by dollar volume of small business loans in amounts of \$100,000 or less. Small business lending performance in 2012 was comparable to the bank's performance in 2013 as the percentage of loans to businesses with GAR of \$1 million or less was below the demographic but exceeded the aggregate. In 2012, 59.6% of small business loans were in amounts of \$100,000 or less compared to the aggregate's 95.5%.

### Community Development Lending

As shown in the table to the right, M&T's was a leader in community development lending activity in MSA 45060 (Syracuse, NY) with 22 loan originations totaling \$212.4 million, or 18.2% of the bank's community development activity in New York State. M&T's lending efforts were targeted to revitalization and stabilization, which represented \$180.3 million or 84.9% of community development lending activity. M&T ranked 1st out of five similarly-situated banks when comparing annualized community development loans to deposits within MSA 45060 (Syracuse, NY).

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	3	\$5,000
Community Services	2	\$2,830
Economic Development	5	\$24,318
Revitalize and Stabilize	12	\$180,257
<b>Total</b>	<b>22</b>	<b>\$212,405</b>

Examples of community development initiatives included but were not limited to:

- A \$30 million loan to a hospital located in a low-income tract in an area designated as Syracuse's Federal Renewal Community. The loan will be used to finance a co-generation facility as well as an electronic medical record system. The hospital will help revitalize the local community and bring many jobs for its residents.
- A \$3.6 million loan to finance demolition and site work of the former Kennedy Square Public Housing site in Syracuse. The site is currently vacant and consists of several apartment buildings that were vacated several years ago when the public housing project failed. The loan is the first step in a project to revitalize the area with office, residential, and retail properties. The project in part financed with grants from New York State's Empire Development Corporation.
- A \$20 million loan to finance renovations to a nursing facility for seniors. Over 50% of the revenues of the facility come from Medicaid indicating support of a largely LMI population.

### INVESTMENT TEST

As shown in the table to the right, M&T made a significant level of qualified investments and grants in MSA 45060 (Syracuse, NY) occasionally in a leadership position, with \$39 million of qualified investments dedicated to activities inside MSA 45060 (Syracuse, NY). Total qualified investments made in MSA 45060 (Syracuse, NY) accounted for 16.0% of total New York State qualified investments. Of the assessment area investments, \$6.7 million or 22.0% were new investments made in the current evaluation period while \$32.5 million were

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	12	\$10,103
Community Services	63	\$28,820
<b>Total</b>	<b>75</b>	<b>\$38,923</b>

prior period investments. M&T's level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

M&T made occasional use of complex investments to support community development initiatives, with 26.0% of assessment area investments made in LIHTC projects. M&T also exhibited excellent responsiveness to the credit and community development needs of the assessment area, with investment activities primarily targeting community services for LMI individuals. The following are examples of qualified investments that met critical needs in the assessment area:

- A \$28 million tax-exempt bond to support a health care facility in a low-income tract in Onondaga County.
- A \$6 million LIHTC investment for a new construction project that will create 50 units of affordable rental housing primarily for homeless veterans.
- Multiple grants totaling \$586,000 to organizations that support affordable housing and community services to LMI individuals throughout this assessment area.

## **SERVICE TEST**

M&T's performance under the service test in MSA 45060 (Syracuse, NY) was good based on delivery systems that were accessible to all portions of the assessment area and individuals of different income levels, changes in branch locations did not adversely affect accessibility, and hours and services that are tailored to the convenience and needs of the assessment area. M&T provided a relatively high level of community development services provided within the assessment area.

### **Retail Services**

M&T's delivery systems were accessible to geographies and individuals of different income levels in this assessment area. M&T operated 29 branches in MSA 45060 (Syracuse, NY). Four (14.0%) of these branches were located in low-income areas and two (7.0%) were in moderate-income areas, in comparison to 12.0% and 15.0% of the MSA's population residing in low- and in moderate-income areas, respectively.

Alternative delivery systems slightly enhanced M&T's performance in the assessment area. M&T had 5 off-site ATM locations in MSA 45060 (Syracuse, NY) with one (20.0%) located in a low-income tracts.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. M&T did not open or close any branches in MSA 45060 (Syracuse, NY) during the evaluation period.



The bank's products and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies or LMI individuals. Of the 29 branches in the MSA, 27, or 93.0%, have early morning, late evening, or Saturday hours. Of the six branches in LMI census tracts, three or 50.0% had extended or Saturday hours.

### Community Development Services

M&T provided a relatively high level of community development services in MSA 45060 (Syracuse, NY). The table to the right shows the type and number of community development services the bank performed during the evaluation period. In addition, management and staff served as directors, advisors or committee members to 14 nonprofit and community based organizations throughout the bank's assessment area.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	226
Financial Literacy	14
Technical Assistance	2
<b>Total</b>	<b>242</b>

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 13780 (BINGHAMTON, NY)

As of December 31, 2013, M&T operated 14 branches in the MSA 13780 (Binghamton, NY), representing 7.0% of the bank's branches in New York. As of June 30, 2013, M&T held \$1.4 billion or 5.0% of its total deposit base in MSA 13780 (Binghamton, NY). Of the bank's total HMDA-related and small business originations made in the assessment area, M&T attained 6.0% of lending in this MSA.

The bank competes with several regional institutions in the region but has been quite successful in capturing the MSA market share. M&T captured a deposit market share of 51.0%, ranking 1<sup>st</sup> in deposits among the eight depository institutions operating in this assessment area. Other leaders in terms of deposit market share included First Niagara Bank, NA, NBT Bank NA, and Tioga State Bank.

### Community Contacts

In order to learn more about community credit needs, examiners conducted interviews and received comments from a local nonprofit agency that is actively involved with affordable housing.

The community contact was conducted with a nonprofit organization that provides affordable housing for low-income families. The contact noted that housing in Binghamton is aging but generally affordable. There is a need for home rehabilitation financing. The contact indicated a need for stronger involvement from financial institutions in terms of giving and direct support.

### PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

### Demographic Characteristics

Broome County, which includes the City of Binghamton, has a population of 200,600 persons, based on the 2010 Census. MSA 13780 (Binghamton, NY) also includes Tioga County, with a much sparser population of 51,125. The population has remained stable since the prior Census of 2000.

### Income Characteristics

According to 2010 Census data, 20.5% of families in the MSA were considered low-income, 18.2% are moderate-income, and 10.0% have incomes below the poverty level. However, the percentage of families living According to FFIEC data, the estimated MFI for the assessment area was \$58,600 in 2013, a decrease when compared to \$61,800 in 2012, but compares favorably with the overall New York State median income of \$57,700.

### Housing Characteristics

The 2010 Census reports that the MSA 13780 (Binghamton, NY) has 112,457 housing units, of which 70,146 units or 62.4% are owner-occupied. Of the total owner-occupied units, 12.3% were located in LMI census tracts.

During the evaluation period, housing prices increased slightly. According to NAR, the median sales price for existing single-family homes in the MSA was \$111,600 in 2013 and \$109,500 in 2012. Home prices in this area did not appreciate as rapidly as the nation during the 2000-2006 housing boom, but fell at a much lower rate than the nation during the housing crisis.

### Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 10,820 businesses in 2013, of which 89.6% were small businesses with GAR of \$1 million or less. The MSA had a sizable presence of computer and electronics and defense related manufacturing jobs, though less now than in the past. While there is still a continued concentration of high-tech firms, MSA 13780 (Binghamton, NY) is emerging as a healthcare and education focused city, with the presence of SUNY Binghamton acting as the driving force behind this revitalization. Despite the dominant presence of SUNY Binghamton, less than 25.0% of the area's adults hold college degree, which is slightly below the nationwide rate of 27.0%.

During the most recent recession, MSA 15380 (Binghamton, NY) reported a job loss of approximately 7.0%, steeper than that of the state but comparable to the nation. The unemployment rate for this assessment area has improved since the prior evaluation. The MSA reported unemployment of 7.8% in 2013, compared to 8.4% at the prior evaluation.

Additional performance context data for this assessment area is provided in the MSA 13780 (Binghamton, NY) Assessment Area Demographics table on the next page.

Assessment Area Demographics								
Assessment Area: MSA 13780								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	7.7	2,673	4.2	999	37.4	13,165	20.5
Moderate-income	13	20.0	8,339	13.0	1,508	18.1	11,673	18.2
Middle-income	31	47.7	35,102	54.7	3,110	8.9	13,733	21.4
Upper-income	16	24.6	18,016	28.1	811	4.5	25,559	39.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>65</b>	<b>100.0</b>	<b>64,130</b>	<b>100.0</b>	<b>6,428</b>	<b>10.0</b>	<b>64,130</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,894	1,582	2.3	22.9	3,874	56.2	1,438	20.9
Moderate-income	19,272	7,053	10.1	36.6	9,208	47.8	3,011	15.6
Middle-income	58,695	40,132	57.2	68.4	13,256	22.6	5,307	9.0
Upper-income	27,596	21,379	30.5	77.5	4,724	17.1	1,493	5.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>112,457</b>	<b>70,146</b>	<b>100.0</b>	<b>62.4</b>	<b>31,062</b>	<b>27.6</b>	<b>11,249</b>	<b>10.0</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	829	7.7	712	7.3	78	11.1	39	9.1
Moderate-income	1,520	14.0	1,309	13.5	141	20.1	70	16.3
Middle-income	5,603	51.8	5,088	52.5	294	42.0	221	51.5
Upper-income	2,868	26.5	2,582	26.6	187	26.7	99	23.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>10,820</b>	<b>100.0</b>	<b>9,691</b>	<b>100.0</b>	<b>700</b>	<b>100.0</b>	<b>429</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>89.6</b>		<b>6.5</b>		<b>4.0</b>	

Based on 2010 ACS Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 13780 (BINGHAMTON, NY)

### LENDING TEST

M&T's performance under the lending test in MSA 13780 (Binghamton, NY) was good. This conclusion is based on adequate lending activity performance, excellent geographic performance, good borrower distribution performance, and an adequate level of community development

loans. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in MSA 13780 (Binghamton, NY) reflect adequate responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volume in the current evaluation period in comparison to the prior evaluation period, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was below the aggregate's lending activity. There were no lending gaps in low-or moderate-income census tracts.

M&T's market share of deposits was stable in comparison to the last evaluation period while its market share of lending in the assessment area declined in comparison to the last evaluation period. In 2013, M&T had a deposit market share of 51.0% compared to a deposit market share of 50.0% during the last evaluation.

HMDA and small business volumes in 2013 decreased by 4.0% compared to the last evaluation. This decrease was driven by decreases in home purchase (-7.0%), home improvement (-3.0%), and small business (-5.0%) loan volumes, partially offset by increased refinance (2.0%) loan volume. Comparisons to the aggregate data for the evaluation period indicated overall decreased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was below the lending volume of similarly-situated banks.

### **Geographic Distribution**

M&T's overall geographic distribution of loans reflects excellent penetration in the MSA 13780 (Binghamton, NY) assessment area. HMDA lending penetration in LMI census tracts was excellent, while small business lending penetration was good. M&T demonstrated excellent responsiveness to the credit needs of the assessment area by having excellent penetration rates in low- or moderate-income census tracts. M&T penetrated 100.0% of low- and moderate-income census tracts. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	5	0	100%
Moderate	13	0	100%
Middle	31	1	97%
Upper	16	0	100%
<b>2012</b>			
Low	5	0	100%
Moderate	13	0	100%
Middle	31	3	90%
Upper	16	0	100%

### *Home Purchase*

The overall distribution of home purchase loans was excellent based on excellent performance in LMI census tracts. M&T's home purchase lending in low-income census tracts was excellent. In 2013, M&T made 2.5% by number and 1.8% by dollar volume of its home purchase loans in low-income census tracts. M&T's home purchase lending was above the demographic which indicated that 2.3% of owner-occupied housing units were located in low-income census tracts and also above the aggregate's performance of 2.2% by number and 1.5% by dollar volume of its home purchase loans in low-income census tracts. Home purchase lending in 2012 was comparable to 2013's performance.

Home purchase lending in moderate-income census tracts was excellent. In 2013, M&T made 11.8% by number and 8.1% by dollar volume of its home purchase loans in moderate-income census tracts which were above demographics which indicated that 10.1% of owner-occupied housing units are located in moderate-income census tracts. M&T's home purchase performance also exceeded the aggregate which made 9.4% by number and 6.5% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase lending in 2012 was comparable to 2013's performance.

### *Refinance*

The overall distribution of refinance loans excellent based on excellent performance in LMI census tracts. Refinance lending in low-income census tracts was excellent. In 2013, M&T made 3.8% by number and 3.1% by dollar volume of its refinance loans in low-income census tracts. Refinance lending performance was above the demographic which indicate that 2.3% of owner-occupied housing units are located in low-income census tracts. Refinance lending was also above the aggregate which made 1.9% by number and 1.0% by dollar volume of its refinance loans in low-income census tracts. Refinance lending in 2012 was comparable to 2013's lending.

M&T's refinance lending in moderate-income census tracts was excellent. In 2013, M&T made 10.2% by number and 5.3% by dollar volume of its refinance loans in moderate-income census tracts which were similar to the 10.1% of owner-occupied housing units located in moderate-income census tracts. M&T's refinance lending was above the aggregate which made 8.0% by number and 4.1% by dollar volume of its refinance loans in moderate-income census tracts. Refinance lending in 2012 was comparable to 2013.

#### *Home Improvement*

The overall distribution of home improvement loans in LMI census tracts was excellent based on excellent performance in low-and moderate-income census tracts. Home Improvement lending in low-income census tracts was excellent as M&T made 3.6% by number and 2.2% by dollar volume of its home improvement loans in low-income census tracts which exceeded the 2.3% of owner-occupied housing units located in low-income census tracts. M&T's lending performance also exceeded the aggregate which made 1.5% by number and dollar volume of its home improvement loans in low-income census tracts. Home improvement lending in 2012 was comparable to 2013's lending in low-income census tracts.

M&T's home improvement lending in moderate-income census tracts was excellent. The bank's home improvement lending was above the demographics of the assessment area, which indicate that 10.1% of the available owner-occupied housing units are located in moderate-income census tracts compared to the bank's 17.9% by number and 10.8% dollar volume of home improvement loans. Home improvement lending also exceeded the aggregate which made 8.2% by number and 5.6% by dollar volume of its home improvement loans in moderate-income census tracts. Home improvement lending in 2012 was comparable to performance in 2013.

#### *Small Business*

The overall distribution of small business loans in LMI census tracts was good based on excellent performance in low-income tracts and adequate performance in moderate-income census tracts. M&T's small business lending in low-income census tracts was excellent. In 2013, M&T originated 11.2% by number and 10.4% by dollar volume of its small business loans in low-income census tracts, which was above the aggregate's performance of 9.6% by number and 10.0% by dollar volume of its small business loans in low-income census tracts. Small business lending exceeded the demographics that indicated that 7.7% of businesses are located in low-income census tracts. Small business lending in 2012 exceeded performance in 2013.

M&T's small business lending in moderate-income census tracts was adequate. M&T originated 11.2% by number and 10.6% by dollar volume of its small business loans in moderate-income census tracts, which was below the aggregate's 14.7% by number and 12.2% by dollar volume of small business loans in moderate-income census tracts. Small business lending was below the demographics that indicate that 14.0% of businesses are located in moderate-income census.

M&T's 2012 small business lending performance in moderate-income census tracts was comparable to its 2013 performance.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 13780 (Binghamton, NY) assessment area reflects good penetration. Overall, lending to LMI borrowers was good and lending to small businesses was adequate.

#### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was good based on excellent performance to moderate-income borrowers and adequate performance to low-income borrowers. M&T's home purchase lending to low-income borrowers was poor. M&T made 5.9% by number and 2.7% by dollar volume of its home purchase loans to low-income borrowers when 20.5% of families in the MSA assessment area are of low-income. Home purchase performance was below the performance of the aggregate which made 7.6% by number and 4.5% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2013 home purchase performance was comparable to its 2012 performance.

Home purchase lending to moderate-income borrowers was excellent. M&T made 34.0% by number and 26.5% by dollar volume of its home purchase loans to moderate-income borrowers when 18.2% of families in the MSA assessment area are of moderate-income. Home purchase performance was above the aggregate which made 23.3% by number and 18.4% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance was comparable to its 2013 performance.

#### *Refinance*

The overall distribution of refinance loans to LMI borrowers was good based on good performance to moderate-income borrowers and adequate performance to low-income borrowers. Refinance lending to low-income borrowers was adequate as 8.9% by number and 4.9% by dollar volume of refinance loans were to low-income borrowers compared to 20.5% of families in the MSA assessment area which are of low-income. Performance however, was above the aggregate which made 5.2% by number and 2.3% by dollar volume of its refinance loans to low-income borrowers. M&T's 2012 refinance performance was below its 2013 performance.

Refinance lending to moderate-income borrowers was good. M&T made 14.6% by number and 9.5% by dollar volume of its refinance loans to moderate-income borrowers when 18.2% of families in the MSA assessment area are of moderate-income. Refinance performance was above



the aggregate which made 14.4% by number and 7.6% by dollar volume of its refinance loans to moderate-income borrowers. M&T's 2012 refinance was comparable.

### *Home Improvement*

The overall distribution of home improvement loans to LMI borrowers was excellent based on excellent performance to LMI borrowers. M&T's home improvement lending to low-income borrowers was excellent. M&T made 19.6% by number and 12.1% by dollar volume of its home improvement loans to low-income borrowers when 20.5% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 10.8% by number and 3.8% by dollar volume of its home improvement loans to low-income borrowers. Home improvement performance in 2013 was comparable to 2012's performance.

Home improvement lending to moderate-income borrowers was excellent. M&T made 19.6% by number and 10.6% by dollar volume of its home improvement loans to moderate-income borrowers when 18.2% of families in the MSA assessment area are of moderate-income. Home improvement performance was similar to the aggregate which also made 19.9% by number and 10.0% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent.

### *Small Business Lending*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 50.9% by number and 39.8% by dollar volume of its small business loans to these businesses, compared to the 89.6% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 42.6% by number and 38.6% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 62.1% by number and 21.2% by dollar volume of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 92.5% by number and 33.5% by dollar volume of small business loans in amounts of \$100,000 or less. Small business lending performance in 2012 was comparable to the bank's performance in 2013 as the percentage of loans to businesses with GAR of \$1 million or less was below the demographic but exceeded the aggregate. In 2012, 63.2% of small business loans were in amounts of \$100,000 or less compared to the aggregate's 95.5%.

### Community Development Lending

As shown in the table to the right, M&T made an adequate level of community development loans in MSA 13780 (Binghamton, NY) with 10 loan originations totaling \$3.1 million, or less than 1.0% of the bank's New York State community development lending activity. Performance

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	3	\$272
Community Services	6	\$1,762
Economic Development	1	\$1,017
<b>Total</b>	<b>10</b>	<b>\$3,051</b>

within the MSA was directed at community service and economic development initiatives, which represented 91.1% of community development lending activity within the MSA. M&T ranked average of five similarly-situated banks, when comparing annualized community development loans to deposits within MSA 13780 (Binghamton, NY).

Examples of community development initiatives included but were not limited to:

- A \$1 million SBA 504 loan for construction of a microbrewery that will create jobs for LMI individuals in MSA 15380 (Binghamton, NY).
- A \$500,000 line of credit to a 150 bed nursing facility for senior LMI individuals. The facility is located in a moderate-income area. Seventy percent of all revenues for the facility comes from Medicaid.
- A \$250,000 line of credit to a nonprofit corporation that provides social services to the LMI residents of Broome County. Services include child care services, caring homes programs works to prevent homelessness through support, education and financial assistance, family library, social-emotional health care screening, early head start and head start, literacy training and operation of a food pantry.

### INVESTMENT TEST

As shown in the table to the right, M&T made an adequate level of qualified investments in MSA 13780 (Binghamton, NY) rarely in a leadership position with \$1.6 million of qualified investments dedicated to activities inside MSA 13780 (Binghamton, NY). Total qualified investments made in MSA 13780 (Binghamton, NY) accounted for 1.0% of total New York State qualified investments. Of the assessment area investments, \$318,000 or 20.0%, were new investments made in the current evaluation period while \$1.3 million were prior period investments. M&T's level of qualified investments compared less favorably to that of similarly-situated large retail banks operating in the assessment area.

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	9	\$1,300
Community Services	56	\$299
<b>Total</b>	<b>65</b>	<b>\$1,598</b>

M&T made significant use of complex investments to support community development initiatives, with 42.0% of assessment area investments made in LIHTC projects. M&T also exhibited adequate responsiveness to the credit and community development needs of the assessment area, with 38.0% of assessment area investments primarily targeting affordable housing projects through investments in MBS. While MBS are qualified investments that provide some liquidity to the market, they are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments.

The following are examples of qualified investments that met critical needs in the assessment area:

- A \$665,000 investment in a multi-property LIHTC project that benefits LMI individuals.
- A \$473,000 mortgage-backed security investment that supports the provision of affordable housing for LMI individuals.
- Multiple grants totaling \$273,000 to organizations that support affordable housing and community services to LMI individuals throughout the assessment area.

## **SERVICE TEST**

M&T's performance under the service test in MSA 13780 (Binghamton, NY) was excellent based on being a leader in providing community development services. Delivery systems in MSA 13780 (Binghamton, NY) were readily accessible to all portions of the assessment area and changes in branch locations did not adversely affect accessibility, and hours and services are tailored to the convenience and needs of the assessment area.

### **Retail Services**

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated 14 branches in the Binghamton MSA. Two (14.0%) of these branches were located in low-income areas and two (14.0%) were in moderate-income areas, which compares favorably to 5.0% and 14.0% of the MSA's population residing in low- and in moderate-income areas, respectively.

Alternative delivery systems enhanced M&T's performance in the assessment area. M&T had eight off-site ATM locations in the assessment area with two (25.0%) located in moderate-income tracts.

Changes in branch locations in the assessment area did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T closed one branch, which was located in a moderate-income tract.

Services did not vary in a way that inconveniences its assessment area, particularly LMI geographies or LMI individuals. Of the 14 branches in the MSA, eight, or 57.0%, have early morning, late evening or Saturday hours. Of the four branches in LMI census tracts, two, or 50.0%, had extended or Saturday hours.

### Community Development Services

M&T was a leader in providing community development services in the assessment area, as shown in the table to the right. The majority of the seminars produced by M&T related to mortgage education. In addition, management and staff served as directors, advisors or committee members to 14 nonprofit and community based organizations throughout the bank's assessment area.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	147
Financial Literacy	1
Small Business Seminars	5
<b>Total</b>	<b>153</b>

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 10580 (ALBANY-SCHENECTADY-TROY, NY)

A limited evaluation of M&T's performance in MSA 10580 (Albany-Schenectady-Troy, NY) was completed. M&T's assessment area in this MSA consists of Albany, Rensselaer, Saratoga, and Schenectady Counties. According to the 2010 Census, the MSA has 14.0% of the New York State assessment area's population. The City of Albany in the MSA is the capital of New York State.

During the 2012 and 2013 evaluation period M&T had 8.0% of its New York State HMDA and small business lending activity in MSA (Albany-Schenectady-Troy, NY) and maintains 14 branches. Three of the branches are in LMI census tracts. The 14 branches operating in MSA 10580 generated 4.0% of deposits in New York State as of June 30, 2013. M&T ranks 6<sup>th</sup> out of 24 banks in the MSA with 5.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 10580 (ALBANY-SCHENECTADY-TROY, NY)

Examiners conducted a limited scope review of the bank's CRA performance in the Albany, NY assessment area. Examiners determined that the bank's performance in MSA (Albany-Schenectady-Troy, NY) was consistent with the bank's overall performance under the lending, investment, and service tests in the state. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 10580	Consistent	Consistent	Consistent

The overall lending test rating for New York State was high satisfactory. M&T's lending test performance in the MSA 10580 (Albany-Schenectady-Troy, NY) was consistent with this performance based on good lending activity and geographic distribution performance and adequate borrower distribution performance. Community development lending performance was excellent with \$190 million in community development lending or 16.3% of all M&T's community development lending in New York State. Performance under both the investment test and the service test was consistent with the outstanding rating for New York State. M&T's investment test performance was excellent as 9.0% of all qualified investments in New York were originated in the MSA 10580 (Albany-Schenectady-Troy, NY). Performance under the service test was also excellent in both retail and community development services.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 39100 (POUGHKEEPSIE-NEWBURGH-MIDDLETOWN, NY)

A limited evaluation of M&T's performance in MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) was completed. M&T's assessment area in this MSA consists of Dutchess and Orange Counties. According to the 2010 Census, the MSA has 11.0% of the New York State assessment area's population. Principal cities within the MSA consist of Poughkeepsie, NY in Dutchess County and the cities of Newburgh and Middletown, NY in Orange County.

During the 2012 and 2013 evaluation period M&T had 5.0% of its New York State HMDA and small business lending activity in MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) and maintains 19 branches. Four of the branches are in LMI census tracts. The 19 branches operating in MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) generated 4.0% of deposits in New York State as of June 30, 2013. M&T ranks 4<sup>th</sup> out of 29 banks in the MSA with 9.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 39100 (POUGHKEEPSIE-NEWBURGH-MIDDLETOWN, NY)

M&T's performance in MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) was not consistent with its overall outstanding performance in New York State, which was based on the full-scope assessment area performance; however, it does not change the rating for New York State.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 39100	Consistent	Below	Below

The overall lending test rating for New York State was high satisfactory. M&T's lending test performance in MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) was consistent with this performance as lending activity was good while geographic and borrower distribution performance was adequate. Community development lending performance was good with \$54.4 million in community development lending or 4.7% of all M&T's community development lending in New York State. Performance under both the investment test and the service test was not consistent with the outstanding rating for New York State. M&T's investment test performance was good as 1.0% of all qualified investments in New York were originated in MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY). Performance under the service test was not consistent with the bank's excellent performance as performance was good in both retail services and community development services.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 46540 (UTICA-ROME, NY)

A limited evaluation of M&T's performance in MSA 46540 (Utica-Rome NY) was completed. M&T's assessment area in this MSA consists of Herkimer and Oneida Counties. According to the 2010 Census, the MSA has 5.0% of the New York State assessment area's population. Principal cities within the MSA consist of Utica, NY in Herkimer County and Rome, NY in Oneida, County.

During the 2012 and 2013 evaluation period M&T had 5.0% of its New York State HMDA and small business lending activity in MSA 46540 (Utica-Rome NY) and maintains 12 branches. None of the branches are in low- to moderate-income census tracts. The 12 branches operating in MSA 46540 (Utica-Rome NY) generated 2.0% of deposits in New York State as of June 30, 2013. M&T ranks 2<sup>nd</sup> out of 14 banks in the MSA with 17.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 46540 (UTICA-ROME, NY)

M&T's performance in MSA 46540 (Utica-Rome NY) was not consistent with its overall outstanding performance in New York State, which was based on the full-scope assessment area performance; however, it does not change the rating for New York State.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 46540	Consistent	Below	Below

The overall lending test rating for New York State was high satisfactory. M&T's lending test performance in MSA 46540 (Utica-Rome NY) was consistent with this performance as lending activity was good while geographic and borrower distribution performance was adequate. Community development lending performance was good with \$19.2 million in community development lending or 1.6% of all M&T's community development lending in New York State. Performance under both the investment test and the service test was not consistent with the outstanding rating for New York State. M&T's investment test performance was adequate as less than 1.0% of all qualified investments in New York were originated in MSA 46540 (Utica-Rome NY). Performance under the service test was not consistent with the bank's excellent performance as performance was adequate in both retail services and community development services.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 28740 (KINGSTON, NY)

A limited evaluation of M&T's performance in MSA 28740 (Kingston, NY) was completed. M&T's assessment area in this MSA consists of Ulster County. According to the 2010 Census, the MSA has 3.0% of the New York State assessment area's population. Principal cities within the MSA consist of Kingston, NY.

During the 2012 and 2013 evaluation period M&T had 1.0% of its New York State HMDA and small business lending activity in MSA 28740 (Kingston, NY) and maintains six branches. Two of the branches are in LMI census tracts. The six branches operating in MSA 28740 (Kingston, NY) generated 1.0% of deposits in New York State as of June 30, 2013. M&T ranks 3<sup>rd</sup> out of 20 banks in the MSA with 10.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 28740 (KINGSTON, NY)

M&T's performance in MSA 28740 (Kingston, NY) was not consistent with its overall outstanding performance in New York State, which was based on the full-scope assessment area performance; however, it does not change the rating for New York State.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 28740	Consistent	Below	Consistent

The overall lending test rating for New York State was high satisfactory. M&T's lending test performance in MSA 28740 (Kingston, NY) was consistent with this performance as lending activity and geographic distribution were good while borrower distribution performance was adequate. Community development lending performance was good with \$6.5 million in community development lending or 0.5% of all M&T's community development lending in New York State. Performance under the investment test was not consistent with the outstanding rating for New York State. M&T's investment test performance was adequate with \$54,000 in qualified investments in New York originated in MSA 28740 (Kingston, NY). Performance under the service test was consistent with the bank's excellent performance as performance was excellent in retail services and performance in community development services was good.



## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 27060 (ITHACA, NY)

A limited evaluation of M&T's performance in MSA 27060 (Ithaca, NY) was completed. M&T's assessment area in this MSA consists of Tompkins County. According to the 2010 Census, the MSA has 2.0% of the New York State assessment area's population. Tompkins County is home to the City of Ithaca, NY. The city is noted for its two institutions of higher learning, Cornell University and Ithaca College.

During the 2012 and 2013 evaluation period M&T had 1.0% of its New York State HMDA and small business lending activity in MSA 27060 (Ithaca, NY) and maintains three branches. One of the branches is located in an LMI census tract. The branches generated 1.0% of deposits of M&T's deposits in New York State as of June 30, 2013. M&T ranks 3<sup>rd</sup> out of 11 banks in MSA 27060 (Ithaca, NY) with 9.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 27060 (ITHACA, NY)

M&T's performance in MSA 27060 (Ithaca, NY) was consistent with its overall outstanding performance in New York State, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 27060	Consistent	Consistent	Consistent

The overall lending test rating for New York State was high satisfactory. M&T's lending test performance in MSA 27060 (Ithaca, NY) was consistent with this performance as both geographic and borrower distribution performance was good while lending activity was adequate. Community development lending performance was good with \$20.9 million in community development lending or 1.8% of all M&T's community development lending in New York State. Performance under both the investment test and the service test was consistent with the outstanding rating for New York State. M&T's investment test performance was excellent with \$17.8 million in qualified investments with 7.0% of all qualified investments in New York were originated in Tompkins County. Performance under the service test was consistent with the bank's excellent performance as performance was excellent for both retail services and community development services.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 21300 (ELMIRA, NY)

A limited evaluation of M&T's performance in MSA 21300 (Elmira, NY) was completed. The assessment area includes parts of Chemung County including the City of Elmira, NY. According to the 2010 Census, the assessment area has 1.0% of the New York State assessment area's population.

During the 2012 and 2013 evaluation period the assessment area had less than 1.0% of its New York State HMDA and small business lending activity in this assessment area. M&T maintains one branch in the assessment area which is located in an LMI census tract. The branch has less than 1.0% of M&T's deposits in New York State as of June 30, 2013. M&T ranks 5<sup>th</sup> out of 7 banks in the assessment area with 2.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 21300 (ELMIRA, NY)

Facts and data reviewed, including performance and demographic information, can be found in the tables accompanying this report. Conclusions regarding performance, which did not impact the overall rating, are as follows:

M&T's performance in MSA 21300 (Elmira, NY) was not consistent with its overall outstanding performance in New York State, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 21300	Consistent	Below	Consistent

The overall lending test rating for New York State was high satisfactory. M&T's lending test performance in the assessment area was consistent with this performance although lending activity was limited as the bank made just 27 HMDA loans and 13 small business loans in MSA 21300 (Elmira, NY). Both geographic distribution and borrower distribution were excellent. Community development lending performance was adequate as the assessment area also benefited from \$27.7 million in statewide loans. Investment test performance was not consistent with the excellent performance in the state as MSA 21300 (Elmira, NY) had \$12,000 in grants and donations. Service test performance was consistent with the outstanding rating for New York State as the bank had one branch in MSA 21300 (Elmira, NY) located in an LMI area which helps ensure that the LMI residents of the area have access to banking services.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN NY NONMETROPOLITAN AREA GROUP A (ALLEGANY, CATTARAGUS, CHAUTAUQUA, GENESEE, STEUBEN, AND WYOMING COUNTIES)

A limited evaluation of M&T's performance in NY Nonmetropolitan area Group A (Allegany, Cattaraugus, Chautauqua, Genesee, Steuben, and Wyoming Counties) assessment area that contains all contiguous counties was completed. According to the 2010 Census, the assessment area has 8.0% of the New York State assessment area's population.

During the 2012 and 2013 evaluation period the assessment area had 5.0% of its New York State HMDA and small business lending activity in this assessment area. M&T maintains 23 branches in the counties two of which are in LMI census tracts. The branches have 2.0% of M&T's deposits in New York State as of June 30, 2013. M&T ranks 3<sup>rd</sup> out of 21 banks in the assessment area with 12.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NY NONMETROPOLITAN AREA GROUP A (ALLEGANY, CATTARAGUS, CHAUTAUQUA, GENESEE, STEUBEN, AND WYOMING COUNTIES)

Facts and data reviewed, including performance and demographic information, can be found in the tables accompanying this report. Conclusions regarding performance, which did not impact the overall rating, are as follows:

M&T's performance in NY Nonmetropolitan area Group A (Allegany, Cattaraugus, Chautauqua, Genesee, Steuben, and Wyoming Counties) was not consistent with its overall outstanding performance in New York State, which was based on the full-scope assessment area performance; however, it does not change the rating for New York State.

Assessment Area	Lending Test	Investment Test	Service Test
NY Nonmetropolitan area Group A	Consistent	Consistent	Below

The overall lending test rating for New York State was high satisfactory. M&T's lending test performance in the assessment area was consistent with this performance as lending activity, geographic distribution and borrower distribution performance was good. Community development lending performance was good with \$5.4 million in community development loans and the assessment area also benefited from \$27.7 million in statewide loans. Investment test performance was consistent with the excellent performance in the state with \$9.8 million in

qualified investments. Service test performance was not consistent with the outstanding rating for New York State as both retail services and Community development services were good.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN NY NONMETROPOLITAN AREA GROUP B (CAYUGA, CHENANGO, CORTLAND, AND SENECA COUNTIES)

A limited evaluation of M&T’s performance in NY Nonmetropolitan area Group B (Cayuga, Chenango, Cortland, and Seneca Counties) assessment area that contains all contiguous counties was completed. According to the 2010 Census, the assessment area has 4.0% of the New York State assessment area’s population.

During the 2012 and 2013 evaluation period the assessment area had 2.0% of its New York State HMDA and small business lending activity in this assessment area. M&T maintains five branches in the counties, none of which are in LMI census tracts. The branches have less than 1.0% of M&T’s deposits in New York State as of June 30, 2013. M&T ranks 9<sup>th</sup> out of 17 banks in the assessment area with 4.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NY NONMETROPOLITAN AREA GROUP B (CAYUGA, CHENANGO, CORTLAND, AND SENECA COUNTIES)

M&T’s performance in NY Nonmetropolitan area Group B (Cayuga, Chenango, Cortland, and Seneca Counties) was not consistent with its overall outstanding performance in New York State, which was based on the full-scope assessment area performance; however, it does not change the rating for New York State.

Assessment Area	Lending Test	Investment Test	Service Test
NY Nonmetropolitan area Group B	Consistent	Below	Below

The overall lending test rating for New York State was high satisfactory. M&T’s lending test performance in the assessment area was consistent with this performance as lending activity, geographic distribution and borrower distribution performance was good. Opportunities for HMDA lending in LMI tracts was limited as the four counties had only one low-income census tract and one moderate-income census tract. Community development lending performance was good with \$5.9 million in community development loans and the assessment area also benefited from \$27.7 million in statewide loans. Investment test performance was not consistent with the excellent performance in the state as performance was good with \$2.4 million in qualified investments. Service test performance was not consistent with the outstanding rating for New York State as both retail services and community development services were adequate.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN NY NONMETROPOLITAN AREA GROUP C (SULLIVAN COUNTY)

A limited evaluation of M&T's performance in NY Nonmetropolitan area Group C (Sullivan County) was completed. According to the 2010 Census, the assessment area has 1.0% of the New York State assessment area's population.

During the 2012 and 2013 evaluation period the assessment area had 1.0% of its New York State HMDA and small business lending activity in this assessment area. M&T maintains three branches in the county, one of which is in an LMI census tract. The branches have less than 1.0% of M&T's deposits in New York State as of June 30, 2013. M&T ranks 7<sup>th</sup> out of 11 banks in the assessment area with 5.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NY NONMETROPOLITAN AREA GROUP C (SULLIVAN COUNTY)

M&T's performance in Nonmetropolitan area Group C (Sullivan County) was not consistent with its overall outstanding performance in New York State, which was based on the full-scope assessment area performance; however, it does not change the rating for New York State.

Assessment Area	Lending Test	Investment Test	Service Test
NY Nonmetropolitan area Group C	Consistent	Below	Below

The overall lending test rating for New York State was high satisfactory. M&T's lending test performance in the assessment area was consistent with this performance as lending activity, geographic distribution and borrower distribution performance was good. Community development lending performance was adequate as the assessment area benefited from \$27.7 million in statewide loans. Investment test performance was below the excellent performance in the state with \$1.4 million in qualified investments. Service test performance was not consistent with the outstanding rating for New York State as retail services were excellent while community development services were adequate.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN NY NONMETROPOLITAN AREA GROUP D (JEFFERSON COUNTY)

A limited evaluation of M&T's performance in NY Nonmetropolitan area Group D (Jefferson County) was completed. M&T's assessment area in this assessment area consists of Jefferson County. According to the 2010 Census, the MSA has 2.0% of the New York State assessment area's population. Principal cities within Jefferson County consist of Watertown, NY. Jefferson County is also home to the U.S. Army's military base at Fort Drum, NY. In 2014, Jefferson County was designated as MSA 48060 (Watertown-Fort Drum, NY).

During the 2012 and 2013 evaluation period, Jefferson County had less than 1.0% of its New York State HMDA and small business lending activity in this assessment area. M&T maintains 1 branch in the county which is not in an LMI census tract. The branch has less than 1.0% of M&T's deposits in New York State as of June 30, 2013. M&T ranks 9<sup>th</sup> out of 11 banks in the MSA with 2.0% of all deposits in Jefferson County.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NY NONMETROPOLITAN AREA GROUP D (JEFFERSON COUNTY)

M&T's performance in NY Nonmetropolitan area Group D (Jefferson County) was not consistent with its overall outstanding performance in New York State, which was based on the full-scope assessment area performance; however, it does not change the rating for New York State.

Assessment Area	Lending Test	Investment Test	Service Test
NY Nonmetropolitan area Group D	Consistent	Consistent	Below

The overall lending test rating for New York State was high satisfactory. M&T's lending test performance in NY Nonmetropolitan area Group D (Jefferson County) was consistent with this performance as lending activity and geographic distribution was good while borrower distribution performance was adequate. Community development lending performance was good with \$6 million in community development lending or 0.5% of all M&T's community development lending in New York State. Investment test performance was consistent with the excellent performance in the state with \$33 million in qualified investments. Service test was not consistent with the outstanding rating for New York State as both retail and community development services were adequate.

As previously mentioned, limited scope reviews were conducted for the below listed assessment areas in New York State. The data reviewed, including performance and demographic information, can be found in the New York State tables in Appendices E, F, G, and H. Conclusions regarding the bank's performance on the lending, investments, and service tests were compared with the overall state rating, which was based on the full-scope assessment area performance. Please see below for a summary of the ratings.

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 10580	Consistent	Consistent	Consistent
MSA 39100	Consistent	Below	Below
MSA 46540	Consistent	Below	Below
MSA 28740	Consistent	Below	Consistent
MSA 27060	Consistent	Consistent	Consistent
MSA 21300	Consistent	Below	Consistent
NY Nonmetropolitan area Group A	Consistent	Consistent	Below
NY Nonmetropolitan area Group B	Consistent	Below	Below
NY Nonmetropolitan area Group C	Consistent	Below	Below
NY Nonmetropolitan area Group D	Consistent	Consistent	Below

M&T's performance in the limited-scope assessment areas did not change the overall state rating.



## STATE OF MARYLAND

### ***CRA RATING FOR MARYLAND<sup>7</sup>: OUTSTANDING***

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

***The Investment test is rated: Outstanding***

***The Service test is rated: Outstanding***

The major factors supporting the rating include:

- A leader in making community development loans;
- An excellent level of qualified investments;
- A good geographic distribution of loans in the bank's assessment areas;
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- Good responsiveness to assessment area credit needs;
- Readily accessible delivery systems to geographies and individuals of different income levels;
- A record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals;
- The bank's reasonableness of business hours and services do not vary in a way that inconveniences any portions of the assessment areas; and
- A leader in providing community development services.

### **SCOPE OF EXAMINATION**

Examiners conducted a full-scope review of MSA 12580 (Baltimore-Towson, MD). Activity within the State of Maryland is heavily concentrated in this MSA. MSA 12580 (Baltimore-Towson, MD) has 94.0% of deposits and 84.0% of the HMDA and small business loans originated in the Maryland assessment areas during the review period. Since MSA 12580 (Baltimore-Towson, MD) is the only full scope assessment area for the State of Maryland, ratings are primarily based on performance within that MSA. Limited reviews were conducted of the remaining Maryland assessment areas:

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<sup>7</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

- MSA 25180 (Hagerstown-Martinsburg, MD-WV)
- MSA 41540 (Salisbury, MD)
- MD Nonmetropolitan area Group A (Caroline, Dorchester, and Talbot Counties)
- MD Nonmetropolitan area Group B (St. Mary's County)
- MD Nonmetropolitan area Group C (Worcester County)
- MD Nonmetropolitan area Group D (Garrett County)

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MARYLAND**

The bank's activities in the State of Maryland make up a relatively significant proportion of M&T's operations and were weighted accordingly when deriving overall ratings. The bank has 126 branches in the Maryland assessment areas, representing 18.0% of all branches. Maryland branches also generated 23.0% of deposits as of June 30, 2013, and 12.0% of HMDA and small business loans. See Exhibit V, Summary of Key Assessment Area Data on page 141, for additional assessment area data for the State of Maryland.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MARYLAND**

### **LENDING TEST**

M&T's lending test performance is rated high satisfactory based on good performance in MSA 12580 (Baltimore-Towson, MD). Some data used to evaluate the bank's performance in the Maryland assessment areas appear in Appendices E, G, and H.

#### **Lending Activity**

M&T's lending activity showed adequate responsiveness to retail credit needs when measured in terms of the number and dollar amount of HMDA-related and small business loans originated and purchased in the MSA 12580 (Baltimore-Towson, MD) assessment area.

#### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration throughout the State of Maryland. This conclusion is based on good performance in MSA 12580 (Baltimore-Towson, MD). There were no significant lending gaps in the assessment area. For details, refer to the Geographic Distribution section of each full-scope assessment area.

#### **Borrower Distribution**

The overall distribution of loans among borrowers of different income levels and businesses of different sizes in the State of Maryland was adequate, based on adequate performance in MSA 12580 (Baltimore-Towson, MD).

## **Community Development Lending**

M&T was a leader in community development lending throughout the State of Maryland. During the evaluation period, M&T originated 34 community development loans totaling \$236 million. This is an excellent level of community development lending.

Community development lending initiatives targeted affordable housing and revitalization and stabilization initiatives (43.0% and 30.0% of total statewide initiatives, respectively). The remainder of community development lending targeted community service initiatives and economic development initiatives, which represented 22.0% and 5.0% of total activity, respectively.

## **INVESTMENT TEST**

M&T's performance under the investment test was excellent in the State of Maryland. In the state, M&T had an overall excellent level of qualified investments that exhibited good responsiveness to credit and community development needs. This conclusion was based primarily on the bank's performance in MSA 12580 (Baltimore-Towson, MD).

M&T made \$103 million in total qualified investments in the State of Maryland, which represents 18.0% of the bank's total qualified investments. Investment activity was primarily in MSA 12580 with \$85 million of investments. Total investments in the State of Maryland also included \$9 million of investments made to the broader statewide area that includes the assessment areas. In addition, \$39 million or 38.0% of M&T's Maryland investments were new investments made in the current evaluation period.

M&T made significant use of innovative and/or complex investments to support community development initiatives in the State of Maryland. Approximately \$34 million of the qualified investments were invested in LIHTCs, which have intricate accounting requirements, and \$26 million were investments in the HUD's Neighborhood Stabilization Program, which is an innovative initiative to address the housing crisis.

## **SERVICE TEST**

M&T's performance under the service test in the Maryland assessment areas was excellent. This conclusion is based primarily on excellent performance in MSA 12580 (Baltimore-Towson, MD).

Exhibit V: Summary of Key Assessment Area Data: State of Maryland Assessment Areas

	MSA 12580	MSA 25180	MSA 41540	Non-MSA Group A	Non-MSA Group D	Non-MSA Group C	Non-MSA Group B	Maryland Totals
Total Population <sup>4</sup>	2,710,489	147,430	98,733	103,466	30,097	51,454	105,151	3,143,354
Population % of AA population	86%	5%	3%	3%	1%	2%	3%	100%
Families	665,999	37,817	23,411	28,593	8,502	14,750	26,621	777,100
Families % of AA families	86%	5%	3%	4%	1%	2%	3%	100%
Total Census Tracts <sup>4</sup>	683	32	19	30	7	17	18	776
Tracts % AA tracts	88%	4%	2%	4%	1%	2%	2%	100%
LMI tracts	247	9	5	7	4	4	2	271
LMI tracts % all AA LMI tracts	91%	3%	2%	3%	1%	1%	1%	100%
Total Owner-Occupied Units <sup>4</sup>	692,428	36,741	23,669	30,344	9,513	17,310	26,418	806,079
Units % of AA units	86%	5%	3%	4%	1%	2%	3%	100%
Business Establishments <sup>5</sup>	130,430	6,954	4,755	5,975	1,901	3,815	3,527	151,382
Bus. est. % AA bus. est.	86%	5%	3%	4%	1%	3%	2%	100%
Number of Branches <sup>1</sup>	103	10	4	3	3	2	1	126
Branches % all branches	82%	8%	3%	2%	2%	2%	1%	100%
Branches in LMI tracts	25	5	0	2	1	2	0	35
LMI branches % AA LMI branches	71%	14%	0%	6%	3%	6%	0%	100%
Branch Deposits (\$'000,000s) <sup>2</sup>	14,293	392	173	114	89	77	37	15,175
Deposits % AA deposits	94%	3%	1%	0.8%	0.6%	0.5%	0.2%	100%
Deposit Market Share (%) / Rank in Mkt	22/2	19/3	11/5	6/8	16/3	6/6	3/8	15/2
Home Purchase Originations <sup>3</sup>	1,091	84	17	58	22	28	8	1,250
HP originations % AA orig.	87%	7%	1%	5%	2%	2%	1%	100%
Refinance Originations <sup>3</sup>	2,273	223	56	79	43	62	39	2,696
Refi orig. % AA orig.	84%	8%	2%	3%	2%	2%	1%	100%
Home Improvement Originations <sup>3</sup>	600	51	28	15	23	7	8	717
Home Improvement orig. % AA orig.	84%	7%	4%	2%	3%	1%	1%	100%
Small Business Originations <sup>3</sup>	1,641	185	74	23	46	30	7	1,983
SB orig. % AA orig.	83%	9%	4%	1%	2%	2%	0%	100%
Combined Loan Totals	5,605	543	175	175	134	127	62	6,646
% of AA Orig.	84%	8%	3%	3%	2%	2%	1%	100%

(1) Branch numbers are as of 12/31/2013. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/13. (3) Originations are loans reported under HMDA or CRA small business reporting for 2012 and 2013. (4) Demographic information was obtained from the 2010 Census. (5) Business establishments information was reported by D&B for 2013.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 12580 (BALTIMORE-TOWSON, MD)

As of December 31, 2013, M&T operated 103 branches in the MSA, representing 82.0% of its branches in Maryland. Based on deposits reported to the FDIC as of June 30, 2013, these branches contained approximately \$14.3 billion in deposits, or 94.0% of the bank's total branch deposits in Maryland. As of June 30, 2013, M&T ranked 2<sup>nd</sup> in MSA 12580 (Baltimore-Towson, MD) for deposit market share with 22.0% of the retail deposit market. Other top depository institutions include Bank of America, N.A., the leader in deposit market share in the MSA; PNC National Association; Wells Fargo Bank National Association; and Branch Banking and Trust Co.

#### Community Contacts

One community contact was conducted with officials from the City of Baltimore to understand the redevelopment plan for a part of the City of Baltimore and to ascertain the credit needs of that area. The contact indicated that redevelopment of this area would further economic development by bringing a wide range of jobs to the area. Several major corporations have already opened offices in the area. The availability of light rail transportation also helps access to the area. The contacts also indicated that development of the area would also improve access for the community to the waterfront area.

A second community contact was conducted with a nonprofit corporation organized to fight housing discrimination, provide support for integrated communities, and provide community education and advocacy for persons with disabilities on housing issues. The contact indicated a need for better understanding of the foreclosure process as they often required to act as an intermediary in the process.

#### PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

#### Demographic Characteristics

MSA 12580 assessment area includes Anne Arundel, Baltimore, Carroll, Harford, Howard and Queen Anne's counties and the City of Baltimore. The assessment area consists of 683 census

tracts, of which 100, or 14.6%, are low-income, while 147, or 21.5%, are moderate-income income. The LMI geographies are primarily concentrated in the City of Baltimore.

In 2012, the MSA ranked 14<sup>th</sup> in population density using 2010 Census population statistics. MSA 12580 (Baltimore-Towson, MD) is the 20th largest metro area in the US. The overall population in the assessment area was 2.7 million in 2010 compared to 2.5 million in 2000. For the same period, population statewide grew by approximately 9.0%. Baltimore County, the largest jurisdiction in MSA 12580 (Baltimore-Towson, MD), increased its population by 6.7% from 2000 to 2010.

The City of Baltimore has experienced significantly population decline since 1950 when it peaked at 950,000. For the past six decades the city lost population, falling to about 621,000 in 2012. However, there was a slight increase in the population between 2011 and 2012, indicating that efforts to improve the city and retain residents are starting to take hold. However, the decades of population loss and disinvestment has taken a significant toll on the city.

Additional performance context data for this assessment area is provided in the MSA 12580 (Baltimore-Towson, MD) Assessment Area Demographics table on the next page.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 12580</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	100	14.6	61,628	9.3	15,952	25.9	142,628	21.4
Moderate-income	147	21.5	126,801	19.0	12,791	10.1	115,351	17.3
Middle-income	227	33.2	243,360	36.5	9,954	4.1	139,567	21.0
Upper-income	197	28.8	234,210	35.2	4,899	2.1	268,453	40.3
Unknown-income	12	1.8	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>683</b>	<b>100.0</b>	<b>665,999</b>	<b>100.0</b>	<b>43,596</b>	<b>6.5</b>	<b>665,999</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	139,592	39,063	5.6	28.0	66,993	48.0	33,536	24.0
Moderate-income	244,207	115,002	16.6	47.1	101,927	41.7	27,278	11.2
Middle-income	395,990	269,937	39.0	68.2	99,204	25.1	26,849	6.8
Upper-income	343,144	268,383	38.8	78.2	57,665	16.8	17,096	5.0
Unknown-income	59	43	0.0	72.9	8	13.6	8	13.6
<b>Total Assessment Area</b>	<b>1,122,992</b>	<b>692,428</b>	<b>100.0</b>	<b>61.7</b>	<b>325,797</b>	<b>29.0</b>	<b>104,767</b>	<b>9.3</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	9,556	7.3	8,376	7.2	635	6.9	545	10.9
Moderate-income	18,853	14.5	16,615	14.3	1,319	14.3	919	18.3
Middle-income	49,037	37.6	43,452	37.4	3,687	40.0	1,898	37.9
Upper-income	52,736	40.4	47,592	41.0	3,506	38.0	1,638	32.7
Unknown-income	248	0.2	167	0.1	69	0.7	12	0.2
<b>Total Assessment Area</b>	<b>130,430</b>	<b>100.0</b>	<b>116,202</b>	<b>100.0</b>	<b>9,216</b>	<b>100.0</b>	<b>5,012</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.1</b>		<b>7.1</b>		<b>3.8</b>

Based on 2010 ACS Information.

### Income Characteristics

The FFIEC-adjusted median family income for MSA 12580 (Baltimore-Towson, MD) shows a median family income of \$85,600 for both 2012 and 2013. The 2010 Census shows that within this market, 21.0% of the families are considered low-income, 17.0% are moderate-income, and

7.0% of the families subsist below the poverty level. Within the City of Baltimore 19.0% of families are considered to be living below the poverty level.

Housing Characteristics

Like many metropolitan areas in the US, the housing market in MSA 12580 (Baltimore-Towson, MD) weakened during the recession. Over the past several years, the market has remained soft, with slower sales and nominal residential construction. Home prices have been on the rise in MSA 12580 (Baltimore-Towson, MD) since 2010. According to NAR, home prices in Baltimore increased from \$206,000 in 2012 to \$251,900 in 2013.

The 2010 Census data indicates that there were 1,122,992 housing units located in the assessment area, of which 62.0% were owner-occupied, 29.0% were rental units, and 9.0% were vacant. The median age of the housing stock across the assessment area was 40 years. In the City of Baltimore, over 50.0% of the units were rentals and 18.0% of the housing units were vacant in 2013. The level of economic distress in the city indicates reduced opportunities for home lending.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 130,430 businesses in 2013, of which 89.0% were small businesses with GAR of \$1 million or less. The largest employment concentrations are in the service sectors (professional and business services, administrative and waste services, and accommodation and food services) along with health care and social services, retail, and state and local government. Ft. George G. Meade is the largest employer in the region with almost 50,000 employees, followed by Johns Hopkins University and the Johns Hopkins Hospital and Health System, with more than 40,000 employees combined. Other major employers include Aberdeen Proving Ground, the US Social Security Administration, the University System of Maryland and the University of Maryland Medical System.

As noted in the table to the right, the unemployment rate declined slightly from 2012 to 2013. However, the unemployment rate remains higher in the City of Baltimore than the unemployment rate for the State of Maryland and MSA 12580 (Baltimore-Towson, MD). The MFI in MSA 12580 (Baltimore-Towson, MD) is above the MFI for the State of Maryland. The MFI increased from \$82,200 in 2010 to \$85,600 in 2012 and 2013, whereas the 2013 MFI for the State of Maryland was \$78,800.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 12580	7.2%	6.8%
City of Baltimore	10.2%	9.6%
State of Maryland	7.0%	6.6%

Poverty is a significant concern in the City of Baltimore, where approximately 80.0% of the census tracts in 2010 were considered low- or moderate-income. The region is challenged by



neighborhoods in varying levels of financial distress, particularly within the City of Baltimore. According to Census data, one of four residents in the City of Baltimore lives below the federal poverty level. A substantial number of residents in the assessment area are also relying on federal assistance, including food stamps.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 12580 (BALTIMORE-TOWSON, MD)**

### **LENDING TEST**

M&T's performance under the lending test in MSA 12580 (Baltimore-Towson, MD) was good. This conclusion is based on good lending activity performance, good geographic distribution performance, and adequate borrower distribution. M&T was a leader in community development lending in MSA 12580 (Baltimore-Towson, MD). Greater weight was given to the analysis of small business and refinance lending performance followed by home purchase and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the evaluation of community development lending and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in MSA 12580 (Baltimore-Towson, MD) reflect good responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volumes in the current evaluation period in comparison to the prior evaluation, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was above the aggregate's lending activity.

M&T's market share of deposits in the assessment area and its market share of lending were stable in comparison to the last evaluation. In 2013, M&T had a deposit market share of 22.0% increasing slightly from the 20.0% reported at the last evaluation while lending market shares of 1.0% in home purchase lending, 1.0% in refinance lending, 7.0% in home improvement lending, and 2.0% in small business lending were similar to the market shares reported at the last evaluation.

HMDA and small business volumes in 2013 increased by 18.0% compared to the last evaluation. This increase was driven by increases in home purchase (65.0%), refinance (28.0%), home improvement (6.0%) loan volumes, partially offset by decreased small business (-6.0%) loan volume. Comparisons to the aggregate data for the evaluation period indicated overall increased lending volumes. Peer comparisons of the number of loans originated per billion dollars of

deposits indicated that M&T performance was below the lending volume of similarly-situated banks.

### Geographic Distribution

M&T's overall geographic distribution of loans reflects good penetration in the MSA 12580 assessment area. HMDA and small business lending penetration in LMI census tracts was good.

M&T's responsiveness to meeting the needs of its community is also demonstrated through analysis of conspicuous gaps in lending in low- or moderate-income census tracts. M&T demonstrated good responsiveness to the credit needs of the assessment area by having excellent penetration rates in tracts of low- or moderate-income. During the evaluation period, M&T originated loans in a majority of the census tracts within the assessment area, while low-income tracts had a greater percentage of tracts without loans. According to the 2010 U.S. Census data, approximately 9.3% of families reside in low-income tracts and only 28.0% of the housing units in low-income tracts are owner-occupied. Additionally, 25.9% of families residing in the low-income tracts have incomes below the poverty level. Opportunities to originate mortgage loans are therefore limited in low-income census tracts. The table below details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	100	29	71%
Moderate	147	18	88%
Middle	337	15	96%
Upper	147	9	94%
<b>2012</b>			
Low	100	48	52%
Moderate	147	23	84%
Low	337	16	95%
Moderate	147	5	97%

### Home Purchase

M&T's overall level of home purchase lending in LMI census tracts was excellent based on excellent performance in moderate-income tracts and good performance in low-income tracts. M&T's home purchase lending in low-income census tracts was good. In 2013, M&T made 4.3% by number and 2.3% by dollar volume of its home purchase loans in low-income census tracts. M&T's home purchase lending was below the demographic which indicated that 5.6% of owner-occupied housing units were located in low-income census tracts but exceeded the aggregate's performance of 3.4% by number and 1.8% by dollar volume of its home purchase loans in low-income census tracts. Home purchase lending in 2012 was comparable to 2013's

performance and this performance was below the demographic but was greater than the aggregate.

Home purchase lending in moderate-income census tracts was excellent. In 2013, M&T made 19.2% by number and 11.2% by dollar volume of its home purchase loans in moderate-income census tracts which exceeded the demographic of 16.6% of owner-occupied housing units located in moderate-income census tracts. M&T's home purchase performance also exceeded the aggregate which made 13.5% by number and 7.8% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase lending in 2013 exceeded 2012's performance as 2012's performance was below the demographic but above the aggregate.

### *Refinance*

M&T's overall level of refinance lending was good based on good performance in LMI census tracts. Refinance lending in low-income census tracts was good. In 2013, M&T made 4.4% by number and 2.4% by dollar volume of its refinance loans in low-income census tracts. Refinance lending performance was below the demographic which indicated that 5.6% of owner-occupied housing units are located in low-income census tracts. Refinance lending; however, was above the aggregate by number which made 2.8% by number and 5.5% by dollar volume of its refinance loans in low-income census tracts. Refinance lending in 2013 exceeded 2012's performance was below the demographic but above the aggregate.

M&T's refinance lending in moderate-income census tracts was good. In 2013, M&T made 16.6% by number and 11.4% by dollar volume of its refinance loans in moderate-income census tracts which was similar to the 16.6% of owner-occupied housing units located in moderate-income census tracts. M&T's refinance lending was above the aggregate which made 11.5% by number and 12.5% by dollar volume of its refinance loans in moderate-income census tracts. Refinance lending in 2012 was comparable to 2013.

### *Home Improvement*

M&T's overall level of home improvement lending was excellent based on excellent performance in LMI census tracts. Home improvement lending in low-income census tracts was excellent as M&T made 13.8% by number and 25.5% by dollar volume of its home improvement loans in low-income census tracts which was significantly above the 5.6% of owner-occupied housing units located in low-income census tracts. M&T's home improvement performance was also above the aggregate which made 5.9% by number and 2.4% by dollar volume of its home improvement loans in low-income census tracts. Home improvement lending in 2012 was comparable to 2013's lending in low-income census tracts.

M&T's home improvement lending in moderate-income census tracts was excellent as M&T made 20.0% by number and 16.0% by dollar volume of its home improvement loans in moderate-income census tracts. The bank's home improvement lending was above the

demographics of the assessment area, which indicate that 16.6% of the available owner-occupied housing units are located in moderate-income census tracts. Home improvement lending also exceeded the aggregate which made 14.9% by number and 6.7% by dollar volume of its home improvement loans in moderate-income census tracts. Home improvement lending in 2012 was comparable to performance in 2013.

#### *Small Business*

M&T's overall level of small business lending in LMI census tracts was good based on excellent performance in moderate-income tracts and adequate performance in low-income tracts. In 2013, M&T's small business performance in low-income census tracts was adequate. In 2013, M&T originated 4.9% by number and 5.7% by dollar volume of its small business loans in low-income census tracts compared to the 7.2% of business establishments that were located in low-income census tracts. Performance was comparable to the aggregate's performance of 5.3% by number and 5.1% by dollar volume of small business loans in low-income census tracts. Small business lending in 2012 was comparable to performance in 2013.

In 2013, M&T's small business performance in moderate-income census tracts was excellent. In 2013, M&T originated 17.0% by number and 16.8% by dollar volume of its small business loans in moderate-income census tracts compared to the 14.3% of business establishments that were located in moderate-income census tracts. Performance was significantly above the aggregate's performance of 11.4% by number and 11.0% by dollar volume of its small business loans in moderate-income census tracts. Small business lending in 2012 was comparable to performance in 2013.

#### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 12580 (Baltimore-Towson, MD) assessment area reflects adequate penetration. Overall, lending to LMI borrowers and to small businesses was adequate. Within the MSA there is a wide disparity between housing process and income. As reported by NAR the median housing price in 2013 was six times the income of a low-income individual and 3.7 times the income of a moderate-income individual making it difficult to afford a home. It is also noted that a substantial number of HMDA loans made in this assessment area had unknown incomes reported.

#### *Home Purchase*

M&T's overall level of home purchase lending to LMI borrowers was adequate based on good performance to moderate-income borrowers and poor performance to low-income borrowers. M&T's home purchase lending to low-income borrowers was poor. M&T made 5.3% by number and 2.4% by dollar volume of its home purchase loans to low-income borrowers when 21.4% of families in the MSA assessment area are of low-income. Home purchase performance

was below the performance of the aggregate which made 7.4% by number and 3.4% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2013 home purchase performance was comparable to its 2012 performance as performance was below the demographic and the aggregate.

Home purchase lending to moderate-income borrowers was good. M&T made 17.9% by number and 11.4% by dollar volume of its home purchase loans to moderate-income borrowers when 17.3% of families in the MSA assessment area are of moderate-income. Home purchase performance was below the aggregate which made 20.3% by number and 14.4% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance was below its 2013 performance as performance was below demographic and the aggregate.

### *Refinance*

M&T's overall level of refinance lending to LMI borrowers was adequate based on good performance to moderate-income borrowers and poor performance to low-income borrowers. Refinance lending to low-income borrowers was poor as 5.3% by number and 2.9% by dollar volume of refinance loans were to low-income borrowers compared to 21.4% of families in the MSA assessment area which are of low-income. Performance however, was below the aggregate which made 6.9% by number and 2.3% by dollar volume of its refinance loans to low-income borrowers. M&T's 2012 refinance performance was exceeded its 2013 performance as performance was below the demographic but was favorable in comparison to the aggregate.

Refinance lending to moderate-income borrowers was good. M&T made 11.7% by number and 8.0% by dollar volume of its refinance loans to moderate-income borrowers when 17.3% of families in the MSA assessment area are of moderate-income. Refinance performance was below the aggregate which made 14.8% by number and 8.1% by dollar volume of its refinance loans to moderate-income borrowers. M&T's 2012 refinance exceeded its 2013 performance as performance was below the demographic but was favorable in comparison to the aggregate.

### *Home Improvement*

M&T's overall level of home improvement lending was excellent based on excellent performance to LMI borrowers. M&T's home improvement lending to low-income borrowers was excellent. M&T made 24.9% by number and 7.1% by dollar volume of its home improvement loans to low-income borrowers when 21.4% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 12.6% by number and 4.1% by dollar volume of its home improvement loans to low-income borrowers. Home improvement performance in 2012 was comparable to 2013's performance as performance exceeded both the demographic and aggregate.

Home improvement lending to moderate-income borrowers was excellent. M&T made 24.9% by number and 23.1% by dollar volume of its home improvement loans to moderate-income borrowers when 17.3% of families in the MSA assessment area are of moderate-income. Home improvement performance was above the aggregate which made 21.8% by number and 13.7% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent as performance exceeded both the demographic and aggregate.

### *Small Business Lending*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 47.5% by number and 30.3% by dollar volume of its small business loans to these businesses, compared to the 89.1% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was similar to the aggregate, which made 47.4% by number and 29.4% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 57.0% of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 92.0% of small business loans in amounts of \$100,000 or less; however, the aggregate includes credit card lenders which typically make small dollar credit facilities. Small business lending performance in 2012 was comparable to the bank's performance in 2013 in comparison to businesses with GAR of \$1 million or less as performance was below the demographic. The percentage of lending in amounts of \$100,000 or less was also below the aggregate's performance.

### **Community Development Lending**

As shown in the table to the right, M&T was a leader in community development lending in MSA 12580 (Baltimore-Towson, MD), with 30 loan originations totaling \$221.4 million, or 94.0% of the bank's Maryland community development lending. M&T ranked 3<sup>rd</sup> out of five similarly-situated banks when comparing annualized

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$( '000s)</b>
Affordable Housing	7	\$89,450
Community Services	12	\$49,715
Economic Development	6	\$11,354
Revitalize and Stabilize	5	\$70,926
<b>Total</b>	<b>30</b>	<b>\$221,445</b>

community development loans to deposits within the MSA 12580 (Baltimore-Towson, MD) assessment area; however, M&T has three times the community development loans of peer institutions.

Performance within the MSA was directed at affordable housing initiatives with 40.0% of all community development activity and revitalization and stabilization with 32.0% of all community development activity.

Examples of community development initiatives included but were not limited to:

- A \$15 million line of credit to a nonprofit organization providing social services to people impacted by poverty in the Baltimore area. The organization is located in a moderate-income tract. Services include operation of food pantries, group homes for those with developmental disabilities, and affordable housing programs for the homeless.
- A \$9.1 million commercial mortgage for the purchase and renovations to a grocery store anchored retail shopping center located in a moderate-income area in Baltimore’s Enterprise Zone. The loan assists in revitalizing the area as the supermarket provides jobs for the areas residents and provides services to the community.
- An \$8.5 million loan to a charter school where the majority of the students receive free and reduced rate lunches.
- A \$35 million loan to a nonprofit organization that seeks to preserve existing rental housing stock and is committed to providing underserved low-income population with better access to decent, safe and well-managed affordable housing. Properties are owned throughout the United States.

## INVESTMENT TEST

As shown in the table to the right, M&T’s level of qualified investments in MSA 12580 (Baltimore-Towson, MD) was excellent and grants in MSA 12580 (Baltimore-Towson, MD), with \$85.3 million of qualified investments. Total qualified investments made in MSA 12580 (Baltimore-Towson, MD) accounted for 83.0% of total qualified investments made in the State of Maryland. Of the assessment area investments, \$84 million or 98.0% were new investments made in the current evaluation period. M&T’s level of qualified investments compared less favorably to that of similarly-situated large retail banks operating in the assessment area when annualized qualified investments are compared to deposits in the MSA; however, M&T has substantially more deposits.

QUALIFIED INVESTMENTS		
Purpose	#	\$(‘000s)
Affordable Housing	44	\$40,331
Community Services	187	\$16,799
Economic Development	4	\$1,116
Revitalize & Stabilize	2	\$765
Neighborhood Stabilization	2	\$26,300
<b>Total</b>	<b>239</b>	<b>\$85,311</b>

M&T made extensive use of innovative or complex investments to support community development initiatives, with 30.0% of assessment area investments made in LIHTC projects and 31.0% in a project under HUD’s Neighborhood Stabilization Program. M&T also exhibited excellent responsiveness to the credit and community development needs of the assessment area. Of the assessment area investments, 17.0% were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments.

The following are examples of qualified investments that met critical needs in the assessment area:

- Two equity investments totaling \$26 million in a neighborhood stabilization project that will provide funding to LMI and middle-income persons for the acquisition and redevelopment of foreclosed, abandoned, or vacant residential properties in Baltimore, Maryland.
- A \$14 million bond to finance a charter school that provides day school programs, group homes, and foster care to children and adolescents with emotional and behavioral challenges in a low income area of the City of Baltimore.
- Multiple grants totaling \$2.8 million to organizations that support various community development activities throughout this assessment area.

## **SERVICE TEST**

M&T's performance under the service test in MSA 12580 (Baltimore-Towson, MD) was excellent based on good branch distribution and being a leader in providing community development services.

M&T's performance under the service test in MSA 12580 (Baltimore-Towson, MD) was excellent based on delivery systems that were accessible to all portions of the assessment area, changes in branch locations that did not adversely affect accessibility, and hours and services that are tailored to the convenience and needs of the assessment area. M&T was also a leader in providing community development services.

## **Retail Services**

M&T's delivery systems were accessible to geographies and individuals of different income levels in the assessment area. M&T operated 103 branches in MSA 12580. Of the total branches, eight (8.0%) were located in low-income areas and 17 (17.0%) were in moderate-income areas, compared to 9.0% and 20.0% of the MSA's population that resides in low- and in moderate-income areas, respectively.

Alternative delivery systems enhanced the bank's performance in the assessment area. M&T had 189 off-site ATM locations in the MSA; 16 (8.0%) of which were located in low-income tracts and 23 (12.0%) were in moderate-income tracts.

The bank's record of opening and closing branches did not adversely affect the accessibility of its delivery system, particularly to LMI geographies or LMI individuals. During the evaluation period, M&T did not open branches in MSA 12580 (Baltimore-Towson, MD). The bank closed 11 branches, of which two were in low-income tracts and two were in moderate-income tracts.



The bank's hours and services are tailored to the needs and convenience of its assessment area, particularly LMI geographies or LMI individuals. Of the bank's 103 branches in the MSA, 96, or 93.0%, have either-early morning, late evening hours, or Saturday hours. Of the 25 branches in LMI census tracts, 24, or 96.0%, had extended or Saturday hours.

### Community Development Services

M&T was a leader in providing community development services in this MSA. The table to the right shows the number and type of services the bank provided during the evaluation period. Most of the seminars covered mortgage education topics for LMI borrowers. In addition, management and staff served as directors, advisors or committee members to 105 nonprofit and community based organizations throughout the bank's assessment area.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	326
Financial Literacy	3
Small Business Seminars	14
Technical Assistance	1
<b>Total</b>	<b>344</b>

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 41540 (SALISBURY, MD)

A limited evaluation of M&T's performance in MSA 41540 (Salisbury, MD) was completed. M&T's assessment area in this MSA consists of Wicomico County. According to the 2010 Census the MSA has 3.0% of the State of Maryland assessment area's population. The City of Salisbury in the MSA is the principal city of Wicomico County.

During the 2012 and 2013 evaluation period M&T had 3.0% of its Maryland HMDA and small business lending activity in this MSA and maintains four branches. None of the branches are in the 5 LMI census tracts which contain 10.0% of all owner-occupied housing units and 37.0% of all families in the assessment area. The four branches operating in MSA 41540 generated 1.0% of deposits in Maryland as of June 30, 2013. M&T ranks 5<sup>th</sup> out of 12 banks in the MSA with 11.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 41540 (SALISBURY, MD)

Examiners conducted a limited scope review of the bank's CRA performance in the MSA 41540 (Salisbury, MD) assessment area. They determined that the bank's performance in the MSA was not consistent with the bank's overall performance under the lending, investment, and service tests in the State of Maryland; however, it does not change the rating for Maryland. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 41540	Consistent	Below	Below

The overall lending test rating for the State of Maryland was high satisfactory. M&T's lending test performance in the MSA 41540 (Salisbury, MD) was consistent with this performance based on good lending activity and geographic distribution performance while borrower distribution performance was adequate. Community development lending performance was also good with \$12.7 million in community development lending or 5.0% of all M&T's community development lending in Maryland. Performance under both the investment test and the service test was not consistent with the outstanding rating for the State of Maryland. M&T's investment test performance was adequate as less than 1.0% of all qualified investments in Maryland were originated in MSA 41540 (Salisbury, MD) although the assessment area benefited from \$9 million in statewide investments in Maryland. Performance under the service test was also not consistent in both retail and community development services.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 25180 (HAGERSTOWN-MARTINSBURG, MD-WV)

A limited evaluation of M&T's performance in MSA 25180 (Hagerstown-Martinsburg, MD-WV) was completed. M&T's assessment area in this MSA consists of Washington County, MD. According to the 2010 Census, the MSA has 5.0% of the State of Maryland assessment area's population. The City of Hagerstown, MD in the MSA is the principal city of Washington County.

During the 2012 and 2013 evaluation period M&T had 8.0% of its Maryland HMDA and small business lending activity in this MSA and maintains 10 branches. Five of the branches are in the nine LMI census tracts which contain 15.0% of all owner-occupied housing units and 38.0% of all families in the assessment area. The 10 branches operating in MSA 25180 generated 3.0% of deposits in Maryland as of June 30, 2013. M&T ranks 3<sup>rd</sup> out of 12 banks in the MSA with 19.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 25180 (HAGERSTOWN-MARTINSBURG, MD-WV)

Examiners conducted a limited scope review of the bank's CRA performance in MSA 25180 (Hagerstown-Martinsburg, MD-WV). They determined that the bank's performance in the MSA was not consistent with the bank's overall performance under the lending, investment, and service tests the State of Maryland; however, it does not change the rating for Maryland. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 25180	Consistent	Below	Consistent

The overall lending test rating for the State of Maryland was high satisfactory. M&T's lending test performance in MSA 25180 (Hagerstown-Martinsburg, MD-WV) was consistent with this performance based on good lending activity, geographic distribution performance, and borrower distribution performance. Community development lending performance was adequate with less than 1.0% of all M&T's community development lending in Maryland. Performance under the investment test was not consistent with the outstanding rating for the State of Maryland. M&T's investment test performance was adequate as less than 1.0% of all qualified investments in Maryland were originated in MSA 25180 (Hagerstown-Martinsburg, MD-WV) although the assessment area benefited from \$9 million in statewide investments in Maryland. Performance under the service test was consistent with the state's outstanding rating for both retail and community development services.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD NONMETROPOLITAN AREA GROUP A (CAROLINE, DORCHESTER, AND TALBOT COUNTIES)

A limited evaluation of M&T's performance in MD Nonmetropolitan area Group A (Caroline, Dorchester, and Talbot Counties, MD) was completed. Located on the eastern shore of Maryland, these three counties have 3.0% of the State of Maryland assessment area's population, according to the 2010 Census.

During the 2012 and 2013 evaluation period, M&T had 3.0% of its Maryland HMDA and small business lending activity in MD Nonmetropolitan area Group A (Caroline, Dorchester, and Talbot Counties, MD). M&T maintained three branches in the assessment area, two of which were located in LMI census tracts. Within the assessment area, 41.7% of families are designated as LMI, and 20.0% of owner-occupied housing units are located in its seven LMI census tracts. The three branches operating in the assessment area generated less than 1.0% of the bank's deposits in Maryland as of June 30, 2013. M&T ranks 8<sup>th</sup> out of 14 banks in this assessment area, with 6.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD NONMETROPOLITAN AREA GROUP A (CAROLINE, DORCHESTER, AND TALBOT COUNTIES)

Examiners conducted a limited scope review of the bank's CRA performance in MD Nonmetropolitan area Group A (Caroline, Dorchester, and Talbot Counties, MD). Examiners determined that the bank's performance in the assessment area was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Maryland. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MD Nonmetropolitan area Group A	Below	Below	Consistent

The overall lending test rating for the State of Maryland was high satisfactory. M&T's lending test performance in MD Nonmetropolitan area Group A (Caroline, Dorchester, and Talbot Counties, MD) was not consistent with the performance on the state level, as lending activity, geographic distribution, and borrower distribution performance were considered adequate. Additionally, the bank did not report community development lending in the assessment area. Performance under the investment test was not consistent with the outstanding rating for the State of Maryland. M&T's investment test performance was adequate as 5.0% of all qualified investments in Maryland were originated in MD Nonmetropolitan area Group A (Caroline, Dorchester, and Talbot Counties, MD), although the assessment area benefited from \$9 million

in statewide investments in Maryland. Performance under the service test was consistent with the bank's excellent performance in Maryland, based on excellent retail services and good community development services.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD NONMETROPOLITAN AREA GROUP B (ST. MARY'S COUNTY)

A limited evaluation of M&T's performance in MD Nonmetropolitan area Group B (St. Mary's County) was completed. According to the 2010 Census, the county has 3.0% of the State of Maryland assessment area's population. Its county seat is the town of Leonardtown. In 2014, the Office of Management and Budget made St. Mary's County MSA 15680 (California-Lexington Park, MD). Any community development activities that occurred in St. Mary's County between January 1, 2014 and August 31, 2014 were evaluated as part of MD Nonmetropolitan area Group B (St. Mary's County).

During the 2012 and 2013 evaluation period M&T had 1.0% of its Maryland HMDA and small business lending activity in this assessment area and maintained one branch, which was located in a middle-income census tract. Within the assessment area, 27.7% of families are designated as LMI, and 3.1% owner-occupied housing units are located in its two moderate-income census tracts. The bank's branch in the assessment area generated less than 1.0% of deposits in Maryland as of June 30, 2013. M&T ranks 8<sup>th</sup> out of 10 banks in this assessment area, with 3.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD NONMETROPOLITAN AREA GROUP B (ST. MARY'S COUNTY)

Examiners conducted a limited scope review of the bank's CRA performance in MD Nonmetropolitan area Group B (St. Mary's County). They determined that the bank's performance in the assessment area was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Maryland. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MD Nonmetropolitan area Group B	Below	Below	Below

The overall lending test rating for the State of Maryland was high satisfactory. M&T's lending test performance in MD Nonmetropolitan area Group B (St. Mary's County) was not consistent with the performance on the state level, as lending activity, geographic distribution, and borrower distribution performance were considered adequate. Additionally, the bank did not report any community development lending in the assessment area. Performance under both the investment test and the service test was not consistent with the outstanding rating for the State of Maryland. M&T's investment test performance was adequate as the assessment area benefited

from \$9 million in statewide investments. Performance under the service test was not consistent with the bank's excellent performance on the state level.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD NONMETROPOLITAN AREA GROUP C (WORCESTER COUNTY)

A limited evaluation of M&T's performance in MD Nonmetropolitan area Group C (Worcester County) was completed. According to the 2010 Census, the county has 2.0% of the State of Maryland assessment area's population. In 2014, the Office of Management and Budget added Worcester County to MSA 41540 (Salisbury, MD-DE), a new multistate MSA. Any community development activities that occurred in Worcester County between January 1, 2014 and August 31, 2014 were evaluated as part of MD Nonmetropolitan area Group C (Worcester County).

During the 2012 and 2013 evaluation period, M&T had 2.0% of its Maryland HMDA and small business lending activity in MD Nonmetropolitan area Group C and maintained two branches, which were located in moderate-income census tracts. Within the assessment area, 40.8% of families are designated as LMI, and 19.5% of owner-occupied housing units are located in its four moderate-income census tracts. The two branches in the assessment area generated less than 1.0% of M&T's deposits in Maryland as of June 30, 2013. M&T ranks 6<sup>th</sup> out of 13 banks in this assessment area, with 6.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD NONMETROPOLITAN AREA GROUP C (WORCESTER COUNTY)

Examiners conducted a limited scope review of the bank's CRA performance in MD Nonmetropolitan area Group C (Worcester County). Examiners determined that the bank's performance in the assessment area was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Maryland. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MD Nonmetropolitan area Group C	Below	Below	Consistent

The overall lending test rating for the State of Maryland was high satisfactory. M&T's lending test performance in MD Nonmetropolitan area Group C (Worcester County) was not consistent with the performance on the state level, as lending activity, geographic distribution, and borrower distribution performance were considered adequate. Community development lending was good, with \$1.1 million in community development loans in the assessment area. Performance under the investment test was not consistent with the outstanding ratings for the State of Maryland. M&T's investment test performance was adequate as the assessment area benefited from \$9 million in statewide investments in Maryland. Performance under the service



test was consistent with the bank's excellent performance on the state level, based on excellent retail services and adequate community development services.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD NONMETROPOLITAN AREA GROUP D (GARRETT COUNTY)

A limited evaluation of M&T's performance in MD Nonmetropolitan area Group D (Garrett County) was completed. According to the 2010 Census, the county has 1.0% of the State of Maryland assessment area's population. Garrett County is the westernmost county in the State of Maryland. The town of Oakland is the county seat.

During the 2012 and 2013 evaluation period M&T had 2.0% of its Maryland HMDA and small business lending activity in MD Nonmetropolitan area Group D (Garrett County) and maintained three branches, one of which was located in an LMI census tract. Within the assessment area, 51.2% of families are designated as LMI, and 55.7% of owner-occupied housing units are located in its four moderate-income census tracts. The three branches in the assessment area generated less than 1.0% of deposits in Maryland as of June 30, 2013. M&T ranks 3<sup>rd</sup> out of five banks in this assessment area, with 16.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD NONMETROPOLITAN AREA GROUP D (GARRETT COUNTY)

Examiners conducted a limited scope review of the bank's CRA performance in MD Nonmetropolitan assessment area Group D (Garrett County). Examiners determined that the bank's performance in the assessment area was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Maryland. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MD Nonmetropolitan area Group D	Consistent	Below	Consistent

The overall lending test rating for the State of Maryland was high satisfactory. M&T's lending test performance in MD Nonmetropolitan area Group D (Garrett County) was consistent with this performance based on good lending activity and geographic distribution, and adequate borrower distribution performance. Community development lending performance was adequate, with \$34,000 in community development lending in the assessment area. Performance under the investment test was not consistent with the outstanding rating for the State of Maryland. M&T's investment test performance was adequate as \$3,000 in grants and donations were made in MD Nonmetropolitan area Group D (Garrett County) and the assessment area benefited from \$9 million in statewide investments in Maryland. Performance under the service

test was consistent with the bank's excellent statewide performance, based on excellent retail services and adequate community development services.

As previously mentioned, limited scope reviews were conducted for the below listed assessment areas in the State of Maryland. The data reviewed, including performance and demographic information, can be found in the Maryland tables in Appendices E, F, G, and H. Conclusions regarding the bank's performance on the lending, investments, and service tests were compared with the overall state rating, which was based on the full-scope assessment area performance. Please see below for a summary of the ratings.

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 41540	Consistent	Below	Below
MSA 25180	Consistent	Below	Consistent
MD Nonmetropolitan area Group A	Below	Below	Consistent
MD Nonmetropolitan area Group B	Below	Below	Below
MD Nonmetropolitan area Group C	Below	Below	Consistent
MD Nonmetropolitan area Group D	Consistent	Below	Consistent

M&T's performance in the limited-scope assessment areas did not change the overall state rating.

## STATE OF PENNSYLVANIA

### ***CRA RATING FOR PENNSYLVANIA<sup>8</sup>: SATISFACTORY***

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

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

***The Service test is rated: Outstanding***

The major factors supporting the rating include:

- A relatively high level of community development lending;
- A significant level of qualified investments;
- Adequate responsiveness to assessment area credit needs;
- Good geographic distribution of loans in the bank's assessment areas;
- Good distribution of loans among borrowers of different income levels and businesses of different sizes;
- Delivery systems were readily accessible to geographies and individuals of different income levels; and
- A leader in providing community development services.

### **SCOPE OF EXAMINATION**

Examiners conducted full-scope reviews of the following five assessment areas in the State of Pennsylvania: MSA 49620 (York-Hanover, PA), MSA 25420 (Harrisburg-Carlisle, PA), MSA 42540 (Scranton—Wilkes-Barre, PA), PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties), and MSA 11020 (Altoona, PA). M&T's combined full-scope areas make up 73.0% of the deposits and 61.0% of the loans originated in the Pennsylvania assessment areas during the review period. In order to derive the state rating, the full-scope assessment areas were weighted based on the proportion of loan originations, deposits, and branches in each area. Limited reviews were conducted of the remaining Pennsylvania assessment areas:

- MSA 39740 (Reading, PA)
- MSA 44300 (State College, PA)
- MSA 29540 (Lancaster, PA)
- MSA 48700 (Williamsport, PA)

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<sup>8</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

- MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)
- MSA 30140 (Lebanon, PA)
- PA Nonmetropolitan area Group B (Monroe County)
- PA Nonmetropolitan area Group C (Adams, Bedford, Franklin, and Huntingdon Counties)
- PA Nonmetropolitan area Group D (Clearfield and Clinton Counties)

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN PENNSYLVANIA**

The Pennsylvania assessment areas have M&T's second largest branch presence, third largest proportion of deposits, and second largest proportion of loans. As detailed in Exhibit I on page 10, as of December 31, 2013, M&T operated 23.0% of its branches in the State of Pennsylvania. The FDIC reported that as of June 30, 2013, 13.0% of all branch deposits were held in the Pennsylvania assessment areas. Pennsylvania also generated approximately 17.0% of the bank's combined total home purchase, home improvement, refinance, and small business originations during the evaluation period. See Exhibit VI, Summary of Key Assessment Area Data on page 168, for additional assessment area data for the State of Pennsylvania.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA**

### **LENDING TEST**

M&T's lending test performance is rated high satisfactory based on good performance in meeting the credit needs of the assessment areas of MSA 49620 (York-Hanover, PA), MSA 25420 (Harrisburg-Carlisle, PA), and MSA 42540 (Scranton—Wilkes-Barre, PA). Lending test performance was adequate in meeting the credit needs of the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) and MSA 11020 (Altoona, PA) assessment areas. Some data used to evaluate the bank's performance in the state assessment areas appear in Appendices E, G, and H.

### **Lending Activity**

M&T's lending activity showed adequate responsiveness to retail credit needs in the bank's assessment areas when measured in terms of the number and dollar amount of HMDA-related and small business loans originated and purchased in each assessment area. This conclusion is based on adequate lending activity in all full scope assessment areas.

	EXHIBIT VI: Summary of Key Assessment Area Data: State of Pennsylvania Assessment Areas														
	49620	25420	42540	Group A	11020	Group C	39740	29540	44300	48700	10900	30140	Group D	Group B	PA Totals
Total Population <sup>4</sup>	434,972	503,506	563,631	482,078	127,089	304,360	411,442	460,483	153,990	116,111	712,481	133,568	120,880	169,842	4,694,433
Population % of AA population	9%	11%	12%	10%	3%	6%	9%	10%	3%	2%	15%	3%	3%	4%	100%
Families	118,102	127,513	147,130	126,666	34,060	82,682	106,995	120,071	31,564	31,313	186,008	35,797	31,822	44,945	1,224,668
Families % of AA families	10%	10%	12%	10%	3%	7%	9%	10%	3%	3%	15%	3%	3%	4%	100%
Total Census Tracts <sup>4</sup>	90	114	170	117	34	62	90	87	31	29	156	31	29	33	1,073
Tracts % AA tracts	8%	11%	16%	11%	3%	6%	8%	8%	3%	3%	15%	3%	3%	3%	100%
LMI tracts	20	35	39	17	6	3	27	17	6	3	51	4	7	0	235
LMI tracts % all AA LMI tract	9%	15%	17%	7%	3%	1%	11%	7%	3%	1%	22%	2%	3%	0%	100%
Total Owner-Occupied Units <sup>4</sup>	127,342	138,477	157,034	141,294	37,686	90,202	112,068	119,220	33,011	32,540	196,812	38,439	36,220	48,855	1,309,200
Units % of AA units	10%	11%	12%	11%	3%	7%	9%	9%	3%	2%	15%	3%	3%	4%	100%
Business Establishments <sup>5</sup>	19,404	25,799	26,577	19,561	5,408	15,172	17,521	21,988	7,344	5,877	32,093	5,852	5,057	5,982	213,635
Bus. est. % AA bus. est.	9%	12%	12%	9%	3%	7%	8%	10%	3%	3%	15%	3%	2%	3%	100%
Number of Branches <sup>1</sup>	28	25	14	27	9	14	13	7	6	4	5	2	4	1	159
Branches % all branches	18%	16%	9%	17%	6%	9%	8%	4%	4%	3%	3%	1%	3%	1%	100%
Branches in LMI tracts	3	10	2	6	1	1	1	0	2	0	3	0	0	0	29
LMI branches % AA LMI bran	10%	34%	7%	21%	3%	3%	3%	0%	7%	0%	10%	0%	0%	0%	100%
Branch Deposits (\$'000,000s) <sup>2</sup>	1,621	1,909	997	903	781	535	561	263	366	276	105	74	81	44	8,516
Deposits % AA deposits	19%	22%	12%	11%	9%	6%	7%	3%	4%	3%	1%	1%	1%	0.5%	100%
Deposit Market Share (%)/ Ra	25/1	17/1	9/3	13/1	35/1	12/4	6/6	3/10	13/3	14/3	1/21	4/8	5/8	2/12	3/5
Home Purchase Originations <sup>3</sup>	455	220	430	207	84	303	102	118	66	46	149	44	26	47	2,297
HP originations % AA orig.	20%	10%	19%	9%	4%	13%	4%	5%	3%	2%	6%	2%	1%	2%	100%
Refinance Originations <sup>3</sup>	695	407	411	288	167	433	215	184	127	63	172	71	39	37	3,309
Refi orig. % AA orig.	21%	12%	12%	9%	5%	13%	6%	6%	4%	2%	5%	2%	1%	1%	100%
Home Improvement Origination	142	98	126	211	116	112	39	31	26	36	9	15	51	6	1,018
Home Improvement orig. % AA	14%	10%	12%	21%	11%	11%	4%	3%	3%	4%	1%	1%	5%	1%	100%
Small Business Originations <sup>3</sup>	470	393	343	456	295	260	240	201	97	87	160	37	63	22	3,124
SB orig. % AA orig.	15%	13%	11%	15%	9%	8%	8%	6%	3%	3%	5%	1%	2%	1%	100%
Combined Loan Totals	1,762	1,118	1,310	1,162	662	1,108	596	534	316	232	490	167	179	112	9,748
% of AA Orig.	18%	11%	13%	12%	7%	11%	6%	5%	3%	2%	5%	2%	2%	1%	100%

(1) Branch numbers are as of 12/31/2013. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/13. (3) Originations are loans reported under HMDA or CRA small business reporting for 2012 and 2013. (4) Demographic information was obtained from the 2010 Census. (5) Business establishments information was reported by D&B for 2013.

## **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration throughout the State of Pennsylvania. This conclusion is based on good distribution in MSA 49620 (York-Hanover, PA), MSA 25420 (Harrisburg-Carlisle, PA), MSA 42540 (Scranton—Wilkes-Barre, PA), and PA Nonmetropolitan area Group A, and adequate distribution in MSA 11020 (Altoona, PA). There were no significant lending gaps in the assessment area. For details, refer to the Geographic Distribution section for each full-scope assessment area.

## **Borrower Distribution**

The overall borrower distribution of HMDA-related and small business loans in the State of Pennsylvania was good. This conclusion is based on good performance in MSA 49620 (York-Hanover, PA), MSA 42540 (Scranton—Wilkes-Barre, PA), MSA 11020 (Altoona, PA), and PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment areas, and adequate performance in MSA 25420 (Harrisburg-Carlisle, PA).

## **Community Development Lending**

M&T made a relatively high level of community development loans in the State of Pennsylvania. This conclusion is based on excellent performance in MSA 25420 (Harrisburg-Carlisle, PA), and good performance in MSA 49620 (York-Hanover, PA). Performance in the MSA 42540 (Scranton—Wilkes-Barre, PA), PA Nonmetropolitan area Group A, and MSA 11020 (Altoona, PA) assessment areas was adequate.

During the evaluation period, M&T originated 44 community development loans totaling \$236 million in the State of Pennsylvania of which \$211.7 million were community loans inside of its assessment area. Since M&T was considered responsive to the credit and community development needs in the state, M&T received credit for four community development loans totaling \$24 million that were made outside its assessment areas but within the State of Pennsylvania. Community development lending efforts targeted all areas of community development with 46.0% targeting the revitalization and stabilization of LMI geographies and 26.0% directed at community service initiatives. Community contacts in the state identified revitalization and stabilization, and economic development-related community development lending for job creation as important credit needs.

## **INVESTMENT TEST**

M&T's performance under the investment test was rated high satisfactory in the State of Pennsylvania. In the state, M&T had a significant level of qualified community development investments that exhibited good responsiveness to credit and community development needs.



This conclusion was based on excellent performance in the assessment areas of MSA 49620 (York-Hanover, PA) and MSA 42540 (Scranton—Wilkes-Barre, PA), good performance in MSA 25420 (Harrisburg-Carlisle, PA), and adequate performance in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) and MSA 11020 (Altoona, PA) assessment areas.

M&T made \$67.1 million in total qualified investments in the State of Pennsylvania, which represents 11.7% of the bank's total investment activity. Investment activity was primarily in MSA 42540 (Scranton—Wilkes-Barre, PA) with \$17 million of investments, MSA 49620 (York-Hanover, PA) with \$13 million, and the limited scope assessment area MSA 29540 (Lancaster, PA) with \$9 million. Total investments for the state also included \$142 thousand of investments made to the broader statewide area that includes the assessment areas. In addition, 41.6 million or 62.0% of M&T's investments in the State of Pennsylvania were new investments made in the current evaluation period.

M&T made extensive use of complex investments to support community development initiatives in the State of Pennsylvania. Approximately \$55 million or 81.0% of the qualified investments were invested in LIHTCs, which have intricate accounting requirements.

## **SERVICE TEST**

M&T's performance under the service test in the State of Pennsylvania was excellent. This conclusion was based on excellent performance in MSA 49620 (York-Hanover, PA), MSA 25420 (Harrisburg-Carlisle, PA), and in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment areas, and good performance in MSA 42540 (Scranton—Wilkes-Barre, PA) and MSA 11020 (Altoona, PA).

## **Retail Services**

M&T has 159 banking centers in Pennsylvania, which represents 23.0% of M&T's total branches. Retail delivery systems are readily accessible to all geographies, including LMI geographies, individuals of different income levels, and businesses of different revenue sizes in the institution's assessment areas. Retail service distribution was excellent in MSA 49620 (York-Hanover, PA), MSA 25420 (Harrisburg-Carlisle, PA), Nonmetropolitan area Group A, and MSA 11020 (Altoona, PA), and good in MSA 42540 (Scranton—Wilkes-Barre, PA).

M&T's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI families. Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, including LMI geographies in the full scope assessments areas in Pennsylvania.

## **Community Development Services**

M&T was a leader in providing community development services in Pennsylvania. M&T has excellent performance in MSA 49620 (York-Hanover, PA) and MSA 42540 (Scranton—Wilkes-Barre, PA), and good performance in MSA 25420 (Harrisburg-Carlisle, PA), Nonmetropolitan area Group A, and MSA 11020 (Altoona, PA).

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 49620 (YORK-HANOVER, PA)

MSA 49620 (York-Hanover, PA) is located in south central Pennsylvania and consists of York County. This MSA is a competitive marketplace where large regional banks compete with community banks, savings and loan associations, and non-financial institutions. M&T's primary competitors in this assessment area include PeoplesBank, Susquehanna Bank, Sovereign Bank, and Fulton Bank.

As of December 31, 2013, M&T operated 28 branches in MSA 49620 (York-Hanover, PA). Based on deposits reported to the FDIC as of June 30, 2013, M&T ranks 1<sup>st</sup> in MSA 49620 (York-Hanover, PA), with \$1.6 billion in deposits, or 25.0% of the retail deposit market.

#### Community Contacts

To ascertain the credit needs of the area, information was obtained through contacts with nonprofit agencies and local government. The contacts indicated a need for affordable housing for seniors, bi-lingual home buyer education programs, down payment and closing cost assistance.

Another contact with a nonprofit community development fund indicated a need for loan capital to help meet the area's small business credit needs. The contact indicated that start-ups are having difficulty obtaining financing and there is a need for this type of financing in the region.

### PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

#### Demographic Characteristics

According to the 2010 Census, MSA 49620 (York-Hanover, PA) had a population of 434,972 which is estimated to have increased by 0.9% to 438,965 as of 2013 year end. The MSA's population is spread throughout York County. The City of York is the largest municipality but contains only 10.0% of the total county population. Some of the growth in the county can be attributed to southern York County's proximity to the Baltimore and Washington, DC metropolitan areas, where home prices and the cost of living are considerably higher.

Income Characteristics

As shown in the table to the right, the FFIEC-adjusted MFI for MSA 49620 (York-Hanover, PA) assessment area was \$70,300 in 2012 and \$71,200 in 2013. The 2010 Census indicates that 36.5% of families in the MSA are designated as LMI. Families living below the poverty level represented 6.3% of the total families in the assessment area.

<b>FFIEC MEDIAN FAMILY INCOMES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 49620	\$70,300	\$71,200

Housing Characteristics

According to the 2010 Census, the MSA 49620 (York-Hanover, PA) assessment area contained 176,312 housing units. One- to four-family units comprised of 92.8% of the housing units, while five or more family units comprised 7.2%. In addition, 72.0% of housing units in the MSA are owner-occupied, while only 9.1% of owner-occupied units are in LMI tracts. As shown in the table above, according to NAR, the average home price slightly increased by approximately 3.0% over the evaluation period. The median rent is approximately \$747; however, close to 42.0% of renters pay more than 30.0% of their income for rent. Thus, housing affordability is a significant issue for some lower income residents. Moreover, while the median age of housing stock in the assessment area is 38 years, the housing stock in LMI tracts is considerably older at 61 years.

<b>AVERAGE HOME PRICE</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 49620	\$146,800	\$150,500

The housing market in York County expanded significantly in recent years as people moved to the area in search of more affordable housing. Much of the increase was attributed to southern York County's proximity to Baltimore and Washington, DC.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 19,404 businesses in 2013, of which 90.0% were small businesses with GAR of \$1 million or less.

The largest employers in York County include York Hospital, Wal-Mart Stores, Giant Food Corporation, and Wellspan Medical Group. Employment within MSA 49620 (York-Hanover, PA) depends on the trade, transportation, and utilities sector with roughly 38,200 employees. In addition, the manufacturing sector and educational and health services sector have a high concentration of employees, with 31,100 and 26,200, respectively. While manufacturing jobs have declined since 2000, job growth going forward is expected to continue in several other sectors, including education and health services and the transportation and utility sectors.

As shown in the table to the right, unemployment in the MSA 49620 (York-Hanover, PA) assessment area decreased during the evaluation period. Rates are comparable to those in Pennsylvania overall.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 49620	7.8%	7.0%
State of Pennsylvania	7.9%	7.4%

Additional performance context data for this assessment area is provided in the MSA 49620 (York-Hanover, PA) Assessment Area Demographics table on the next page.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 49620</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	12.2	6,006	5.1	2,485	41.4	20,765	17.6
Moderate-income	9	10.0	8,776	7.4	1,135	12.9	22,305	18.9
Middle-income	53	58.9	79,280	67.1	3,382	4.3	28,963	24.5
Upper-income	17	18.9	24,040	20.4	496	2.1	46,069	39.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>90</b>	<b>100.0</b>	<b>118,102</b>	<b>100.0</b>	<b>7,498</b>	<b>6.3</b>	<b>118,102</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	12,507	3,450	2.7	27.6	6,918	55.3	2,139	17.1
Moderate-income	14,970	8,145	6.4	54.4	5,972	39.9	853	5.7
Middle-income	116,816	88,591	69.6	75.8	22,826	19.5	5,399	4.6
Upper-income	32,019	27,156	21.3	84.8	3,542	11.1	1,321	4.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>176,312</b>	<b>127,342</b>	<b>100.0</b>	<b>72.2</b>	<b>39,258</b>	<b>22.3</b>	<b>9,712</b>	<b>5.5</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	1,282	6.6	1,068	6.1	147	11.6	67	9.8
Moderate-income	1,448	7.5	1,272	7.3	134	10.6	42	6.2
Middle-income	12,904	66.5	11,635	66.6	803	63.6	466	68.4
Upper-income	3,770	19.4	3,485	20.0	179	14.2	106	15.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>19,404</b>	<b>100.0</b>	<b>17,460</b>	<b>100.0</b>	<b>1,263</b>	<b>100.0</b>	<b>681</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.0</b>		<b>6.5</b>		<b>3.5</b>

Based on 2010 ACS Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 49620 (YORK-HANOVER, PA)

### LENDING TEST

M&T's performance under the lending test in MSA 49620 (York-Hanover, PA) was good. This conclusion is based on adequate lending activity performance, good geographic and borrower distribution performance, and being a leader in making community development loans. Some of

the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in MSA 49620 (York-Hanover, PA) reflect adequate responsiveness to assessment area credit needs. This conclusion was based on lending volume in the current evaluation period in comparison to the prior evaluation period's lending volume, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was similar to the aggregate's lending activity.

M&T's market share of deposits in the assessment area and its market share of lending were stable, with the exception of small business lending, which decreased. In 2013, M&T had deposit market share of 25.0%, and lending market share of 4.0% in home purchase lending, 3.0% in refinance lending, 7.0% in home improvement lending, and 5.0% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 23.0%, and lending market share was 4.0% in home purchase lending, 3.0% in refinance lending, 7.0% in home improvement lending, and 7.0% in small business lending.

HMDA and small business volumes during the current evaluation period decreased by 5.0% compared to the previous evaluation. This decrease was driven by decreases in home improvement (-11.0%) and small business loan volumes (-22.0%), partially offset by increased home purchase (2.0%) and refinance (6.0%) loan volumes. Comparisons to the aggregate data for the evaluation period indicated overall similar lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was below the lending volume of similarly-situated banks.

### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration in the MSA 49620 (York-Hanover, PA) assessment area. Lending penetration in LMI geographies was good for home purchase and refinance lending, and excellent for home improvement and small business lending. M&T demonstrated overall low level of lending gaps. Lending gaps are considered minimal because between 2012 and 2013, there was a high level of penetration rates in low-, moderate-, middle-, and upper-income census tracts. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	11	2	82%
Moderate	9	0	100%
Middle	53	0	100%
Upper	17	0	100%
<b>2012</b>			
Low	11	2	82%
Moderate	9	1	89%
Middle	53	0	100%
Upper	17	1	94%

### *Home Purchase*

The overall distribution of home purchase loans in LMI census tracts was good based on good distribution in moderate-income tracts and adequate distribution in low-income tracts. M&T's home purchase lending in low-income census tracts was adequate. In 2013, M&T made 1.6% or four of its home purchase loans by number and 0.7% by dollar volume in low-income census tracts. M&T's home purchase lending was below the demographic which indicated that 2.7% of owner-occupied housing units were located in low-income census tracts but similar to the aggregate's performance of 2.0% of its home purchase loans by number and less than 0.9% by dollar volume in low-income census tracts. Home purchase lending in 2012 was comparable to 2013's performance.

Home purchase lending in moderate-income census tracts was good. In 2013, M&T made 5.7% of its home purchase loans by number and 3.6% by dollar volume in moderate-income census tracts which was similar to the demographic which also had 6.4% of owner-occupied housing units in moderate-income census tracts. M&T's home purchase performance was similar to the aggregate which made 5.5% of its home purchase loans by number and 3.6% by dollar volume in moderate-income census tracts. Home purchase lending in 2012 exceeded 2013's performance.

### *Refinance*

The overall distribution of refinance loans was good based on good distribution in LMI census tracts. Refinance lending in low-income census tracts was good. In 2013, M&T made 2.9% of its refinance loans by number and 2.5% by dollar volume in low-income census tracts. Refinance lending performance was similar to the demographic which had 2.7% of owner-occupied housing units in low-income census tracts. Refinance lending was above the aggregate which made 1.2% of its refinance loans by number and 0.5% by dollar volume in low-income census tracts. Refinance lending in 2013 exceeded 2012's performance.



M&T's refinance lending in moderate-income census tracts was good. In 2013, M&T made 5.7% of its refinance loans by number and 3.9% by dollar volume in moderate-income census tracts. This was similar to the demographic which indicated 6.4% of owner-occupied housing units were located in moderate-income census tracts. M&T's refinance lending was above the aggregate which made 5.0% of its refinance loans by number and 2.5% by dollar volume in moderate-income census tracts. Refinance lending in 2012 was comparable to 2013.

### *Home Improvement*

The overall distribution of home improvement loans in LMI census tracts was excellent based on excellent distribution in moderate-income tracts and good distribution in low-income tracts. Home improvement lending in low-income census tracts was good as M&T made 5.2% (3 loans) by number and 1.7% by dollar volume of its home improvement loans in low-income census tracts which was above the 2.7% of owner-occupied housing units located in low-income census tracts. M&T's home improvement performance was also above the aggregate which made 3.0% of its home improvement loans by number and 1.5% by dollar volume in moderate-income census tracts. Home improvement lending in 2012 was below 2013's lending as the bank made only one home improvement loan in a low-income census tract.

M&T's home improvement lending in moderate-income census tracts was excellent. The bank's home improvement lending was above the demographics of the assessment area, which indicate that 6.4% of the available owner-occupied housing units are located in moderate-income census tracts. The bank made 12.1% of home improvement loans by number and 4.0% in dollar volume in moderate-income census tracts. Home improvement lending also exceeded the aggregate which made 4.4% of its home improvement loans by number and 2.5% by dollar volume in moderate-income census tracts. Home improvement lending in 2012 was comparable to performance in 2013.

### *Small Business*

The overall distribution of small business loans in LMI census tracts was excellent based on excellent distribution in moderate-income tracts and good distribution in low-income tracts. Small business performance in low-income census tracts was good. In 2013, M&T originated 6.0% of its small business loans by number and 2.9% in dollar volume in low-income census tracts, while 6.6% of all business establishments were located in low-income census tracts. Small business lending was similar to the aggregate which made 5.7% of its small business loans by number and 5.0% in dollar volume in low-income census tracts. Small business lending in 2012 was more favorable than 2013.

Small business performance in moderate-income census tracts was excellent. In 2013, M&T originated 7.7% of its small business loans by number and 5.9% in dollar volume in moderate-income census tracts, which was similar to the aggregate's performance of 8.3% of small business loans by number and 9.0% by dollar volume in moderate-income census tracts. Small

business lending was also similar to the demographics, which indicate that 7.5% of businesses are located in moderate-income census tracts. Small business lending performance in 2012 was comparable to its 2013 performance.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 49620 (York-Hanover, PA) assessment area reflects good penetration. Overall, lending to low-income borrowers and small businesses was adequate while lending to moderate-income borrowers was good.

#### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was good based on excellent distribution to moderate-income borrowers and adequate distribution to low-income borrowers. M&T's home purchase lending to low-income borrowers was adequate. M&T made 8.5% of its home purchase loans by number and 4.9% by dollar volume to low-income borrowers when 17.6% of families in the MSA assessment area are of low-income. Home purchase performance was below the performance of the aggregate which made 10.1% of its home purchase loans by number and 5.9% by dollar volume to low-income borrowers. M&T's 2013 home purchase performance was comparable to its 2012 performance.

Home purchase lending to moderate-income borrowers was excellent. M&T made 28.7% of its home purchase loans by number and 22.8% by dollar volume to moderate-income borrowers when 18.9% of families in the MSA assessment area are of moderate-income. Home purchase performance was above the aggregate which made 24.3% of its home purchase loans by number and 19.8% by dollar volume to moderate-income borrowers. M&T's 2012 home purchase performance was below its 2013 performance.

#### *Refinance*

The overall distribution of refinance loans to LMI borrowers was adequate based on good distribution to moderate-income borrowers and poor distribution to low-income borrowers. Refinance lending to low-income borrowers was poor as 5.0% of refinance loans by number and 2.8% in dollar volume were to low-income borrowers compared to 17.6% of families in the MSA assessment area which are of low-income. Performance was below the aggregate which made 7.0% of its refinance loans by number and 3.1% by dollar volume to low-income borrowers. M&T's 2012 refinance performance was comparable to its 2013 performance.

Refinance lending to moderate-income borrowers was good. M&T made 15.8% of its refinance loans by number and 12.0% by dollar volume to moderate-income borrowers when 18.9% of families in the MSA assessment area are of moderate-income. Refinance performance was

similar to the aggregate which made 16.5% of its refinance loans by number and 9.2% by dollar volume to moderate-income borrowers. M&T's 2012 refinance exceeded its 2013 performance.

### *Home Improvement*

The overall distribution of home improvement loans to LMI borrowers was excellent based on excellent distribution to moderate-income borrowers and good distribution to low-income borrowers. M&T's home improvement lending to low-income borrowers was good. M&T made 12.1% of its home improvement loans by number and 4.7% by dollar volume to low-income borrowers when 17.6% of families in the MSA assessment area are of low-income. Home improvement performance was similar to the performance of the aggregate which made 11.5% of its home improvement loans by number and 7.1% by dollar volume to low-income borrowers. Home improvement performance in 2012 was comparable to 2013's performance.

Home improvement lending to moderate-income borrowers was excellent. M&T made 24.1% of its home improvement loans by number and 13.4% by dollar volume to moderate-income borrowers when 18.9% of families in the MSA assessment area are of moderate-income. Home improvement performance was above the aggregate which made 22.5% of its home improvement loans by number and 17.1% by dollar volume to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent.

### *Small Business Lending*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 52.8% of its small business loans by number and 40.8% by dollar volume to these businesses, compared to the 90.0% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 44.6% of its small business loans by number and 38.8% by dollar volume to businesses with GAR of \$1 million or less. The bank made 54.5% of its small business loans by number and 15.2% by dollar volume in amounts of \$100,000 or less, which was below the aggregate's 90.0% of small business loans by number and 28.6% by dollar volume in amounts of \$100,000 or less. Small business lending performance in 2012 was comparable to the bank's performance in 2013.

### **Community Development Lending**

As shown in the table to the right, M&T made a relatively high level of community development lending loans in MSA 49620 (York-Hanover, PA) with 13 loan originations totaling \$26 million, or 11.0%, of the bank's community development lending activity in the State of Pennsylvania

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	4	\$770
Community Services	7	\$21,025
Revitalize and Stabilize	2	\$4,400
<b>Total</b>	<b>13</b>	<b>26,195</b>

assessment area. M&T ranked favorably compared to six similarly-situated banks when comparing annualized community development loans to deposits within MSA 49620 (York-Hanover, PA).

Performance within MSA 49620 (York-Hanover, PA) included but was not limited to:

- An \$11 million commercial mortgage to an organization that operates a mental illness and substance abuse treatment facility. The property is located in a low-income census tract. Funding is primarily through Medicaid, which contributes over 50% of revenues.
- A \$7 million revolving credit facility to a corporation that owns and operates several nursing homes and continuing care retirement communities in the State of Pennsylvania, primarily serving an LMI community. Proceeds of the credit facility will fund renovations and provide working capital. Funding for the nursing homes and retirement communities is primarily provided through Medicaid.
- A \$400,000 line of credit for working capital to a nonprofit organization that provides services to individuals who are blind or visually impaired. Over 50% of its specialized clients are of low- or moderate-income.

## INVESTMENT TEST

As shown in the table to the right, M&T made an excellent level of qualified community development investments and grants in MSA 49620 (York-Hanover, PA), with 43 qualified investments and grants totaling \$13 million. Total qualified investments made in MSA 49620 (York-Hanover, PA) accounted for 19.0% of total qualified investments made in the State of Pennsylvania. Of the assessment area investments, \$8 million, or 63.0%, were new investments made in the current evaluation period. M&T's level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$(‘000s)</b>
Affordable Housing	16	\$12,053
Community Services	20	\$805
Economic Development	5	\$85
Revitalize & Stabilize	2	\$51
<b>Total</b>	<b>43</b>	<b>\$12,994</b>

M&T made extensive use of complex investments to support community development initiatives, with 76% of assessment area investments made in LIHTC projects. M&T also exhibited excellent responsiveness to the credit and community development needs of the assessment area. Of the assessment area investments, 17.0% were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments. The following are examples of qualified investments that met critical needs in the assessment area:

- A \$7 million LIHTC investment to support the construction of 28 units of affordable housing in York County.
- Eight MBS totaling \$2 million that supports the provision of affordable housing for LMI individuals.
- Multiple grants totaling \$959,000 to organizations that support various community development activities throughout this assessment area.

## **SERVICE TEST**

M&T's performance under the service test in MSA 49620 (York-Hanover, PA) was excellent based on excellent branch distribution and being a leader in providing community development services. M&T's delivery systems were readily accessible, alternative delivery systems slightly enhanced M&T's performance, changes in branch locations did not adversely affect the accessibility of the bank's delivery systems, and the bank's hours and services do not vary in a way that inconveniences its assessment area.

### **Retail Services**

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated 28 branches in this assessment area, of which one (3.0%) was located in a low-income area and two (7.0%) were in moderate-income areas. Retail branch distribution is considered excellent as 7.5% of the branches are in moderate-income census tracts compared to the 7.0% of the population that resides in moderate-income census tracts. One, or 3.0%, of the branches is located in a low-income census tract while 7.0% of the population resides in low-income census tracts.

Alternative delivery systems slightly enhanced M&T's performance in the assessment area. M&T had 60 off-site ATM locations in the assessment area with one (2.0%) located in low-income areas and two (3.0%) in moderate-income areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in MSA 49620 (York-Hanover, PA).

The bank's hours and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or individuals. Of the 28 branches in the MSA, 21, or 75.0%, had early morning, late evening or Saturday hours. Of the three branches in LMI census tracts, all had extended or Saturday hours.

### Community Development Services

As shown in the table to the right, M&T was a leader in providing community development services in the MSA 49620 (York-Hanover, PA). In addition, management and staff served as directors, advisors, or committee members to 21 nonprofit and community based organizations in the MSA 49620 (York-Hanover, PA) assessment area.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	112
Financial Literacy	2
Small Business Seminars	2
<b>Total</b>	<b>116</b>

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 25420 (HARRISBURG-CARLISLE, PA)

As of December 31, 2013, M&T maintained 25 branches in MSA 25420 (Harrisburg-Carlisle, PA), or 15.7% of all its retail branches in Pennsylvania. Based on deposit data reported to the FDIC as of June 30, 2013, these branches contained \$1.9 billion in deposits, or 22.0% of M&T's total branch deposits in the state. With regard to deposit market share, M&T is ranked 1<sup>st</sup> in the MSA, controlling 17.0% of the retail deposit market. Lending in this assessment area accounts for 11.0% of the total lending in M&T's assessment areas located in the State of Pennsylvania.

MSA 25420 (Harrisburg-Carlisle, PA) is a highly competitive marketplace where many large banks compete with numerous community banks, savings and loan associations, credit unions, and nonbank financial institutions. M&T's primary competitors in the MSA are PNC Bank, Wells Fargo Bank, Metro Bank, Susquehanna Bank, and Orrstown Bank.

#### Community Contacts

To ascertain the credit needs of the area, information was obtained through contacts with nonprofit agencies and local government. The contacts indicated a need for affordable housing for seniors, bilingual home buyer education programs, down payment and closing cost assistance.

Another contact with a nonprofit community development fund indicated a need for loan capital to help meet the area's small business credit needs. The contact indicated that start-ups are having difficulty obtaining financing and there is a need for this type of financing in the region.

### PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

#### Demographic Characteristics

M&T's assessment area consists of Cumberland and Dauphin counties in MSA 25420 (Harrisburg-Carlisle, PA). Located in south central Pennsylvania, the core of the assessment area is the state capital of Harrisburg in Dauphin County. Twenty-five of the area's 35 LMI census tracts are located in the City of Harrisburg and neighboring boroughs. The remaining 10 LMI tracts are located in Cumberland County, in the boroughs of Carlisle and Shippensburg, and surrounding rural areas.

Income Characteristics

The FFIEC-adjusted MFI for MSA 25420 (Harrisburg-Carlisle, PA) are listed in the table at right. The MFI decreased by close to 4.0% from 2012 to 2013; however, the MFI for the MSA is still significantly above that of the State of Pennsylvania at \$66,522. The 2010 Census indicates that 36.9% of families in the MSA are designated as LMI. Families living below the poverty level represented 6% of the total families in the assessment area.

FFIEC MEDIAN FAMILY INCOMES		
Area	2012	2013
MSA 25420	\$73,500	\$70,800

Housing Characteristics

The median price of homes in Cumberland and Dauphin Counties varies widely. As shown in the table to the right, the median home price in Cumberland County is 18.0% higher than Dauphin County. The high median home prices in Cumberland County present affordability issues for lower-income residents. Furthermore, the median rent in the assessment area is approximately \$762; however, close to 39.0% of renters pay more than 30.0% of their income for rent.

MEDIAN HOME PRICE	
Area	2014
Cumberland County	\$194,900
Dauphin County	\$164,900

According to the 2010 Census, MSA 25420 (Harrisburg-Carlisle, PA) contained 217,138 housing units. One-to-four family units comprised 86.4% of the housing units, while five or more family units comprised 13.6%. Within this assessment area, 63.8% of housing units are owner-occupied. Just 16.6% of all owner-occupied housing units are located in the LMI census tracts. In regards to the age of the housing stock in the MSA, the median age of housing stock in the LMI tracts is considerably older at 61 years compared to the total median age of 43 years.

The City of Harrisburg has been designated both a Federal Enterprise Community and a State Enterprise Zone. Businesses receive tax incentives to relocate in these areas, while state and federal funds are available to build and rehabilitate housing.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 25,799 businesses in 2013, of which 88.4% were small businesses with GAR of \$1 million or less. Trade, transportation, and utilities is the largest employment sector in the MSA, with roughly 64,500 employees, while the state government is the second largest employment sector with approximately 60,000 employees. The largest employers in the MSA 25420 (Harrisburg-Carlisle, PA) are Giant Food Stores, Penn State Hershey Medical Center, Hershey Entertainment & Resorts, The Hershey Company, Wal-Mart Stores, Inc., JFC Staffing Associates, Highmark Blue Cross Blue Shield and Pinnacle Healthy Systems. Some areas in the MSA, including parts of downtown Harrisburg, are located in Keystone Opportunity Zones. Businesses locating in these areas (designated by the Commonwealth of Pennsylvania) qualify for tax incentives.



As shown in the table to the right, the unemployment rate for MSA 25420 (Harrisburg-Carlisle, PA) is decreasing and remains lower than the state unemployment rate. Unemployment is higher in Dauphin County, compared to Cumberland County, primarily due to high unemployment in the City of Harrisburg.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 25420	7.2%	6.5%
Dauphin County	7.7%	6.9%
Cumberland County	6.6%	6.1%
State of Pennsylvania	7.9%	7.4%

Additional performance context data for this assessment area is provided in the MSA 25420 (Harrisburg-Carlisle, PA) Assessment Area Demographics table on the next page.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 25420</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	6.1	5,638	4.4	2,179	38.6	24,094	18.9
Moderate-income	28	24.6	20,590	16.1	2,484	12.1	22,989	18.0
Middle-income	52	45.6	64,624	50.7	2,917	4.5	28,956	22.7
Upper-income	26	22.8	36,661	28.8	563	1.5	51,474	40.4
Unknown-income	1	0.9	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>114</b>	<b>100.0</b>	<b>127,513</b>	<b>100.0</b>	<b>8,143</b>	<b>6.4</b>	<b>127,513</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	11,862	3,416	2.5	28.8	5,833	49.2	2,613	22.0
Moderate-income	44,765	19,534	14.1	43.6	20,324	45.4	4,907	11.0
Middle-income	106,779	73,056	52.8	68.4	28,180	26.4	5,543	5.2
Upper-income	53,732	42,471	30.7	79.0	8,733	16.3	2,528	4.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>217,138</b>	<b>138,477</b>	<b>100.0</b>	<b>63.8</b>	<b>63,070</b>	<b>29.0</b>	<b>15,591</b>	<b>7.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	751	2.9	637	2.8	41	2.3	73	6.1
Moderate-income	5,982	23.2	5,081	22.3	497	27.4	404	33.9
Middle-income	11,954	46.3	10,658	46.8	801	44.2	495	41.6
Upper-income	7,106	27.5	6,416	28.1	472	26.0	218	18.3
Unknown-income	6	0.0	5	0.0	1	0.1	0	0.0
<b>Total Assessment Area</b>	<b>25,799</b>	<b>100.0</b>	<b>22,797</b>	<b>100.0</b>	<b>1,812</b>	<b>100.0</b>	<b>1,190</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>88.4</b>		<b>7.0</b>		<b>4.6</b>

Based on 2010 ACS Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 25420 (HARRISBURG-CARLISLE, PA)

### LENDING TEST

M&T's performance under the lending test in MSA 25420 (Harrisburg-Carlisle, PA) was good. This conclusion is based on adequate lending activity performance, good geographic distribution performance, adequate borrower distribution, and a leader in making community development loans. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

## **Lending Activity**

M&T's lending levels in MSA 25420 (Harrisburg-Carlisle, PA) reflect adequate responsiveness to assessment area credit needs. This conclusion was based on consideration of the current evaluation period's lending volumes to the prior evaluation period, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was below the aggregate's lending activity.

M&T's market share of deposits and lending in the assessment area was stable overall. In 2013, M&T had deposit market share of 17.0%, and lending market share of 2.0% in home purchase lending, 2.0% in refinance lending, 4.0% in home improvement lending, and 3.0% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 13.0%, and lending market share was 2.0% in home purchase lending, 2.0% in refinance lending, 3.0% in home improvement lending, and 4.0% in small business lending.

HMDA and small business volumes in the current evaluation period decreased by 9.0% compared to the last evaluation. This decrease was driven by decreases in refinance (-12.0%), home improvement (-3.0%), and small business (-14.0%) loan volumes, partially offset by increased home purchase (4.0%) loan volume. Comparisons to the aggregate data for the evaluation period indicated overall decreased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was below the lending volume of similarly-situated banks.

## **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration in the MSA 25420 (Harrisburg-Carlisle, PA) assessment area. Lending penetration in LMI census tracts was excellent for home purchase and home improvement lending, and good for refinance and small business lending. M&T demonstrated overall low level of lending gaps. Lending gaps are considered minimal because between 2012 and 2013, there was a high level of penetration rates in low-, moderate-, middle-, and upper-income census tracts. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	7	0	100%
Moderate	28	4	86%
Middle	52	4	92%
Upper	26	1	96%
<b>2012</b>			
Low	7	2	71%
Moderate	28	5	82%
Middle	52	4	92%
Upper	26	2	92%

### *Home Purchase*

The overall distribution of home purchase loans in LMI census tracts was excellent based on excellent performance in moderate-income census tracts. Because M&T only originated a combined total of three home purchase loans in low-income census tracts during the evaluation period, a meaningful analysis could not be performed.

Home purchase lending in moderate-income census tracts was excellent. In 2013, M&T made 15.0% of its home purchase loans by number and 27.9% by dollar volume in moderate-income census tracts which exceeded the demographic which indicated that 14.1% of owner-occupied housing units were located in moderate-income census tracts. M&T's home purchase performance was above the aggregate which made 12.7% of its home purchase loans by number and 8.2% by dollar volume in moderate-income census tracts. Home purchase lending in 2012 was similar to its 2013's performance.

### *Refinance*

The overall distribution of refinance loans in LMI census tracts was good based on excellent performance in moderate-income census tracts. Because M&T only originated a combined total of three refinance loans in low-income census tracts during the evaluation period, a meaningful analysis could not be performed.

M&T's refinance lending in moderate-income census tracts was excellent. In 2013, M&T made 18.6% of its refinance loans by number and 27.8% by dollar volume in moderate-income census tracts. This was above the demographic which indicated that 14.1% of owner-occupied housing units were located in moderate-income census tracts. M&T's refinance lending was above the aggregate which made 11.4% of its refinance loans by number and 6.5% by dollar volume in moderate-income census tracts. Refinance lending in 2012 was below 2013's performance.

### *Home Improvement*

The overall distribution of home purchase improvement loans in LMI census tracts was excellent based on excellent performance in moderate-income census tracts. Because M&T only originated a combined total of four home improvement loans in low-income census tracts during the evaluation period, a meaningful analysis could not be performed.

Home improvement lending in moderate-income census tracts was excellent. The bank's home improvement lending was above the demographics of the assessment area, which indicate that 14.1% of the available owner-occupied housing units are located in moderate-income census tracts compared to the bank's 17.0% of home improvement loans by number and 11.4% by dollar volume originated. Home improvement lending also exceeded the aggregate which made 11.8% of its home improvement loans by number and 8.4% by dollar volume in moderate-income census tracts. Home improvement lending in 2012 was comparable to performance in 2013.

### *Small Business*

The overall distribution of small business loans in LMI census tracts was good based on excellent performance in low-income census tracts and adequate performance in moderate-income tracts. Small business performance in low-income census tracts was excellent. In 2013, M&T originated 3.2% of its small business loans by number and 1.8% by dollar volume in low-income census tracts while 2.9% of all business establishments are in low-income census tracts. Small business lending was similar to the aggregate which had 3.3% of its small business loans by number and 4.1% by dollar volume in low-income census tracts. Small business lending in 2012 was comparable to 2013's performance.

M&T's small business performance in moderate-income census tracts was adequate. In 2013, M&T originated 16.2% of its small business loans by number and 17.0% by dollar volume in moderate-income census tracts, which was below the aggregate's performance of 20.3% of small business loans by number and 19.8% by dollar volume in moderate-income census tracts. Small business lending was also below the demographics, with 23.2% of businesses operating in moderate-income census tracts. Small business lending performance in 2012 exceeded 2013's performance.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 25420 (Harrisburg-Carlisle, PA) assessment area reflects adequate penetration. Overall, lending to low-income borrowers and small businesses was adequate while lending to moderate-income borrowers was good.

### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was adequate based on adequate performance to low-income borrowers and poor performance with moderate-income borrowers. M&T's home purchase lending to low-income borrowers was adequate. M&T made 8.8% of its home purchase loans by number and 4.3% by dollar volume to low-income borrowers when 18.9% of families in the MSA assessment area are of low-income. Home purchase performance was similar to the performance of the aggregate which also made 8.5% of its home purchase loans by number and 4.4% by dollar volume to low-income borrowers. M&T's 2013 home purchase performance was comparable to its 2012 performance.

Home purchase lending to moderate-income borrowers was poor. M&T made 10.6% of its home purchase loans by number and 5.8% by dollar volume to moderate-income borrowers when 18.0% of families in the MSA assessment area are of moderate-income. Home purchase performance was below the aggregate which made 23.0% of its home purchase loans by number and 16.8% by dollar volume to moderate-income borrowers. M&T's 2012 home purchase performance was comparable to its 2013 performance.

### *Refinance*

The overall distribution of refinance loans to LMI borrowers was good based on adequate performance to low-income borrowers and good performance with moderate-income borrowers. Refinance lending to low-income borrowers was adequate as 6.4% of refinance loans by number and 3.5% by dollar volume were to low-income borrowers compared to 18.9% of families in the MSA assessment area which are of low-income. Performance was similar to the aggregate which made 6.1% of its refinance loans by number and 2.7% by dollar volume to low-income borrowers. M&T's 2012 refinance performance was below its 2013 performance.

Refinance lending to moderate-income borrowers was good. M&T made 16.3% of its refinance loans by number and 10.7% by dollar volume to moderate-income borrowers when 18.0% of families in the MSA assessment area are of moderate-income. Refinance performance was similar to the aggregate which also made 16.3% of its refinance loans by number and 9.0% by dollar volume to moderate-income borrowers. M&T's 2012 refinance exceeded its 2013 performance.

### *Home Improvement*

The overall distribution of home improvement loans was excellent based on excellent performance to LMI borrowers. M&T's home improvement lending to low-income borrowers was excellent. M&T made 20.8% of its home improvement loans by number and 6.7% by dollar volume to low-income borrowers when 18.9% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate

which made 11.6% of its home improvement loans by number and 5.8% by dollar volume to low-income borrowers. Home improvement performance in 2012 was below 2013's performance.

Home improvement lending to moderate-income borrowers was excellent. M&T made 32.1% of its home improvement loans by number and 21.2% by dollar volume to moderate-income borrowers when 18.0% of families in the MSA assessment area are of moderate-income. Home improvement performance was above the aggregate which made 19.9% of its home improvement loans by number and 14.8% by dollar volume to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent.

*Small Business*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 43.8% of its small business loans by number and 30.0% by dollar volume to these businesses, compared to the 88.4% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was similar to the aggregate, which made 43.8% of its small business loans by number and 36.0% by dollar volume to businesses with GAR of \$1 million or less. The bank made 42.2% of its small business loans by number and 9.0% by dollar volume in amounts of \$100,000 or less, which was below the aggregate's 88.3% of small business loans by number and 25.8% by dollar volume in amounts of \$100,000 or less. Small business lending performance in 2012 was comparable to the bank's performance in 2013 in comparison to businesses with GAR of \$ 1 million or less as performance was below the demographic but exceeded the aggregate. The percentage of lending in amounts of \$100,000 or less was also below the aggregate's performance.

**Community Development Lending**

As shown in the table to the right, M&T was a leader in community development lending performance in MSA 25420 (Harrisburg-Carlisle, PA) as M&T made nine community development loans totaling \$62 million, or 26.0% of M&T's community development lending in Pennsylvania. According to dollar volume, revitalization and stabilization initiatives represented 55.0% of total community development lending, economic development initiatives constituted 21.0%, and community services constituted 24.0%. M&T ranked favorably compared to seven similarly-situated banks when comparing annualized community development loans to deposits within MSA 25420 (Harrisburg-Carlisle, PA).

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$(‘000s)</b>
Economic Development	4	\$12,902
Community Services	2	\$14,956
Revitalize and Stabilize	3	\$33,944
<b>Total</b>	<b>9</b>	<b>\$61,802</b>

Examples of community development loan activity included but were not limited to:

- A \$2 million line of credit to a public agency for infrastructure improvements that will primarily benefit an LMI community.
- A \$1 million SBA 504 loan to a manufacturer for the purchase of a building that will allow the manufacturer to substantially expand its operations and increase its capacity. The property is located in an enterprise zone.
- An \$8 million term loan to a woman owned business enterprise that has also been designated a small business entity through the State of Pennsylvania Procurement Initiative. Proceeds will be utilized to expand operations through the acquisition of a small business.

### INVESTMENT TEST

M&T made a significant level of qualified community development investments and grants in MSA 25420 (Harrisburg-Carlisle, PA), occasionally in a leadership position with 118 qualified investments and grants totaling \$5.5 million, as shown in the table to the right. Total qualified investments made in MSA 25420 (Harrisburg-

QUALIFIED INVESTMENTS		
Purpose	#	\$('000s)
Affordable Housing	20	\$4,736
Community Services	82	\$622
Economic Development	10	\$122
Revitalize & Stabilize	6	\$48
<b>Total</b>	<b>118</b>	<b>\$5,528</b>

Carlisle, PA) accounted for 8.2% of total qualified investments made in the State of Pennsylvania. Of total qualified investments, \$2.6 million, or 48.0%, were new investments made in the current evaluation period. M&T's level of qualified investments was comparable to that of similarly-situated large retail banks operating in the assessment area.

M&T exhibited adequate responsiveness to the credit and community development needs of the assessment area. M&T made rare use of innovative or complex investments to support community development initiatives. Of the assessment area investments, \$5 million or 85.0% were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments.

Qualified investment activity also included multiple grants totaling \$816,000 to organizations that support various community development activities throughout this assessment area.

### SERVICE TEST

M&T's performance under the service test in MSA 25420 (Harrisburg-Carlisle, PA) was excellent. M&T's delivery systems were readily accessible, and the bank maintained alternative delivery systems that enhanced the bank's performance. M&T's record of opening and closing of branches did not adversely affect the accessibility of delivery systems, and the bank had hours and services tailored to the convenience and needs of its assessment area. M&T also provided a relatively high level of community development services.



## Retail Services

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operates 25 branches in this assessment area, of which one (4.0%) was located in a low-income area and nine (36.0%) were in moderate-income areas. This compares favorably to the 5.0% and 19.1% of the MSA's population residing in low- and in moderate-income areas, respectively.

Alternative delivery systems enhanced the bank's performance in MSA 25420 (Harrisburg-Carlisle, PA). M&T had 25 off-site ATM locations in the assessment area, with five (20.0%) located in low-income areas and three (12.0%) in moderate-income areas.

M&T's record of opening and closing branches generally did not adversely affect the accessibility of its delivery systems. During the evaluation period, M&T closed three branches in MSA 25420 (Harrisburg-Carlisle, PA) during the evaluation period, two of which were in moderate-income census tracts.

The bank's hours and services were tailored to the convenience and needs of its assessment area, including LMI geographies or LMI individuals. Of the 25 branches in the MSA, 22, or 88.0%, have early morning, late evening hours, or Saturday hours. Of the 10 branches in LMI census tracts, eight or 80%, had extended or Saturday hours.

## Community Development Services

M&T provided a relatively high level of community development services in the MSA 25420 (Harrisburg-Carlisle, PA). As shown in the table to the right, M&T provided 15 services in the assessment area, which were primarily focused on mortgage education seminars. In addition, management and staff served as directors, advisors or committee members to 40 nonprofit and community based organizations in MSA 25420 (Harrisburg-Carlisle, PA).

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	11
Financial Literacy	2
Small Business Seminars	1
Technical Assistance	1
<b>Total</b>	<b>15</b>

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 42540 (SCRANTON—WILKES-BARRE, PA)

Located in northeastern Pennsylvania, MSA 42540 (Scranton—Wilkes-Barre, PA) is made up of Lackawanna, Luzerne, and Wyoming Counties. The MSA is a highly competitive marketplace where large regional banks compete with numerous community banks, savings and loan associations, credit unions, and nonbank financial institutions. M&T's primary competitors are PNC Bank, Wells Fargo Bank, N.A., First National Community Bank, and Community Bank, N.A.

As of December 31, 2013, M&T maintained 14 branches in the MSA. According to the FDIC, as of June 30, 2013, M&T ranks 3<sup>rd</sup> in MSA 42540 (Scranton—Wilkes-Barre, PA) with 9.0% of the retail deposit market share, and maintains 12.0% of all its retail branches in Pennsylvania. PNC Bank ranked 1<sup>st</sup> with roughly 24.0% of deposits, and Wells Fargo Bank ranked 2<sup>nd</sup> with roughly 10% of deposits. There are 23 depository institutions operating in the assessment area. These institutions maintain an aggregate of 227 banking offices, holding \$11.2 billion in deposits. M&T's branches hold approximately \$997 million in MSA 42540 (Scranton—Wilkes-Barre, PA) or 12.0% of the bank's deposits in Pennsylvania.

### Community Contacts

As part of the CRA evaluation process, one community contact was conducted with a private nonprofit regional provider of economic and community development services in seven counties in northeastern Pennsylvania. According to the contact, the area, formerly closely connected with the coal industry, has been struggling to reinvent itself after the decline of coal. It also suffers from an aging population. Healthcare and the wholesale distribution industry seem to be stabilizing the economy now. The contact indicated a need for increased small business lending and said that many banks participate with the organization in conducting workshops to help entrepreneurs establish a new business or expand an existing business.

### PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

Demographic Characteristics

According to the 2010 Census, the MSA has a population of approximately 563,631 and is estimated to have decreased slightly to 562,037, as of July 2013. MSA 42540 (Scranton—Wilkes-Barre, PA) has an aging population with 18.0% of MSA residents over the ages of 65, which reduces the demand for home purchase and refinance loans.

The assessment area has 170 census tracts, of which 2.0% are low-income tracts and 21.0% are moderate income tracts. A majority of the assessment area LMI tracts are located in Luzerne County in the cities of Wilkes-Barre, Hazelton, and Pittston, and in areas near Wilkes-Barre.

Income Characteristics

FFIEC-adjusted MFI figures for MSA 42540 (Scranton—Wilkes-Barre, PA) are listed in the table at right. The 2010 Census indicates that 38.0% of families in the MSA are designated as LMI. Families living below the poverty level represented 10% of the total families in the assessment area.

FFIEC MEDIAN FAMILY INCOMES		
Area	2012	2013
MSA 42540	\$58,900	\$59,200

Housing Characteristics

Of the 258,520 housing units in MSA 42540 (Scranton—Wilkes-Barre, PA), 61.0% are owner-occupied. In LMI tracts, the level of owner-occupancy is 15.0%. Approximately 12.0% of housing units in the MSA are vacant, which discourages lending for new housing construction.

The cost of housing in MSA 42540 (Scranton—Wilkes-Barre, PA) varies widely by county. As shown in the table to the right, according to Moody’s Economy, Wyoming has the highest median home prices in the MSA. Although the demographic profile shows that housing is more affordable in MSA 42540 (Scranton—Wilkes-Barre, PA), when compared to other eastern metropolitan areas, 40.0% of renters are paying 30.0% or more of income in gross rent, making it difficult for renters to afford to purchase a house.

MEDIAN HOME PRICE	
Area	2014
Lackawanna County	\$139,000
Luzerne County	\$119,900
Wyoming County	\$178,500

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 26,577 businesses in 2013, of which 88.0% were small businesses with GAR of \$1 million or less.

Scranton and nearby Wilkes-Barre are centers of government, higher education, health services, retailing and distribution in northeastern Pennsylvania. Strengths of MSA 42540 (Scranton—Wilkes-Barre, PA)’s economy include its position as a major distribution hub for the region, a comparatively low cost of living, and the large presence of education and healthcare facilities. In

addition, manufacturing employment is showing signs of stabilizing. However, a below average per capita income and a concentration of new jobs in comparatively low-paying industries and occupations limit the area's economic potential.

As shown in the table at right, unemployment in the MSA remained above the state average for both years in the evaluation period. Although decreasing, unemployment rates are the highest in Luzerne County at 9.3%.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 42540	9.5%	9.0%
Lackawanna County	9.0%	8.6%
Luzerne County	9.7%	9.3%
Wyoming County	9.7%	9.2%
State of Pennsylvania	7.9%	7.4%

Additional performance context data for this assessment area is provided in the MSA 42540 (Scranton—Wilkes-Barre, PA) Assessment Area Demographics table on the next page.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 42540</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	2.4	1,981	1.3	897	45.3	29,928	20.3
Moderate-income	35	20.6	25,182	17.1	4,462	17.7	26,520	18.0
Middle-income	101	59.4	87,754	59.6	7,502	8.5	31,872	21.7
Upper-income	29	17.1	32,213	21.9	1,286	4.0	58,810	40.0
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>170</b>	<b>100.0</b>	<b>147,130</b>	<b>100.0</b>	<b>14,147</b>	<b>9.6</b>	<b>147,130</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,752	1,062	0.7	18.5	3,704	64.4	986	17.1
Moderate-income	49,200	22,647	14.4	46.0	19,479	39.6	7,074	14.4
Middle-income	152,926	96,828	61.7	63.3	38,577	25.2	17,521	11.5
Upper-income	50,642	36,497	23.2	72.1	9,402	18.6	4,743	9.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>258,520</b>	<b>157,034</b>	<b>100.0</b>	<b>60.7</b>	<b>71,162</b>	<b>27.5</b>	<b>30,324</b>	<b>11.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,347	5.1	1,106	4.7	163	9.0	78	6.1
Moderate-income	4,134	15.6	3,663	15.6	259	14.3	212	16.4
Middle-income	15,428	58.1	13,612	58.0	1,051	58.1	765	59.3
Upper-income	5,643	21.2	5,083	21.6	326	18.0	234	18.2
Unknown-income	25	0.1	16	0.1	9	0.5	0	0.0
<b>Total Assessment Area</b>	<b>26,577</b>	<b>100.0</b>	<b>23,480</b>	<b>100.0</b>	<b>1,808</b>	<b>100.0</b>	<b>1,289</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>88.3</b>		<b>6.8</b>		<b>4.9</b>

Based on 2010 ACS Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 42540 (SCRANTON—WILKES-BARRE, PA)

### LENDING TEST

M&T's performance under the lending test in MSA 42540 (Scranton—Wilkes-Barre, PA) was good. This conclusion is based on adequate lending activity performance, good geographic and borrower distribution performance, and an adequate level of community development loans. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

## **Lending Activity**

M&T's lending levels in MSA 42540 (Scranton—Wilkes-Barre, PA) reflect adequate responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volumes in comparison to the prior evaluation, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was similar to the aggregate's lending activity.

M&T's market share of deposits in the assessment area and its market share of lending were stable, with the exception of home purchase lending, which increased and refinance lending, which decreased. In 2013, M&T had deposit market share of 9.0%, and lending market share of 4.0% in home purchase lending, 2.0% in refinance lending, 3.0% in home improvement lending, and 2.0% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 8.0%, and lending market share was 3.0% in home purchase lending, 3.0% in refinance lending, 4.0% in home improvement lending, and 2.0% in small business lending.

HMDA and small business volumes in the current evaluation period increased by 6.0% compared to the last evaluation. This increase was driven by an increase in home purchase (67.0%), which was offset by decreases in refinance (-8.0%), home improvement (-14.0%) and small business (-13.0%) loan volumes. Comparisons to the aggregate data for the evaluation period indicated overall similar lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was below the lending volume of similarly-situated banks.

## **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related lending was good while small business lending reflects adequate penetration in the MSA 42540 (Scranton—Wilkes-Barre, PA) assessment area. Lending penetration in LMI census tracts was excellent for home purchase and home improvement lending, and adequate for refinance and small business lending. Lending performance was primarily based on performance in moderate-income census tracts as opportunities for HMDA lending in low-income census tracts was limited as less than 1.0% of all owner-occupied housing units were located in low-income census tracts. This is confirmed by the performance of the aggregate which made less than 1.0% of its HMDA loans in low-income census tracts. M&T demonstrated overall low level of lending gaps. Lending gaps are considered minimal because between 2012 and 2013, there was a high level of penetration rates in low-, moderate-, middle-, and upper-income census tracts. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	4	1	75%
Moderate	35	5	86%
Middle	101	17	83%
Upper	29	3	90%
<b>2012</b>			
Low	4	1	75%
Moderate	35	5	86%
Middle	101	13	87%
Upper	29	3	90%

*Home Purchase*

M&T’s home purchase performance in LMI census tracts was considered excellent in light of demographic and performance context issues as challenges relating to housing affordability and the availability of owner-occupied housing units in low-income census tracts were prevalent. In 2013, M&T did not originate any home purchase loans in a low-income-census tract in this assessment area. Less than 1.0% of owner-occupied housing units were in low-income census tracts. This performance context issue is confirmed by the aggregate which made less than 1.0% of its home purchase loans by number and less than 1.0% by dollar volume in low-income census tracts.

M&T’s performance in moderate-income census tracts was excellent. In 2013, M&T originated 19.2% of its home purchase loans by number and 13.3% by dollar volume in moderate-income census tracts. This was above the demographics of the assessment area which indicates that 14.4% of owner-occupied housing units were located in moderate-income census tracts. M&T’s performance was also above the aggregate which made 12.2% of its home purchase loans by number and 7.4% by dollar volume in moderate-income census tracts. M&T’s performance in 2012 was comparable to its 2013 performance.

*Refinance*

M&T’s refinance performance in LMI census tracts was considered adequate in light of demographic and performance context issues as challenges relating to housing affordability and the availability of owner-occupied housing units in low-income census tracts were prevalent. In 2013, M&T did not originate any refinance loans in a low-income-census tract in this assessment area. Less than 1.0% of owner-occupied housing units were in low-income census tracts. This performance context issue is confirmed by the aggregate which made less than 1.0% of its refinance loans by number and less than 1.0% by dollar volume in low-income census tracts.

M&T’s performance in moderate-income census tracts was adequate. In 2013, M&T originated 7.7% of its refinance loans by number and 5.8% by dollar volume in moderate-income census

tracts. This was below the demographics of the assessment area which indicates 14.4% of owner-occupied housing units were in moderate-income census tracts. M&T's performance also was below the aggregate which made 9.8% of its refinance loans by number and 17.8% by dollar volume in moderate-income census tracts. M&T's performance in 2012 was below its 2013 performance.

### *Home Improvement*

M&T's home improvement performance in LMI census tracts was considered excellent in light of demographic and performance context issues as challenges relating to housing affordability and the availability of owner-occupied housing units in low-income census tracts were prevalent. In 2013, M&T originated one or 1.7% of its home improvement loans by number and less than 1.0% by dollar volume in a low-income census tract in this assessment area. Less than 1.0% of owner-occupied housing units were in low-income census tracts. This performance context issue is confirmed by the aggregate which made less than 1.0% of its home improvement loans by number and less than 1.0% by dollar volume in low-income census tracts.

M&T's performance in moderate-income census tracts was excellent. In 2013, M&T originated 15.0% of its home improvement loans by number and 5.5% by dollar volume in moderate-income census tracts. This was above the demographics of the assessment area which indicates 14.4% of owner-occupied housing units were in moderate-income census tracts. M&T's performance also was above the aggregate which made 11.7% of its home improvement loans by number and 8.8% by dollar volume in moderate-income census tracts. M&T's performance in 2012 was comparable to its 2013 performance.

### *Small Business*

The overall distribution of small business loans in LMI census tracts was adequate based on adequate performance in moderate-income tracts and good performance in low-income tracts. M&T's performance in low-income census tracts in MSA 42540 (Scranton—Wilkes-Barre, PA) was good. In 2013, M&T made 2.7% of its small business loans by number and 6.5% by dollar volume in low-income census tracts. This was below the demographic, which indicated 5.1% of business establishments were located in low-income census tracts. M&T's performance was below the aggregate which made 4.3% of its small business loans by number and 5.7% by dollar volume in low-income census tracts. M&T's performance in 2012 was comparable to its 2013 performance.

M&T's performance in moderate-income census tracts in MSA 42540 was adequate. In 2013, M&T made 11.6% of its small business loans by number and 10.7% by dollar volume in moderate-income census tracts. This was below the demographic, which indicated 15.6% of business establishments were located in moderate-income census tracts. M&T's performance was also below the aggregate which made 12.7% of its small business loans by number and



12.4% by dollar volume in moderate-income census tracts. M&T's performance in 2012 exceeded its 2013 performance.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 42540 (Scranton—Wilkes-Barre, PA) assessment area reflects good penetration. Overall, lending to low-income borrowers was good, lending to moderate-income borrowers was excellent and lending to small businesses was adequate.

#### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was excellent based on excellent performance with moderate-income borrowers and good performance with low-income borrowers. M&T's home purchase lending to low-income borrowers was good. M&T made 14.3% of its home purchase loans by number and 7.7% by dollar volume to low-income borrowers when 20.3% of families in the MSA assessment area are of low-income. Home purchase performance was above the performance of the aggregate which also made 9.1% of its home purchase loans by number and 4.5% by dollar volume to low-income borrowers. M&T's 2013 home purchase performance exceeded its 2012 performance.

Home purchase lending to moderate-income borrowers was excellent. M&T made 29.1% of its home purchase loans by number and 21.6% by dollar volume to moderate-income borrowers when 18.0% of families in the MSA assessment area are of moderate-income. Home purchase performance was above the aggregate which made 22.4% of its home purchase loans by number and 15.6% by dollar volume to moderate-income borrowers. M&T's 2012 home purchase performance was comparable to its 2013 performance.

#### *Refinance*

The overall distribution of refinance loans to LMI borrowers was adequate based on adequate performance with moderate-income borrowers and poor performance with low-income borrowers. Refinance lending to low-income borrowers was poor as 4.2% of refinance loans by number and 2.3% by dollar volume were to low-income borrowers compared to 20.3% of families in the MSA assessment area which are of low-income. Performance was below the aggregate which made 6.1% of its refinance loans by number and 2.1% by dollar volume to low-income borrowers. M&T's 2012 refinance performance was below its 2013 performance.

Refinance lending to moderate-income borrowers was adequate. M&T made 11.3% of its refinance loans by number and 8.5% by dollar volume to moderate-income borrowers when 18.0% of families in the MSA assessment area are of moderate-income. Refinance performance was below the aggregate which made 14.3% of its refinance loans by number and 6.0% by dollar

volume to moderate-income borrowers. M&T's 2012 refinance was similar to its 2013 performance.

### *Home Improvement*

The overall distribution of home improvement loans was excellent based on excellent performance with LMI borrowers. M&T's home improvement lending to low-income borrowers was excellent. M&T made 25.0% of its home improvement loans by number and 8.2% by dollar volume to low-income borrowers when 20.3% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 11.9% of its home improvement loans by number and 5.0% by dollar volume to low-income borrowers. Home improvement performance in 2012 was comparable to 2013's performance.

Home improvement lending to moderate-income borrowers was excellent. M&T made 28.3% of its home improvement loans by number and 13.1% by dollar volume to moderate-income borrowers when 18.0% of families in the MSA assessment area are of moderate-income. Home improvement performance was above the aggregate which made 20.4% of its home improvement loans by number and 12.6% by dollar volume to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent.

### *Small Business*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 56.2% of its small business loans by number and 38.7% by dollar volume to these businesses, compared to the 88.3% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 47.9% of its small business loans by number and 40.6% by dollar volume to businesses with GAR of \$1 million or less. The bank made 62.3% of its small business loans by number and 21.9% by dollar volume in amounts of \$100,000 or less, which was below the aggregate's 88.3% of small business loans by number and 30.7% by dollar volume in amounts of \$100,000 or less. Small business lending performance in 2012 was comparable to the bank's performance in 2013 in comparison to businesses with GAR of \$1 million or less as performance was below the demographic. The percentage of lending in amounts of \$100,000 or less was also below the aggregate's performance.

### Community Development Lending

As shown in the table to the right, M&T made an adequate level of community development loans in MSA 42540 (Scranton—Wilkes-Barre, PA) with three community development loans totaling \$27.1 million, or 12.0% of the bank’s community development lending in Pennsylvania. M&T ranked 1<sup>st</sup> out of seven similarly-situated banks when comparing annualized community development loans to deposits within MSA 42540 (Scranton—Wilkes-Barre, PA). New commitments however, represented 43.0% of all community development lending activity.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Economic Development	1	\$9,672
Revitalize and Stabilize	2	\$17,477
<b>Total</b>	<b>3</b>	<b>\$27,149</b>

Community development lending supporting economic development initiatives represented 36.0% of total community development lending for MSA 42540 (Scranton—Wilkes-Barre, PA) while loans supporting revitalization and stabilization were 64.0% of total community development lending activity for MSA 42540 (Scranton—Wilkes-Barre, PA).

An example of a community development initiative includes but is not limited to the following:

- An \$11.5 million commercial mortgage for a new hotel and conference center constructed in downtown Scranton in a low-income area.

### INVESTMENT TEST

As shown in the table to the right, M&T made an excellent level of community development investments and grants in MSA 42540 (Scranton—Wilkes-Barre, PA), with \$17.2 million in total qualified investments and grants. Total qualified investments made in MSA 42540 (Scranton—Wilkes-Barre, PA) accounted for 26.0% of total qualified investments made in the State of Pennsylvania. Of the assessment area investments, 96.0% were new investments made in the current evaluation period. M&T's level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	10	\$16,782
Community Services	55	\$414
Economic Development	2	\$2
Revitalize & Stabilize	2	\$1
<b>Total</b>	<b>69</b>	<b>\$17,199</b>

M&T made extensive use of complex investments to support community development initiatives, with 93.0% of assessment area investments made in LIHTC projects. M&T also exhibited good responsiveness to the credit and community development needs of the assessment area. Of the assessment area investments, \$750,000 or 4.0% were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more

direct investments. The following are examples of qualified investments that met critical needs in the assessment area:

- A \$12 million LIHTC investment to support the construction of 76 units of affordable housing in Lackawanna County.
- Multiple grants totaling \$422,000 to organizations that support various community development activities throughout this assessment area.

## **SERVICE TEST**

M&T's performance under the service test in MSA 42540 (Scranton—Wilkes-Barre, PA) was good. M&T's delivery systems were accessible, alternative delivery systems did not enhance the bank's performance, changes in branch locations did adversely affect the accessibility of the bank's delivery systems, and the bank's hours and services were tailored to the convenience and needs of the assessment area. M&T also was a leader in providing community development services in the assessment area.

### **Retail Services**

M&T's delivery systems were accessible to geographies and individuals of different income levels in this assessment area. M&T operated 14 branches in this assessment area. Two (14.0%) of the branches were in low-income areas, in comparison to 2.0% of the MSA's population residing in low-income areas. There were no branches in moderate-income census tracts, where 18.0% of the population resides.

Alternative delivery systems did not enhance the bank's performance in this assessment area. M&T had 10 off-site ATM locations in the assessment area; however, none were located in LMI areas.

Changes in branch locations generally did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T closed three branches in MSA 42540 (Scranton—Wilkes-Barre, PA). One of the closed branches was in a moderate-income census tract.

The bank's hours and services were tailored to the convenience and needs of the assessment area, including LMI geographies or LMI individuals. Of the 14 branches in the MSA, 13, or 93.0%, have early morning, late evening, or Saturday hours. Of the two branches located in LMI census tracts, one had extended or Saturday hours.

### **Community Development Services**

M&T was a leader in providing community development services in the MSA 42540 (Scranton—Wilkes-Barre, PA) assessment area. M&T performed a total of 65 community

development services, all of which were mortgage education seminars. In addition, bank representatives participated as board or committee members of 14 nonprofit or community based organizations in the MSA 42540 (Scranton—Wilkes-Barre, PA) assessment area.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN PA NONMETROPOLITAN AREA GROUP A (BRADFORD, COLUMBIA, MONTOUR, NORTHUMBERLAND, SCHUYLKILL, SNYDER, SULLIVAN, AND UNION COUNTIES)

The PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area is made up of eight contiguous counties located in central Pennsylvania. The area is a moderately competitive marketplace where a few super-regional banks compete with community banks, savings banks, and nonbank financial institutions. M&T's primary competitors are Susquehanna Bank, Sovereign Bank, Wells Fargo Bank, and First Columbia Bank and Trust.

As of December 31, 2013, M&T maintained 27 branches in the assessment area, or 17.0% of its retail branches in Pennsylvania. As of June 30, 2013, these branches held approximately \$903 million, or 11.0%, of the bank's deposits in Pennsylvania. M&T ranked 1<sup>st</sup> in the assessment area with 13.0% of the deposit market share.

#### Community Contacts

One community contact was conducted with an economic development corporation that serves the region. The region suffers from a declining and aging population. The contact indicated a need for additional loan resources to help stimulate private investment.

#### PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

#### Demographic Characteristics

The PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area is mainly a rural area of Pennsylvania, with large portions of the land in Union, Snyder, and Sullivan Counties designated as state forest land. The Susquehanna River flows through the center of the assessment area, and collectively Northumberland, Snyder, and Union Counties are considered the Susquehanna Valley. This assessment area has a population of 482,078, and based on 2013 Census data population estimates, the three Valley counties contain 37.0% of the population.

The largest county in terms of population is Schuylkill County, where 31.0% of the assessment area's population resides. There are 117 census tracts in this assessment area, of which 17 tracts,

or 15.0%, are LMI tracts. LMI census tracts are concentrated in Schuylkill, Northumberland, and Columbia counties, while Montour, Bradford, Sullivan, Snyder, and Union Counties contain no LMI tracts. In addition, Sullivan County is considered to be an underserved nonmetropolitan area.

Income Characteristics

According to the FFIEC, the various counties of the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area had slight decreases in MFI, as shown in the table to the right. The 2010 Census indicates that 39.0% of families in M&T’s PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area are designated as LMI, and 8.0% of assessment area families live below the poverty level.

<b>FFIEC MEDIAN FAMILY INCOMES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
Bradford County	\$51,300	\$53,300
Columbia County	\$56,200	\$57,800
Montour County	\$62,600	\$60,600
Northumberland County	\$51,800	\$51,100
Schuylkill County	\$55,700	\$52,800
Snyder County	\$55,500	\$55,000
Sullivan County	\$51,100	\$51,200
Union County	\$58,300	\$56,000

Housing Characteristics

The 2010 Census revealed that 64.0% of housing units in these nonmetropolitan area counties are owner-occupied. As noted in the table to the right, average home prices in the region vary widely. Central Pennsylvania, like much of the rest of the state, has avoided the worst of the housing crisis. Generally, the home prices and relatively high levels of MFI make this region generally affordable.

<b>MEDIAN HOME PRICE</b>	
<b>Area</b>	<b>2014</b>
Bradford County	\$154,900
Columbia County	\$142,500
Montour County	\$175,000
Northumberland County	\$100,000
Schuylkill County	\$84,500
Snyder County	\$169,000
Sullivan County	\$175,000
Union County	\$187,000

Affordable rental housing has become a pressing need in the area as drilling companies bring experienced workers into the area. The influx of new workers and new money has driven up prices and exhausted the existing supply of homes, apartments, and hotel rooms. Although this has been good for local residential property owners (rents have risen and vacancy rates are down), local wages have not kept pace with the new market. Many low-wage workers are being priced out of the rental market.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 19,561 businesses in 2013, of which 89.0% were small businesses with GAR of \$1 million or less.

As shown in the table to the right, unemployment rates decreased during the evaluation period in each of the assessment area's counties, except in Bradford County and Sullivan County. In 2013, Montour County had the lowest unemployment rate in the assessment area at 5.5%, mainly due to job gains from the gas industry. Schuylkill County had the highest unemployment rate at 8.8%.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
Bradford County	6.5%	6.9%
Columbia County	8.0%	7.1%
Montour County	5.9%	5.5%
Northumberland County	9.0%	8.5%
Schuylkill County	9.3%	8.8%
Snyder County	8.1%	7.4%
Sullivan County	7.4%	7.7%
Union County	7.7%	7.5%
State of Pennsylvania	7.9%	7.4%

Natural gas exploration and extraction companies expanded steadily throughout the region and companies have applied for hundreds of well permits in Bradford, Sullivan, Columbia, and other counties in the Marcellus Shale Region. Job creation based on the amount of drilling taking place, land leasing, and tax revenue generation resulting from the drilling has improved the area's economic outlook. The main beneficiary of the increased well activity has been the hospitality industry.

Additional performance context data for this assessment area is provided in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) Assessment Area Demographics table on the next page.



<b>Assessment Area Demographics</b>								
<b>Assessment Area: PA Non-MSA Group A</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	0.9	148	0.1	83	56.1	23,466	18.5
Moderate-income	16	13.7	13,929	11.0	2,208	15.9	25,777	20.4
Middle-income	87	74.4	99,049	78.2	7,791	7.9	29,376	23.2
Upper-income	10	8.5	13,513	10.7	598	4.4	48,047	37.9
Unknown-income	3	2.6	27	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>117</b>	<b>100.0</b>	<b>126,666</b>	<b>100.0</b>	<b>10,680</b>	<b>8.4</b>	<b>126,666</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	168	10	0.0	6.0	158	94.0	0	0.0
Moderate-income	29,398	14,857	10.5	50.5	9,379	31.9	5,162	17.6
Middle-income	171,097	111,193	78.7	65.0	35,602	20.8	24,302	14.2
Upper-income	19,478	15,225	10.8	78.2	2,839	14.6	1,414	7.3
Unknown-income	30	9	0.0	30.0	21	70.0	0	0.0
<b>Total Assessment Area</b>	<b>220,171</b>	<b>141,294</b>	<b>100.0</b>	<b>64.2</b>	<b>47,999</b>	<b>21.8</b>	<b>30,878</b>	<b>14.0</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	7	0.0	6	0.0	1	0.1	0	0.0
Moderate-income	2,446	12.5	2,141	12.3	155	13.5	150	14.3
Middle-income	14,798	75.7	13,139	75.7	849	73.8	810	77.1
Upper-income	2,299	11.8	2,065	11.9	145	12.6	89	8.5
Unknown-income	11	0.1	8	0.0	1	0.1	2	0.2
<b>Total Assessment Area</b>	<b>19,561</b>	<b>100.0</b>	<b>17,359</b>	<b>100.0</b>	<b>1,151</b>	<b>100.0</b>	<b>1,051</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.7</b>		<b>5.9</b>		<b>5.4</b>

Based on 2010 ACS Information.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PA NONMETROPOLITAN AREA GROUP A (BRADFORD, COLUMBIA, MONTOUR, NORTHUMBERLAND, SCHUYLKILL, SNYDER, SULLIVAN, AND UNION COUNTIES)**

**LENDING TEST**

M&T's performance under the lending test in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties)

assessment area was adequate. This conclusion is based on adequate lending activity performance, good geographic and borrower distribution performance, and an adequate level of community development loans. Some of the data used to evaluate M&T's performance in this assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area reflect adequate responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volumes in the current evaluation in comparison to the prior evaluation period, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was below the aggregate's lending activity.

M&T's market share of deposits in the assessment area and its market share of lending were stable, with the exception of refinance lending and small business lending, which decreased. In 2013, M&T had deposit market share of 13.0%, and lending market share of 3.0% in home purchase lending, 3.0% in refinance lending, 9.0% in home improvement lending, and 4.0% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 12.0%, and lending market share was 3.0% in home purchase lending, 4.0% in refinance lending, 8.0% in home improvement lending, and 6.0% in small business lending.

HMDA and small business volumes in the current evaluation period decreased by 4.0% compared to the last evaluation. This decrease was driven by decreases in refinance (-12.0%) and small business (-4.0%) loan volumes, partially offset by increased home purchase (4.0%) and home improvement (0.48%) loan volumes. Comparisons to the aggregate data for the evaluation period indicated overall decreased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was below the lending volume of similarly-situated banks.

### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area. Lending penetration in LMI geographies was excellent for home purchase, home improvement, and small business lending, and poor for refinance lending. This conclusion was primarily based on M&T's performance in moderate-income census tracts, as opportunities to lend in the one low-income census tract of the assessment area were very limited. M&T demonstrated overall low level of lending gaps. Lending gaps are considered minimal because between 2012 and 2013, there was a high level of penetration rates in moderate-, middle-, and upper-income census tracts. As previously mentioned, there was a low level of penetration in low-income census tracts

because opportunities to lend in the one low-income census tract were very limited. The table below details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	1	1	0%
Moderate	16	3	81%
Middle	87	7	92%
Upper	10	0	100%
<b>2012</b>			
Low	1	1	0%
Moderate	16	1	94%
Middle	87	8	91%
Upper	10	0	100%

#### *Home Purchase*

M&T's performance in moderate-income census tracts was excellent. In 2013, M&T originated 14.3% of its home purchase loans by number and 7.5% by dollar volume in moderate-income census tracts, which was above the demographics of the assessment area which indicates that 10.5% of owner-occupied housing units were located in moderate-income census tracts. M&T's performance was also above the aggregate which made 8.5% of its home purchase loans by number and 4.5% by dollar volume in moderate-income census tracts. M&T's performance in 2012 was comparable to its 2013 performance.

#### *Refinance*

M&T's performance in moderate-income census tracts was poor. In 2013, M&T originated 3.1% (4 loans) of its refinance loans by number and 1.6% by dollar volume in moderate-income census tracts, which was below the demographics of the assessment area which indicates 10.5% of owner-occupied housing units were located in moderate-income census tracts. M&T's performance was also below the aggregate which made 4.8% of its home purchase loans by number and 6.7% by dollar volume in moderate-income census tracts. M&T's performance in 2012 was comparable to its 2013 performance.

#### *Home Improvement*

M&T's performance in moderate-income census tracts was excellent. In 2013, M&T originated 13.9% of its home improvement loans by number and 6.5% by dollar volume in moderate-income census tracts, which was above the demographics of the assessment area which indicates that 10.5% of owner-occupied housing units were located in moderate-income census tracts. M&T's performance also was above the performance of the aggregate which made 8.3% of its

home improvement loans by number and 4.3% by dollar volume in moderate-income census tracts. M&T's performance in 2012 was comparable to its 2013 performance.

### *Small Business*

M&T's performance in moderate-income census tracts was excellent. In 2013, M&T originated 14.4% of its small business loans by number and 12.8% by dollar volume in moderate-income census tracts, which was above the aggregate's performance of 10.2% of small business loans by number and 10.3% by dollar volume in moderate-income census tracts. Small business lending exceeded the demographics, which indicated that 12.5% of businesses were located in moderate-income census tracts. Small business lending in 2012 was less favorable than 2013.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area reflects good penetration. Overall, lending to LMI borrowers was good and lending to small businesses was adequate.

### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was good based on good performance with moderate-income borrowers and adequate performance with low-income borrowers. M&T's home purchase lending to low-income borrowers was adequate. M&T made 9.5% of its home purchase loans by number and 4.0% by dollar volume to low-income borrowers when 18.5% of families in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area are of low-income. Home purchase performance was above the performance of the aggregate which made 5.9% of its home purchase loans by number and 2.8% by dollar volume to low-income borrowers. M&T's 2013 home purchase performance exceeded its 2012 performance.

Home purchase lending to moderate-income borrowers was good. M&T made 21.0% of its home purchase loans by number and 16.0% by dollar volume to moderate-income borrowers when 20.4% of families in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area are of moderate-income. Home purchase performance was below the aggregate which made 22.7% of its home purchase loans by number and 15.9% by dollar volume to moderate-income borrowers. M&T's 2012 home purchase performance was comparable to its 2013 performance.

### *Refinance*

The overall distribution of refinance loans was poor based on poor performance with LMI borrowers. Refinance lending to low-income borrowers was poor as M&T made 1.6% of refinance loans (2 loans) by number and 0.7% by dollar volume to low-income borrowers compared to 18.5% of families in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area which are of low-income. Performance was below the aggregate which made 4.7% of its refinance loans by number and 1.7% by dollar volume to low-income borrowers. M&T's 2012 refinance performance was comparable to its 2013 performance.

Refinance lending to moderate-income borrowers was poor. M&T made 7.9% of its refinance loans by number and 5.9% by dollar volume to moderate-income borrowers when 20.4% of families in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area are of moderate-income. Refinance performance was below the aggregate which made 14.9% of its refinance loans by number and 6.3% by dollar volume to moderate-income borrowers. M&T's 2012 refinance was similar to its 2013 performance.

### *Home Improvement*

The overall distribution of home improvement loans was excellent based on excellent performance with LMI borrowers. M&T's home improvement lending to low-income borrowers was excellent. M&T made 19.8% of its home improvement loans by number and 7.2% by dollar volume to low-income borrowers when 18.5% of families in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 8.2% of its home improvement loans by number and 3.4% by dollar volume to low-income borrowers. Home improvement performance in 2012 was comparable to 2013's performance.

Home improvement lending to moderate-income borrowers was excellent. M&T made 23.8% of its home improvement loans by number and 18.5% by dollar volume to moderate-income borrowers when 20.4% of families in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area are of moderate-income. Home improvement performance was above the aggregate which made 18.9% of its home improvement loans by number and 10.2% by dollar volume to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent.

*Small Business*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 55.8% of its small business loans by number and 33.4% by dollar volume to these businesses, compared to the 88.7% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 42.5% of its small business loans by number and 41.2% by dollar volume to businesses with GAR of \$1 million or less. The bank made 58.6% of its small business loans by number and 14.7% by dollar volume in amounts of \$100,000 or less, which was below the aggregate’s 91.1% of small business loans by number and 29.5% by dollar volume in amounts of \$100,000 or less. Small business lending performance in 2012 was comparable to the bank’s performance in 2013 in comparison to businesses with GAR of \$1 million or less as performance was below the demographic. The percentage of lending in amounts of \$100,000 or less was also below the aggregate’s performance.

**Community Development Lending**

M&T’s community development lending performance in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area demonstrates adequate responsiveness to the community development needs of the assessment area, considering the need and availability of such opportunities for community development in the assessment area. Community development lending consisted of one \$800,000 loan to an economic development entity that supports small business development and job creation. Community development lending was below the last evaluation when three loans totaling \$19 million in community development loans were reported.

**INVESTMENT TEST**

As shown in the table to the right, M&T made an adequate level of qualified community development investments and grants in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area, with \$5.3 million of qualified investments dedicated to activities inside the assessment area. Total qualified investments made in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area accounted for 8.0% of total qualified investments made in the State of Pennsylvania. Of the assessment area investments, 5.0%, or \$292,000, were new investments made in the current evaluation period. M&T’s level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	11	\$5,036
Community Services	70	\$274
Economic Development	3	\$3
<b>Total</b>	<b>84</b>	<b>\$5,313</b>

M&T made extensive use of complex investments to support community development initiatives, with 92.0% of assessment area investments made in LIHTC projects. M&T also exhibited excellent responsiveness to the credit and community development needs of the assessment area, as the assessment area investments primarily supported affordable housing initiatives. Of the assessment area investments, \$117,000 or 2.0% were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments.

Qualified investments also included multiple grants totaling \$292,000 to organizations that support affordable housing, community services, and economic development to LMI individuals throughout this assessment area.

## **SERVICE TEST**

M&T's performance under the service test in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area in central Pennsylvania was excellent. M&T's delivery systems were readily accessible, and slightly enhanced the bank's performance. Changes in branch location did not adversely affect the accessibility of the bank's delivery systems, and the bank's hours and services were tailored to the convenience and needs of the assessment area. M&T also provided a relatively high level of community development services.

### **Retail Services**

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated 27 branches in this assessment area. Six (22.0%) of the total branches were in moderate-income areas, which compares favorably to 11.0% of the MSA's population residing in moderate-income areas.

Alternative delivery systems slightly enhanced the bank's performance in this PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area group. M&T had 18 off-site ATM locations in the assessment area, of which one, or 6.0%, was located in a moderate-income area.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T closed one branch in this assessment area, which was not located in an LMI tract. M&T did not open any new branches in this PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area group during the evaluation period.

The bank's hours and services were tailored to the convenience and needs of the assessment area, including LMI geographies or LMI individuals. Of the 26 branches in PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and

Union Counties), 25, or 96.0%, have early morning, late evening hours, or Saturday hours. Six of the branches with extended hours are located in LMI areas.

### Community Development Services

As shown in the table to the right, M&T provided a relatively high level of community development services in this PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area. Management and staff served as directors, advisors or committee members to 39 nonprofit and community based organizations in the PA Nonmetropolitan area Group A (Bradford, Columbia, Montour, Northumberland, Schuylkill, Snyder, Sullivan, and Union Counties) assessment area. In addition, the bank provided eight services during the evaluation period, as shown in the table to the right.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	5
Financial Literacy	1
Small Business Seminars	1
Technical Assistance Seminars	1
<b>Total</b>	<b>8</b>



## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 11020 (ALTOONA, PA)

As of December 31, 2013, M&T operated nine branches in MSA 11020 (Altoona, PA), representing 6.0% of its branches in Pennsylvania. Based on deposits reported to the FDIC, as of June 30, 2013, these branches contained approximately \$781 million in deposits, or 9.0% of the bank's total branch deposits in the state. M&T ranked 1<sup>st</sup> in MSA 11020 (Altoona, PA) with 35.0% of the retail deposit market share.

There are 12 banks operating branches in MSA 11020 (Altoona, PA), which are primarily community banks. M&T's primary competitors in the assessment area are First National Bank of Pennsylvania, First Commonwealth Bank, and Citizens Bank of PA.

### Community Contacts

A community contact was conducted with a private nonprofit development corporation whose mission is to serve as a catalyst for economic, community and workforce development. The contact noted that a limited number of banks service the area but participation by the areas financial institutions is good. The contact also noted that smaller banks are more aggressive in seeking to participate with the agency in its financial arrangements.

### PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

### Demographic Characteristics

The assessment area encompasses Blair County, located in the Allegheny Mountains in central Pennsylvania. According to the 2010 Census, MSA 11020 (Altoona, PA)'s population is approximately 127,000 and is estimated to have slightly decreased to 126,000 as of July 2013. Although the population of both the city and county has remained fairly stable, a relatively high proportion of residents are senior citizens, with 18.0% and 16.0% of Blair County and the City of Altoona's population over the age of 65, respectively. The high proportion of seniors reduces demand for home purchase loans and refinances, as their mortgage lending needs are limited.

MSA 11020 (Altoona, PA) contains five moderate-income tracts and one low-income tract. The City of Altoona is Blair County's urban center and contains 36.0% of the county population. The city is a designated Enterprise Zone. Funds allocated for Enterprise Zone-related programs

are earmarked to build and rehabilitate housing in depressed neighborhoods. Tax incentives and financing programs encourage businesses to locate to Enterprise Zone areas.

Income Characteristics

FFIEC-adjusted MFI figures for MSA 11020 (Altoona, PA) are noted in the table to the right. The MFIs are the lowest of the MSA areas in Pennsylvania under full review.

FFIEC MEDIAN FAMILY INCOMES		
Area	2012	2013
MSA 11020	\$55,600	\$56,800

The 2010 Census indicates that 38.0% of families in the MSA are designated as LMI. Families living below the poverty level represented 9.0% of the total families in the assessment area.

Housing Characteristics

With negligible foreclosure activity and relatively stable housing prices, the housing market is poised for growth in 2014. Of the 56,241 housing units in MSA 11020 (Altoona, PA), 67.0% are owner-occupied. Only 9.0% of all owner-occupied units are located in the LMI census tracts. One-to-four family units comprised 91.0% of the housing units, while five or more family units comprised 9.0%. The median rent is approximately \$557; however, close to 44.0% of renters pay more than 30.0% of their income for rent. Thus, housing affordability is a significant issue for some lower income residents.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 5,408 businesses in 2013, of which 88.0% were small businesses with GAR of \$1 million or less.

MSA 11020 (Altoona, PA)'s transition to a service economy has been slow. Although 12.0% of residents are still employed in manufacturing, that sector continues to lose jobs. The decreasing and aging population and a lack of highly skilled labor have hampered the area's growth. However, the positive is that the education/healthcare sector continues to expand with over 12,000 employees. With a population comprising close to 16.0% senior citizens, this industry has become an important part of the economy. At present it provides 20.0% of total employment in the MSA. The largest employment sector is trade, transportation & utilities with roughly 15,200 employees or 25.0% of total employment in the MSA.

As shown in the table to the right, unemployment rates in MSA 11020 (Altoona, PA) decreased during the evaluation period and remains below the state average.

AVERAGE ANNUAL UNEMPLOYMENT RATES		
Area	2012	2013
MSA 11020	7.2%	6.7%
State of Pennsylvania	7.9%	7.4%

Additional performance context data for this assessment area is provided in the MSA 11020 (Altoona, PA) Assessment Area Demographics table below.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 11020</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.9	195	0.6	64	32.8	6,600	19.4
Moderate-income	5	14.7	3,822	11.2	892	23.3	6,224	18.3
Middle-income	25	73.5	26,429	77.6	2,012	7.6	7,848	23.0
Upper-income	3	8.8	3,614	10.6	190	5.3	13,388	39.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>34</b>	<b>100.0</b>	<b>34,060</b>	<b>100.0</b>	<b>3,158</b>	<b>9.3</b>	<b>34,060</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	1,148	131	0.3	11.4	929	80.9	88	7.7
Moderate-income	6,952	3,378	9.0	48.6	2,543	36.6	1,031	14.8
Middle-income	42,394	29,921	79.4	70.6	9,429	22.2	3,044	7.2
Upper-income	5,747	4,256	11.3	74.1	1,064	18.5	427	7.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>56,241</b>	<b>37,686</b>	<b>100.0</b>	<b>67.0</b>	<b>13,965</b>	<b>24.8</b>	<b>4,590</b>	<b>8.2</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	
Low-income	177	3.3	141	2.9	26	6.1	10	5.0
Moderate-income	665	12.3	592	12.4	51	11.9	22	11.0
Middle-income	3,886	71.9	3,451	72.2	290	67.9	145	72.5
Upper-income	680	12.6	597	12.5	60	14.1	23	11.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>5,408</b>	<b>100.0</b>	<b>4,781</b>	<b>100.0</b>	<b>427</b>	<b>100.0</b>	<b>200</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.4</b>		<b>7.9</b>		<b>3.7</b>

Based on 2010 ACS Information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 11020 (ALTOONA, PA)**

### **LENDING TEST**

M&T's performance under the lending test in MSA 11020 (Altoona, PA) was adequate. This conclusion is based on adequate lending activity performance and geographic distribution, good borrower distribution performance, and an adequate level of community development loans. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

#### **Lending Activity**

M&T's lending levels in the MSA 11020 (Altoona, PA) reflect adequate responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volumes in the current evaluation period in comparison to the prior evaluation period, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending activity was below the aggregate's lending activity.

M&T's market share of deposits in the assessment area and its market share of lending was stable, with the exception of home purchase and refinance lending, which decreased. In 2013, M&T had deposit market share of 35.0%, and lending market share of 4.0% in home purchase lending, 3.0% in refinance lending, 9.0% in home improvement lending, and 11.0% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 34.0%, and lending market share was 5.0% in home purchase lending, 6.0% in refinance lending, 10.0% in home improvement lending, and 11.0% in small business lending.

HMDA and small business volumes in the current evaluation period decreased by 5.0% compared to the last evaluation. This decrease was driven by decreases in home purchase (-19.0%) and refinance (-21.0%) loan volumes, partially offset by increased home improvement (6.0%) and small business (7.0%) loan volumes. Comparisons to the aggregate data for the evaluation period indicated overall decreased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T performance was consistent with the lending volume of similarly-situated banks.

#### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflects adequate penetration in the MSA 11020 (Altoona, PA) assessment area. Lending penetration in LMI census tracts was adequate for home purchase lending, poor for refinance and home improvement lending, and excellent for small business lending. This conclusion was primarily based on M&T's performance in moderate-income census tracts as opportunities for HMDA

lending in the one low-income census tract of the assessment area were very limited as less than 1.0% of owner-occupied housing units were located in this tract. Small business performance was evaluated as 3.3% of business establishments were located in the low-income census tract. M&T demonstrated overall low level of lending gaps. Lending gaps are considered minimal because between 2012 and 2013, there was a high level of penetration rates in low-, moderate-, middle-, and upper-income census tracts. The table below details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	1	0	100%
Moderate	5	0	100%
Middle	25	1	96%
Upper	3	0	100%
<b>2012</b>			
Low	1	0	100%
Moderate	5	0	100%
Middle	25	0	100%
Upper	3	0	100%

*Home Purchase*

M&T's performance in moderate-income census tracts was adequate. In 2013, M&T originated 6.1% of its home purchase loans by number and 2.5% by dollar volume in moderate-income census tracts, which was below the demographics of the assessment area which indicates 9.0% of owner-occupied housing units were located in moderate-income census tracts. M&T's performance was also below the aggregate which made 8.2% of its home purchase loans by number and 4.4% by dollar volume in moderate-income census tracts. M&T's performance in 2012 exceeded its 2013 performance.

*Refinance*

M&T's performance in moderate-income census tracts was poor. In 2013, M&T originated 1.8% (1 loan) of refinance loans by number and 0.5% by dollar volume in moderate-income census tracts, which was below the demographics of the assessment area which indicates 9.0% of owner-occupied housing units were located in moderate-income census tracts. M&T's performance also was below the aggregate which made 5.4% of its home purchase loans by number and 1.2% by dollar volume in moderate-income census tracts. M&T's performance in 2012 exceeded its 2013 performance.

### *Home Improvement*

M&T's performance in moderate-income census tracts was poor. In 2013, M&T originated 3.7% (2 loans) of its home improvement loans by number and 0.9% by dollar volume in moderate-income census tracts, which was below the demographics of the assessment area which indicates 9.0% of owner-occupied housing units were located in moderate-income census tracts. M&T's performance was below the aggregate which made 6.9% of its home improvement loans by number and 4.8% by dollar volume in moderate-income census tracts. M&T's performance in 2012 was comparable to its 2013 performance.

### *Small Business*

The overall distribution of small business loans in LMI tracts was excellent based on excellent performance in moderate-income tracts and good performance in low-income tracts. M&T's performance in low-income census tracts in MSA 11020 (Altoona, PA) was good. In 2013, M&T originated 5.5% of its small business loans by number and 5.5% by dollar volume in the low-income census tract, which was above the aggregate's performance of 3.1% of small business loans by number and 3.6% by dollar volume in the low-income census tract. Small business lending exceeded the demographics, which indicated 3.3% of businesses are located in the low-income census tract. M&T's 2012 small business lending performance was below its 2013 performance.

M&T's performance in moderate-income census tracts in MSA 11020 (Altoona, PA) was excellent. In 2013, M&T made 12.7% of its small business loans by number and 6.6% by dollar volume in moderate-income census tracts, which was above the demographic, which indicated 12.3% of business establishments were located in moderate-income census tracts. M&T's performance was above the aggregate which made 10.4% of its small business loans by number and 5.2% by dollar volume in moderate-income census tracts. M&T's performance in 2012 was comparable to its 2013 performance.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 11020 (Altoona, PA) assessment area reflects good penetration. Overall, lending to low-income borrowers and small businesses was adequate while lending to moderate-income borrowers was excellent.

### *Home Purchase*

The overall distribution of home purchase loans to LMI borrowers was good based on excellent performance with moderate-income borrowers and poor performance with low-income borrowers. M&T's home purchase lending to low-income borrowers was poor. M&T made 6.1% of its home purchase loans (3 loans) by number and 2.2% by dollar volume to low-income

borrowers when 19.4% of families in the MSA assessment area are of low-income. Home purchase performance was below the performance of the aggregate which made 10.0% of its home purchase loans by number and 5.6% by dollar volume to low-income borrowers. M&T's 2013 home purchase performance exceeded its 2012 performance.

Home purchase lending to moderate-income borrowers was excellent. M&T made 22.4% of its home purchase loans by number and 13.8% by dollar volume to moderate-income borrowers when 18.3% of families in the MSA assessment area are of moderate-income. Home purchase performance was similar to the aggregate which made 22.4% of its home purchase loans by number and 16.3% by dollar volume to moderate-income borrowers. M&T's 2012 home purchase performance was comparable to its 2013 performance.

### *Refinance*

The overall distribution of refinance loans to LMI borrowers was good based on excellent performance with moderate-income borrowers and adequate performance with low-income borrowers. Refinance lending to low-income borrowers was adequate as 7.3% of refinance loans by number and 3.1% by dollar volume were to low-income borrowers compared to 19.4% of families in the MSA assessment area which are of low-income. Performance was similar to the aggregate which made 7.0% of its refinance loans by number and 1.4% by dollar volume to low-income borrowers. M&T's 2012 refinance performance was comparable to its 2013 performance.

Refinance lending to moderate-income borrowers was excellent. M&T made 20.0% of its refinance loans by number and 11.8% by dollar volume to moderate-income borrowers when 18.3% of families in the MSA assessment area are of moderate-income. Refinance performance was above the aggregate which made 15.3% of its refinance loans by number and 4.2% by dollar volume to moderate-income borrowers. M&T's 2012 refinance was below its 2013 performance.

### *Home Improvement*

The overall distribution of home improvement loans was excellent based on excellent performance with LMI borrowers. M&T's home improvement lending to low-income borrowers was excellent. M&T made 25.9% of its home improvement loans by number and 5.4% by dollar volume to low-income borrowers when 19.4% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 14.4% of its home improvement loans by number and 5.0% by dollar volume to low-income borrowers. Home improvement performance in 2012 was comparable to 2013's performance.

Home improvement lending to moderate-income borrowers was excellent. M&T made 27.8% of its home improvement loans by number and 6.2% by dollar volume to moderate-income borrowers when 18.3% of families in the MSA assessment area are of moderate-income. Home improvement performance was above the aggregate which made 20.8% of its home improvement loans by number and 14.6% by dollar volume to moderate-income borrowers. M&T's 2012 home improvement performance was also excellent.

*Small Business*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 55.2% of its small business loans by number and 48.9% by dollar volume to these businesses, compared to the 88.4% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 40.1% of its small business loans by number and 44.4% by dollar volume to businesses with GAR of \$1 million or less. The bank made 54.5% of its small business loans by number and 15.4% by dollar volume in amounts of \$100,000 or less, which was below the aggregate's 82.9% of small business loans by number and 19.7% by dollar volume in amounts of \$100,000 or less. Small business lending performance in 2012 was comparable to the bank's performance in 2013 in comparison to businesses with GAR of \$1 million or less as performance was below the demographic. The percentage of lending in amounts of \$100,000 or less was also below the aggregate's performance.

**Community Development Lending**

As shown in the table to the right, M&T's community development lending performance in MSA 11020 (Altoona, PA) demonstrates adequate responsiveness to the community development needs of the assessment area, considering the need and availability of such opportunities for community development in the assessment area. Community development lending consisted of four loans totaling \$24.2 million that primarily targeted economic development (93.0%). New commitments however, represented 48.0% of all community development lending activity. An example of a community development initiative in this assessment area included a \$10 million letter of credit supporting economic development bonds issued by Blair County's economic development authority supporting a new distribution center constructed in a State of Pennsylvania Keystone Opportunity Zone.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$( '000s)</b>
Economic Development	4	\$22,550
Community Services	2	\$1,679
<b>Total</b>	<b>6</b>	<b>\$24,229</b>



## INVESTMENT TEST

As shown in the table to the right, M&T made an adequate level of qualified community development investments and grants in MSA 11020 (Altoona, PA) with 64 qualified investments and grants totaling \$539,000. Total qualified investments made in MSA 11020 (Altoona, PA) accounted for 1.0% of total qualified investments made in the State of Pennsylvania. Of the assessment area investments, \$266,000, or 49.0%, were prior period investments, and \$273,000, or 51.0%, were grants to organizations that support affordable housing, community services, and economic development to LMI individuals throughout this assessment area. M&T's level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	7	\$281
Community Services	56	\$243
Economic Development	1	\$15
<b>Total</b>	<b>64</b>	<b>\$539</b>

M&T made rare use of innovative or complex investments and exhibited adequate responsiveness to the credit and community development needs of the assessment. Investments primarily supported affordable housing initiatives through MBS. Of the assessment area investments, 50.0% were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments.

## SERVICE TEST

M&T's performance under the service test in MSA 11020 (Altoona, PA) was good. M&T's delivery systems were readily accessible, and alternative delivery systems enhanced the bank's performance. Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems, and the bank's hours and services were tailored to the convenience and needs of its assessment area. M&T provided a relatively high level of community development services.

### Retail Services

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated nine branches in this assessment area. One (11.0%) of the total branches was in a moderate-income area, which is slightly below the 12.0% of the MSA's population residing in moderate-income areas. There were no branches in low-income census tracts where 1.0% of the population resides.

Alternative delivery systems enhanced the bank's performance in this assessment area. M&T had 18 off-site ATM locations in the assessment area, of which two, or 11.0%, were located in a moderate-income area.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in this assessment area.

The bank's hours and services were tailored to the convenience and needs of its assessment area, including LMI geographies or LMI individuals. Of the total branches in the MSA, all have either early morning, late evening hours, or Saturday hours.

### Community Development Services

As shown in the table to the right, M&T provided a relatively high level of community development services in MSA 11020 (Altoona, PA). Community development services consisted of mortgage education seminars targeting LMI borrowers and first time homebuyers. In addition, management and staff served as directors, advisors, or committee members to 14 nonprofit and community based organizations in the MSA 11020 (Altoona, PA) assessment area.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	16
Financial Literacy	3
Technical Assistance Seminars	1
<b>Total</b>	<b>20</b>

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 39740 (READING, PA)

A limited evaluation of M&T's performance in MSA 39740 (Reading, PA) was completed. M&T's assessment area in this MSA consists of Berks County, PA. According to the 2010 Census, the MSA has 9.0% of the State of Pennsylvania assessment area's population. The City of Reading is the principal city of Berks County.

During the 2012 and 2013 evaluation period M&T had 6.0% of its Pennsylvania HMDA and small business lending activity in this MSA and maintains 13 branches. There are 27 LMI census tracts in the MSA which contain 12.0% of all owner-occupied housing units. One of the branches is located in an LMI census tract. Additionally, 38.0% of all families in the assessment area are LMI. The 13 branches operating in MSA 39740 generated 7.0% of deposits in Pennsylvania as of June 30, 2013. M&T ranks 6<sup>th</sup> out of 20 banks in the MSA with 6.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 39740 (READING, PA)

Examiners conducted a limited scope review of the bank's CRA performance in the MSA 39710 (Reading, PA) assessment area. Examiners determined that the bank's performance in MSA 39710 (Reading, PA) was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Pennsylvania. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 39740	Below	Below	Below

The overall lending test rating for the State of Pennsylvania was high satisfactory. M&T's lending test performance in MSA 39740 (Reading, PA) was not consistent with this performance. M&T's performance for borrower distribution and community development lending were considered good while lending activity and geographic distribution performance were adequate. M&T reported two community development loans totaling \$12.5 million representing 5.0% of all community development lending in the state. The MSA also benefited from \$24 million in statewide community development lending. Performance under the investment test was not consistent with the high satisfactory rating for the State of Pennsylvania. M&T's investment test performance was adequate as less than 1.0% of all qualified investments in Pennsylvania were originated in MSA 39740 (Reading, PA) although the assessment area benefited from \$12 million in statewide investments in Pennsylvania. Performance under the service test was not consistent in both retail and community development services.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 44300 (STATE COLLEGE, PA)

A limited evaluation of M&T's performance in MSA 44300 (State College, PA) was completed. M&T's assessment area in this MSA consists of Centre County, PA. According to the 2010 Census, the MSA has 3.0% of the State of Pennsylvania assessment area's population. The City of State College is the principal city of Centre County. State College is home to Pennsylvania State University.

During the 2012 and 2013 evaluation period M&T had 3.0% of its Pennsylvania HMDA and small business lending activity in this MSA and maintains six branches. There are six LMI census tracts in the MSA. Two of the branches are located in LMI census tracts. There are 16 owner-occupied housing units in low-income census tracts, which is less than 1.0% of the total of owner-occupied housing units. The moderate-income tracts contain 13.0% of all owner-occupied housing units. Additionally, 37.0% of all families in the assessment area are LMI. The six branches operating in MSA 44300 (State College, PA) generated 4.0% of deposits in Pennsylvania as of June 30, 2013. M&T ranks 3<sup>rd</sup> out of 20 banks in MSA 44300 (State College, PA) with 13.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 44300 (STATE COLLEGE, PA)

Examiners conducted a limited scope review of the bank's CRA performance in MSA 44300 (State College, PA) assessment area. Examiners determined that the bank's performance in MSA 44300 (State College, PA) was consistent with the bank's overall performance under the lending, investment, and service tests in the state. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 44300	Consistent	Consistent	Consistent

The overall lending test rating for the State of Pennsylvania was high satisfactory. M&T's lending test performance in MSA 44300 (State College, PA) was consistent with this performance. M&T's performance for lending activity, borrower distribution, geographic distribution and community development lending were all considered good. M&T reported two community development loans totaling \$9.6 million representing 4.0% of all community development lending in the state. MSA 44300 (State College, PA) also benefited from \$24 million in statewide community development lending. Performance under the investment test was consistent with the high satisfactory rating for the State of Pennsylvania. M&T's investment test performance was good with \$2.7 million in qualified investments. Four percent of all

qualified investments in Pennsylvania were originated in MSA 44300 (State College, PA). Performance under the service test was consistent with the outstanding rating for Pennsylvania in both retail and community development services.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 29540 (LANCASTER, PA)

A limited evaluation of M&T's performance in MSA 29540 (Lancaster, PA) was completed. M&T's assessment area in MSA 29540 (Lancaster, PA) consists of Lancaster, County, PA. According to the 2010 Census, the MSA has 10.0% of the State of Pennsylvania assessment area's population. The City of Lancaster is the principal city in MSA 29540 (Lancaster, PA).

During the 2012 and 2013 evaluation period M&T had 5.0% of its Pennsylvania HMDA and small business lending activity in MSA 29540 (Lancaster, PA) and maintains seven branches. There are 18 LMI census tracts in MSA 29540 (Lancaster, PA) and none of the branches are located there. The LMI census tracts contain 8.0% of the owner-occupied housing units. Additionally, 37.0% of all families in the assessment area are LMI. The seven branches operating in MSA 29540 (Lancaster, PA) generated 3.0% of deposits in Pennsylvania as of June 30, 2013. M&T ranks 10<sup>th</sup> out of 18 banks in the MSA with 3.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 29540 (LANCASTER, PA)

Examiners conducted a limited scope review of the bank's CRA performance in the MSA 29540 (Lancaster, PA) assessment area. Examiners determined that the bank's performance in MSA 29540 (Lancaster, PA) was consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Pennsylvania. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 29540	Consistent	Consistent	Below

The overall lending test rating for the State of Pennsylvania was high satisfactory. M&T's lending test performance in MSA 29540 (Lancaster, PA) was consistent with this performance. M&T's performance for lending activity, borrower distribution, geographic distribution and community development lending were all considered good. Community development lending had loans totaling \$5.8 million representing 2.0% of all community development lending in the state. The MSA also benefited from \$24 million in statewide community development lending. M&T's investment test performance was consistent with the high satisfactory rating for the State of Pennsylvania with \$9.1 million in qualified investments representing 14.0% of qualified investments in the State of Pennsylvania. Performance under the service test was not consistent with the outstanding rating for Pennsylvania based on adequate retail and community development services.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 48700 (WILLIAMSPORT, PA)

A limited evaluation of M&T's performance in MSA 48700 (Williamsport, PA) was completed. M&T's assessment area in MSA 48700 (Williamsport, PA) consists of Lycoming County, PA. According to the 2010 Census, the MSA has 2.0% of the State of Pennsylvania assessment area's population. The City of Williamsport is the principal city of Lycoming County.

During the 2012 and 2013 evaluation period M&T had 2.0% of its Pennsylvania HMDA and small business lending activity in MSA 48700 (Williamsport, PA) and maintains four branches. There are three LMI census tracts in MSA 48700 (Williamsport, PA) and none of the branches are located there. The LMI census tracts contain 5.0% of all owner-occupied housing units. Additionally, 38.0% of all families in the assessment area are LMI. The four branches operating in MSA 48700 (Williamsport, PA) generated 3.0% of deposits in Pennsylvania as of June 30, 2013. M&T ranks 3<sup>rd</sup> out of 11 banks in MSA 48700 (Williamsport, PA) with 14.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 48700 (WILLIAMSPORT, PA)

Examiners conducted a limited scope review of the bank's CRA performance in the MSA 48700 (Williamsport, PA) assessment area. Examiners determined that the bank's performance in MSA 48700 (Williamsport, PA) was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Pennsylvania. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 48700	Below	Below	Below

The overall lending test rating for the State of Pennsylvania was high satisfactory. M&T's lending test performance in the Williamsport MSA was not consistent with this performance. M&T's performance for lending activity and borrower distribution were considered good while geographic distribution performance and community development lending performance were adequate. M&T did not report any community development loans in the Williamsport assessment area but the area benefited from \$24 million in statewide community development lending. Performance under the investment test was not consistent with the high satisfactory rating for the State of Pennsylvania. M&T's investment test performance was adequate as less than 1.0% of all qualified investments in Pennsylvania were originated in MSA 48700 (Williamsport, PA) although the assessment area benefited from \$12 million in statewide

investments in Pennsylvania. Performance under the service test was not consistent in both retail and community development services.



## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 10900 (ALLENTOWN-BETHLEHEM-EASTON, PA-NJ)

A limited evaluation of M&T's performance in MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) was completed. M&T's assessment area in this MSA consists of Carbon, Lehigh, and Northampton Counties. According to the 2010 Census, the MSA has 15.0% of the State of Pennsylvania assessment area's population. The cities of Allentown, Bethlehem, and Easton are the principal cities in the MSA.

During the 2012 and 2013 evaluation period M&T had 5.0% of its Pennsylvania HMDA and small business lending activity in this MSA and maintains five branches. There are 51 LMI census tracts in the MSA. Three of the branches are located in LMI census tracts. The LMI census tracts contain 22.0% of the owner-occupied housing units. Additionally, 40.0% of all families in the assessment area are LMI. The five branches operating in MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) generated 1.0% of deposits in Pennsylvania as of June 30, 2013. M&T ranks 21<sup>st</sup> out of 27 banks in the MSA with 1.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 10900 (ALLENTOWN-BETHLEHEM-EASTON, PA-NJ)

Examiners conducted a limited scope review of the bank's CRA performance in the MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) assessment area. Examiners determined that the bank's performance in the MSA was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Pennsylvania. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 10900	Consistent	Below	Consistent

The overall lending test rating for the State of Pennsylvania was high satisfactory. M&T's lending test performance in MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) was consistent with this performance. M&T's performance for lending activity and geographic distribution were good while borrower distribution was adequate. Community development lending was excellent with community development loans totaling \$43.6 million representing 19.0% of all community development lending in the state. The MSA also benefited from \$24 million in statewide community development lending. M&T's investment test performance was not consistent with the high satisfactory rating for the State of Pennsylvania as investment test performance was adequate with \$280,000 in donations and grants. Performance under the

service test was consistent with the outstanding rating for Pennsylvania in based on excellent retail and community development services.

## METROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 30140 (LEBANON, PA)

A limited evaluation of M&T's performance in MSA 30140 (Lebanon, PA) was completed. M&T's assessment area in this MSA consists of Lebanon County, PA. According to the 2010 Census, the MSA has 3.0% of the State of Pennsylvania assessment area's population. The City of Lebanon is the principal city in the MSA.

During the 2012 and 2013 evaluation period M&T had 2.0% of its Pennsylvania HMDA and small business lending activity in this MSA and maintains two branches. Neither of the branches are located in the four moderate-income census tracts in the MSA. The moderate-income census tracts contain 42.0% of the owner-occupied housing units. Additionally, 36.0% of all families in the assessment area are LMI. The two branches operating in MSA 30140 (Lebanon, PA) generated 1.0% of deposits in Pennsylvania as of June 30, 2013. M&T ranks 8<sup>th</sup> out of 11 banks in the MSA with 4.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 30140 (LEBANON, PA)

Examiners conducted a limited scope review of the bank's CRA performance in the MSA 30140 (Lebanon, PA) assessment area. Examiners determined that the bank's performance in the MSA was not consistent with the bank's overall performance under the lending, investment, and service tests in the state. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 30140	Consistent	Below	Below

The overall lending test rating for the State of Pennsylvania was high satisfactory. M&T's lending test performance in MSA 30140 (Lebanon, PA) was consistent with this performance. M&T's performance for lending activity and borrower distribution were good while geographic distribution and community development lending were adequate. Community development lending did not report any community development loans but benefited from \$24 million in statewide community development lending. Performance under the investment test was not consistent with the high satisfactory rating for the State of Pennsylvania as only \$3,000 in grants and donations were reported. Performance under the service test was also not consistent with the outstanding rating for Pennsylvania as retail services were adequate.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN PA NONMETROPOLITAN AREA GROUP B (MONROE COUNTY)

A limited evaluation of M&T's performance in PA Nonmetropolitan area Group B (Monroe County, PA) was completed. According to the 2010 Census, Monroe County area has 4.0% of the State of Pennsylvania assessment area's population. The City of Stroudsburg is the principal city in Monroe County.

During the 2012 and 2013 evaluation period M&T had 1.0% of its Pennsylvania HMDA and small business lending activity in PA Nonmetropolitan area Group B (Monroe County, PA) and has one branch. There are no LMI census tracts in the county. Twenty-eight percent of the families in the county are LMI. The one branch generated less than 1.0% of deposits in Pennsylvania as of June 30, 2013. M&T ranks 12<sup>th</sup> out of 16 banks in the Nonmetropolitan area with 2.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PA NONMETROPOLITAN AREA GROUP B (MONROE COUNTY)

Examiners conducted a limited scope review of the bank's CRA performance in the Nonmetropolitan area Group B (Monroe County, PA) assessment area. Examiners determined that the bank's performance in the MSA was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Pennsylvania. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
PA Nonmetropolitan area Group B	Below	Below	Below

The overall lending test rating for the State of Pennsylvania was high satisfactory. M&T's lending test performance in Nonmetropolitan area Group B (Monroe County) was not consistent with this performance. M&T's performance for lending activity, borrower distribution, geographic distribution and community development lending were all considered adequate. There was no community development lending in the county. The assessment area however, benefited from \$24 million in statewide community development lending. Performance under the investment test was below the high satisfactory rating for the State of Pennsylvania as no qualified investments or donations were reported. Performance under the service test was not consistent with the outstanding rating for Pennsylvania. Both retail and community development services were considered adequate.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN PA NONMETROPOLITAN AREA GROUP C (ADAMS, BEDFORD, FRANKLIN, AND HUNTINGDON COUNTIES)

A limited evaluation of M&T's performance in PA Nonmetropolitan area Group C (Adams, Bedford, Franklin, and Huntingdon, Counties, PA) was completed. The assessment area consists of four contiguous counties located in south central Pennsylvania. According to the 2010 Census, the four counties have 6.0% of the State of Pennsylvania assessment area's population. The area includes the City of Gettysburg in Adams County.

During the 2012 and 2013 evaluation period M&T had 11.0% of its Pennsylvania HMDA and small business lending activity in the assessment area. Fourteen of M&T's branches are located in the four counties. There are three moderate-income census tracts in the assessment area. One of M&T's branches is located in a moderate-income tract. Thirty percent of the families in the assessment area are LMI. The branches generated 6.0% of deposits in Pennsylvania as of June 30, 2013. M&T ranks 4<sup>th</sup> out of 22 banks in the assessment area with 12.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PA NONMETROPOLITAN AREA GROUP C (ADAMS, BEDFORD, FRANKLIN, AND HUNTINGDON COUNTIES)

Examiners conducted a limited scope review of the bank's CRA performance in the PA Nonmetropolitan area Group C (Adams, Bedford, Franklin, and Huntingdon, Counties, PA) assessment area. Examiners determined that the bank's performance in the PA Nonmetropolitan area Group C (Adams, Bedford, Franklin, and Huntingdon, Counties, PA) assessment area was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for the State of Pennsylvania. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
PA Nonmetropolitan area Group C	Consistent	Below	Consistent

The overall lending test rating for the State of Pennsylvania was high satisfactory. M&T's lending test performance in PA Nonmetropolitan area Group C (Adams, Bedford, Franklin, and Huntingdon, Counties, PA) was consistent with this performance. M&T's performance for lending activity, borrower distribution, and geographic distribution were all considered good. Community development lending was adequate. There was no community development lending in the assessment area; however, the assessment area benefited from \$24 million in statewide community development lending. Performance under the investment test was below the high satisfactory rating for the State of Pennsylvania. M&T however made \$646,000 in donations and

grants in the assessment area that targeted community development services and economic development. Performance under the service test was consistent with the outstanding rating for Pennsylvania based on excellent retail services.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN PA NONMETROPOLITAN AREA GROUP D (CLEARFIELD AND CLINTON COUNTIES)

A limited evaluation of M&T's performance in PA Nonmetropolitan area Group D (Clearfield and Clinton Counties) was completed. According to the 2010 Census, the assessment area has 3.0% of the State of Pennsylvania assessment area's population. The two counties are contiguous and located in central Pennsylvania.

During the 2012 and 2013 evaluation period, M&T had 2.0% of its Pennsylvania HMDA and small business lending activity in the assessment area. This assessment area includes four branches. There are seven moderate-income census tracts in the counties, and none of the branches are in the moderate-income census tracts. Forty-three percent of the families in the counties are classified as LMI. The four branches generated 1.0% of deposits in Pennsylvania as of June 30, 2013. M&T ranks 8<sup>th</sup> out of 11 banks in the assessment area with 5.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PA NONMETROPOLITAN AREA GROUP D (CLEARFIELD AND CLINTON COUNTIES)

Examiners conducted a limited scope review of the bank's CRA performance in the PA Nonmetropolitan area Group D (Clearfield and Clinton Counties) assessment area. Examiners determined that the bank's performance in the MSA was not consistent with the bank's overall performance under the lending, investment, and service tests in the state; however, it does not change the rating for Pennsylvania. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
PA Nonmetropolitan area Group D	Below	Below	Below

The overall lending test rating for the State of Pennsylvania was high satisfactory. M&T's lending test performance in Nonmetropolitan area Group D (Clearfield and Clinton Counties) was not consistent with this performance. M&T's performance for the lending test was adequate based on adequate lending activity and geographic distribution performance and excellent borrower distribution performance. Community development lending was considered adequate. There was no community development lending in the counties. The assessment area however, benefited from \$24 million in statewide community development lending. Performance under the investment test was below the high satisfactory rating for the State of Pennsylvania as \$8,000 in donations was reported. Performance under the service test was not

consistent with the outstanding rating for Pennsylvania. Both retail and community development services were considered adequate.



As previously mentioned, limited scope reviews were conducted for the below listed assessment areas in the State of Pennsylvania. The data reviewed, including performance and demographic information, can be found in the Pennsylvania tables in Appendices E, F, G, and H. Conclusions regarding the bank's performance on the lending, investments, and service tests were compared with the overall state rating, which was based on the full-scope assessment area performance. Please see below for a summary of the ratings.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 39740	Below	Below	Below
MSA 44300	Consistent	Consistent	Consistent
MSA 29540	Consistent	Consistent	Below
MSA 48700	Below	Below	Below
MSA 10900	Consistent	Below	Consistent
MSA 30140	Consistent	Below	Below
PA Nonmetropolitan area Group B	Below	Below	Below
PA Nonmetropolitan area Group C	Consistent	Below	Consistent
PA Nonmetropolitan area Group D	Below	Below	Below

M&T's performance in the limited-scope assessment areas did not change the overall state rating.

## STATE OF DELAWARE

### ***CRA RATING FOR DELAWARE<sup>9</sup>: SATISFACTORY***

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

***The Investment test is rated: Low Satisfactory***

***The Service test is rated: Low Satisfactory***

The major factors supporting the rating include:

- Adequate responsiveness to assessment area credit needs;
- Good geographic distribution of loans in the bank's assessment area;
- Good distribution of loans among individuals of different income levels and businesses of different sizes;
- An adequate level of community development lending;
- Reasonably accessible delivery systems to geographies and borrowers of different income levels; and,
- An adequate level of qualified investments.

### **SCOPE OF EXAMINATION**

Examiners evaluation of M&T's activities in the State of Delaware consisted of a full-scope review of DE Nonmetropolitan area (Sussex County) and a limited review of Kent County in MSA 20100 (Dover, DE). Activities within the State of Delaware were made primarily in the DE Nonmetropolitan area (Sussex County) assessment area. Performance ratings for the State of Delaware were based primarily on the evaluation conducted of the DE Nonmetropolitan area (Sussex County) assessment area's deposit concentrations, lending volumes, and branch office network. As of January 1, 2014, Sussex County became a part of the multistate MSA 41540 (Salisbury, MD-DE); however, community development loans, investments, and services from January 1, 2014 to August 31, 2014 were reviewed as part of the evaluation of the DE Nonmetropolitan (Sussex County) assessment area. As shown in Exhibit I on page 10, these assessment areas have a very small proportion of M&T's loans and deposits.

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<sup>9</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN DELAWARE**

As of December 31, 2013, M&T operated 22 branches in the State of Delaware, 15 of which are located in Sussex County, a nonmetropolitan area. One of the 15 branches is located in a moderate-income census tract. There are seven branches in MSA 20100 (Salisbury, MD-DE) of which two branches are in LMI census tracts. The branches offer a full range of products. Sussex County, the southernmost of Delaware's three counties, is bordered by Maryland to the south and east. This very competitive market has 16 banks operating 69 retail branches, with several super-regional banks competing with community banks and savings banks. M&T's primary competitors are PNC Bank, Wells Fargo, and Fulton Bank.

As of June 30, 2013, M&T branches held approximately \$1.4 billion or 2.0% of the bank's deposits in the State of Delaware. M&T ranked 8<sup>th</sup> in the assessment area with 1.0% of the retail deposit market. The DE Nonmetropolitan area (Sussex County) assessment area deposit market is dominated by Discover Bank, which holds 90.0% of all deposits in the county.

### **Community Contacts**

As part of the CRA evaluation process, examiners conducted a community contact with a social service agency that provides services to low-income individuals. The organization offers community-based programs including after school programs, drug prevention, and emergency food services and housing services including financial education, home ownership counseling and mortgage default counseling throughout Delaware. The contact identified a strong need for community development services and affordable housing for individuals and families below the poverty levels.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE**

Conclusions regarding M&T's performance in the State of Delaware with respect to the lending, investment, and service tests are based on the performance in the DE Nonmetropolitan area (Sussex County). Performance under the lending test is rated high satisfactory. M&T's performance under the investment test and service test is rated low satisfactory. M&T's overall conclusions were only slightly influenced by the performance in the State of Delaware which has 2.0% of deposits and 2.0% of loan originations. Specific comments regarding the lending, investment, and service tests are discussed below.

## NONMETROPOLITAN AREA

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN DE NONMETROPOLITAN AREA (SUSSEX COUNTY)

As of December 31, 2013, M&T operated 15 branches located in the DE Nonmetropolitan area (Sussex County), or 68.0% of its retail branches in the State of Delaware, with one branch in an LMI census tract. These branches held approximately \$859 million, or 62.0% of the bank's deposits in Delaware, as of June 30, 2013. M&T ranked 2<sup>nd</sup> in the assessment area with 2.0% of the retail deposit market. The Sussex County deposit market is dominated by Discover Bank, which holds 93.5% of all deposits in the county.

M&T's branches in the assessment area offer a full range of products. Sussex County, the southernmost of Delaware's three counties, is bordered by Maryland to the south and east. This very competitive market has 16 banks operating 69 retail branches, with several super-regional banks competing with community banks and savings banks. M&T's primary competitors are PNC Bank, Wells Fargo, and Fulton Bank.

### PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

#### *Demographic Characteristics*

According to 2010 Census data, the population of DE Nonmetropolitan area (Sussex County) was 197,145. As of 2013 estimates, the population had increased by 4.8%, to 206,649, primarily because the eastern part of the county has attracted a large number of retirees to its beach and resort communities. Forty-six census tracts in the county are middle-income or upper-income. There are seven moderate-income census tracts in DE Nonmetropolitan area (Sussex County) and one census tract with unknown income. The Seaford micropolitan statistical area comprises all of Sussex County and Seaford, in the western part of the county, is the principal city.

While the eastern portion DE Nonmetropolitan area (Sussex County) is home to Delaware's beaches, the western portion of the county is the heart of Delaware's agriculture industry. Poultry is a strong force in the local economy and major employers include Allen's Family Foods, Perdue Farms, and Mountaire Farms. These poultry processing plants employ a sizeable number of migrant workers, mainly from Guatemala and Mexico. Other large employers in DE

Nonmetropolitan area (Sussex County) include the Bayhealth Medical Center and the Beebe Medical Center.

Income Characteristics

During the evaluation period, the FFIEC-adjusted MFI decreased in DE Nonmetropolitan area (Sussex County); however, of Delaware’s three counties, Sussex has the lowest income level. As shown in the table to the right, the MFI decreased from \$62,600 in 2012 to \$57,500 in 2013. The 2010 Census indicates that 38.6% of families in this nonmetropolitan assessment area are designated as LMI.

<b>FFIEC MEDIAN FAMILY INCOMES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
Sussex County	\$62,600	\$57,500

Housing Characteristics

Approximately 50.7% of the housing units are owner-occupied. The area has a high level of vacant units, at 36.6%, although many of these are vacation homes for summer residents. Mobile homes represent a significant portion of housing units, at 21.0%. The median house value in 2010 for Sussex County was \$243,659.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 11,351 businesses in 2013, of which 91.7% were small businesses with GAR of \$1 million or less.

As shown in the table to the right, the unemployment rate for DE Nonmetropolitan area (Sussex County) is decreasing since its peak in 2010 and is consistent with the state unemployment rate. The food processing, tourism and poultry industries provide numerous, but mostly low-paying, jobs in the county. The Beebe Medical Center and Bayhealth Medical Center are also large employers here.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
Sussex County	7.1%	6.7%
State of Delaware	7.1%	6.7%

Additional performance context data for this assessment area is provided in the DE Nonmetropolitan Area (Sussex County) Assessment Area Demographics table on the next page.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: DE Non-MSA</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	10,033	19.6
Moderate-income	7	13.0	6,768	13.2	869	12.8	9,725	19.0
Middle-income	35	64.8	38,140	74.4	2,999	7.9	11,027	21.5
Upper-income	11	20.4	6,347	12.4	221	3.5	20,470	39.9
Unknown-income	1	1.9	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>54</b>	<b>100.0</b>	<b>51,255</b>	<b>100.0</b>	<b>4,089</b>	<b>8.0</b>	<b>51,255</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	11,882	7,178	11.8	60.4	2,976	25.0	1,728	14.5
Middle-income	79,949	44,532	73.5	55.7	10,772	13.5	24,645	30.8
Upper-income	27,651	8,913	14.7	32.2	1,373	5.0	17,365	62.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>119,482</b>	<b>60,623</b>	<b>100.0</b>	<b>50.7</b>	<b>15,121</b>	<b>12.7</b>	<b>43,738</b>	<b>36.6</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,429	12.6	1,310	12.6	70	14.1	49	11.1
Middle-income	7,849	69.1	7,210	69.3	340	68.4	299	67.5
Upper-income	2,073	18.3	1,891	18.2	87	17.5	95	21.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>11,351</b>	<b>100.0</b>	<b>10,411</b>	<b>100.0</b>	<b>497</b>	<b>100.0</b>	<b>443</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.7</b>		<b>4.4</b>		<b>3.9</b>

Based on 2010 ACS Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DE NONMETROPOLITAN AREA (SUSSEX COUNTY)

### LENDING TEST

M&T's performance under the lending test in meeting the credit needs of the DE Nonmetropolitan area (Sussex County) was good. This conclusion is based on good lending activity performance, good geographic and borrower distribution performance, and being a

leader in making community development loans. Greater weight was given to the analysis of refinance and small business lending performance followed by home purchase and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the evaluation of community development lending and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis. Some of the data used to evaluate M&T's performance in this nonmetropolitan area assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in the nonmetropolitan area assessment area reflect good responsiveness to assessment area credit needs. This conclusion was based on consideration of the lending volumes in the current evaluation period in comparison to the prior evaluation period, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending volume was significantly above the aggregate's in this MSA.

M&T's market share of deposits and its market share of lending increased. In 2013, M&T had deposit market share of 2.0%, and lending market share of 1.0% in home purchase lending, 2.0% in refinance lending, 14.0% in home improvement lending, and 3.0% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 0.04%, and lending market share was 0.29% in home purchase lending, 0.64% in refinance lending, 2.0% in home improvement lending, and 0.39% in small business lending.

HMDA and small business volumes for the current evaluation period increased by 125.0% compared to the last evaluation. This increase was driven primarily by increases in all loan types, specifically in home purchase (186.0%), refinance (174.0%), home improvement (168.0%) and small business (48.0%) loan volumes. Comparisons to the aggregate data for the evaluation period indicated overall increased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T's performance was consistent with the lending volume of similarly-situated banks.

## Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflects good penetration in the DE Nonmetropolitan area (Sussex County) assessment area. This conclusion was based on M&T's performance in moderate-income census tracts, as there are no low-income tracts in the assessment area. Lending penetration in moderate-income census tracts was adequate for home purchase and refinance lending, and excellent home improvement and small business lending. An analysis of conspicuous gaps revealed only one middle-income census tract without any loans. The table below details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	0	0	N/A
Moderate	7	0	100%
Middle	35	1	97%
Upper	11	0	100%
<b>2012</b>			
Low	0	0	N/A
Moderate	7	0	100%
Middle	35	1	97%
Upper	11	0	100%

### *Home Purchase*

M&T's home purchase lending in moderate-income census tracts was adequate. In 2013, M&T made 6.5% by number and 2.4% by dollar volume its home purchase loans in moderate-income census tracts which were below the demographics which indicated 11.8% of owner-occupied housing units were located in moderate-income census tracts. Home purchase performance was below the aggregate which made 7.2% of its home purchase loans by number and 5.1% by dollar volume in moderate-income census tracts. Home purchase lending in 2012 was below 2013's performance as performance was below the demographics and aggregate.

### *Refinance*

M&T's refinance lending in moderate-income census tracts was adequate. In 2013, M&T made 7.5% by number and 4.6% by dollar volume of its refinance loans in moderate-income census tracts which were below the demographic which indicated 11.8% of owner-occupied housing units were located in moderate-income census tracts. Refinance performance was above the aggregate which made 6.1% by number and 4.2% by dollar volume of its refinance loans in moderate-income census tracts. Refinance lending in 2012 was comparable to 2013's performance.



### *Home Improvement*

Home improvement lending in moderate-income census tracts was excellent. The bank's home improvement lending was below the demographics of the assessment area, which indicate that 11.8% of the available owner-occupied housing units are located in moderate-income census tracts compared to the bank's 10.9% by number and 3.8% by dollar volume of home improvement loans. Home improvement lending was above the aggregate which made 7.1% by number and 5.2% by dollar volume of its home improvement loans in moderate-income census tracts. Home improvement lending in 2012 was also excellent as performance exceeded the demographic and aggregate.

### *Small Business*

Small business lending in moderate-income census tracts was excellent. In 2013, M&T originated 23.2% by number and 31.2% by dollar volume of its small business loans in moderate-income census tracts, which was above the aggregate's performance of 11.4% by number and 12.9% by dollar volume of small business loans in moderate-income census tracts. Small business lending also exceeded the demographics that indicate 12.6% of businesses are located in moderate-income census tracts. Small business performance in 2012 was comparable to performance in 2013.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the DE Nonmetropolitan area (Sussex County) assessment area reflects good penetration. Overall, lending to low-income borrowers was adequate while lending to moderate-income borrowers and to small businesses was good.

### *Home Purchase*

M&T's overall distribution of home purchase loans was adequate based on adequate distribution to LMI borrowers. M&T's home purchase lending to low-income borrowers was adequate. M&T made 3.9% by number and 0.8% by dollar volume its home purchase loans to low-income borrowers when 19.6% of families in the MSA assessment area are of low-income. Home purchase performance was above the performance of the aggregate which made 2.9% by number and 1.1% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2013 home purchase performance was comparable to its 2012 performance.

Home purchase lending to moderate-income borrowers was adequate. M&T made 13.0% by number and 4.8% by dollar volume of its home purchase loans to moderate-income borrowers when 19.0% of families in the MSA assessment area are of moderate-income. Home purchase performance was above the aggregate which made 10.8% by number and 6.1% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase

performance was below its 2013 performance as performance was below the demographic and the aggregate.

### *Refinance*

M&T's overall distribution of refinance loans to LMI borrowers was adequate based on poor distribution to low-income borrowers and good distribution to moderate-income borrowers. Refinance lending to low-income borrowers was poor as 3.0% by number and 1.4% by dollar volume of refinance loans were to low-income borrowers compared to 19.6% of families in the MSA assessment area which are of low-income. Performance was below the aggregate which made 3.7% by number and 1.7% by dollar volume of its refinance loans to low-income borrowers. M&T's 2012 refinance performance was exceeded its 2013 performance but was below the demographic but above the aggregate.

Refinance lending to moderate-income borrowers was good. M&T made 10.5% by number and 5.7% by dollar volume of its refinance loans to moderate-income borrowers when 19.0% of families in the MSA assessment area are of moderate-income. Refinance performance was above the aggregate which made 8.6% by number 4.3% by dollar volume of its refinance loans to moderate-income borrowers. M&T's 2012 refinance performance exceeded its 2013 performance.

### *Home Improvement*

M&T's overall distribution of home improvement loans to LMI borrowers was good based on adequate distribution to low-income borrowers and good distribution to moderate-income borrowers. M&T's home improvement lending to low-income borrowers was adequate. M&T made 10.9% by number and 2.0% by dollar volume of its home improvement loans to low-income borrowers when 19.6% of families in the MSA assessment area are of low-income. Home improvement performance was above the performance of the aggregate which made 8.2% by number and 1.8% by dollar volume of its home improvement loans to low-income borrowers. Home improvement performance in 2012 was comparable to 2013's performance.

Home improvement lending to moderate-income borrowers was good. M&T made 21.8% of its home improvement loans by number and 6.8% by dollar volume to moderate-income borrowers when 19.0% of families in the MSA assessment area are of moderate-income. Home improvement performance was above the aggregate which made 14.2% by number and 7.8% by dollar volume of its home improvement loans to moderate-income borrowers. M&T's 2012 home improvement performance exceeded its 2013 performance.

### *Small Business*

M&T provided a good level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 61.6% of its small business loans to these businesses, compared to the 91.7% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 45.7% of its small business loans to businesses with GAR of \$1 million or less. The bank made 54.5% of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 93.9% of small business loans in amounts of \$100,000 or less. Small business lending performance in 2012 was comparable to the bank's performance in 2013 in comparison to businesses with GAR of \$ 1 million or less as performance was below the demographic but above the aggregate. The percentage of lending in amounts of \$100,000 or less was also below the aggregates performance.

### **Community Development Lending**

M&T's community development lending performance in the DE Nonmetropolitan area (Sussex County) assessment area demonstrates adequate responsiveness to the community development needs of the assessment area, considering the need and availability of such opportunities for community development in the assessment area. Community development lending consisted of one new loan totaling \$4 million that primarily targeted economic development.

### **INVESTMENT TEST**

M&T's performance under the investment test was rated low satisfactory in the DE Nonmetropolitan area (Sussex County). This conclusion was based primarily on the full scope review of the bank's performance in the DE Nonmetropolitan area (Sussex County) assessment area. In the State of Delaware, M&T made \$4 million in total qualified investments, which represents 1.0% of the bank's total qualified investments. Investment activity was primarily in the limited scope review area of MSA 20100 (Kent County, DE), with 63.0% or \$2.7 million of investments. The DE Nonmetropolitan area (Sussex County) assessment area accounted for \$1.6 million or 37.0% of total state investments.

### **SERVICE TEST**

M&T's performance under the service test in the DE Nonmetropolitan area (Sussex County) was adequate based on based on delivery systems that were reasonably accessible to individuals of different income levels and all portions of the assessment area, changes in branch locations that did not adversely affect accessibility and hours and services that are tailored to the convenience and needs of the assessment area and an adequate level of community development services.

### **Retail Services**

M&T's delivery systems were reasonably accessible to geographies and individuals of different income levels in this assessment area. M&T operated 15 branches in the DE Nonmetropolitan

area (Sussex County). One (7.0%) branch was located in a moderate-income census tract where 6.0% of the population resides. There were no low-income census tracts.

Alternative delivery systems enhanced the bank's performance in this assessment area. M&T had five off-site ATM locations in the assessment area. Of the 15 branches in the DE Nonmetropolitan area (Sussex County), all but one, 93.0% have early morning, late evening, or Saturday hours. The one branch in an LMI census tracts also had extended or Saturday hours.

M&T's record of opening and closing branches did not adversely affect the accessibility of its delivery systems. During the evaluation period, M&T did not open or close any branches in this assessment area.

### Community Development Services

As shown in the table to the right, M&T provided an adequate level of community development services in the assessment area. The bank conducted 29 mortgage education seminars and had a total of 35 community development services. In addition, management and staff served as directors, advisors or committee members to 8 nonprofit and community based organizations in DE Nonmetropolitan area (Sussex County).

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	29
Financial Literacy	3
Small Business Seminars	2
Technical Assistance	1
<b>Total</b>	<b>35</b>

## METROPOLITAN AREA

A limited scope review was conducted for the below listed assessment area in the State of Delaware. The data reviewed, including performance and demographic information, can be found in the Delaware tables in Appendices E, F, G, and H. Conclusions regarding the bank's performance on the lending, investments, and service tests were compared with the overall state rating, which was based on the full-scope assessment area performance.

### DESCRIPTION OF INSTITUTION'S OPERATIONS MSA 20100 (DOVER, DE)

A limited-review evaluation of M&T's performance in MSA 20100 (Dover, DE) was completed. M&T's assessment area in this MSA consists of Kent County. According to the 2010 Census, the county has 45.0% of the State of Delaware assessment area's population.

During the 2012 and 2013 evaluation period, M&T had 30% of its Delaware HMDA and small business lending activity in this assessment area and maintains seven branches. Two of the seven branches are in LMI census tracts. The county has five moderate-income census tracts which contain 9.0% of all owner-occupied housing units. Thirty-seven percent of all families in the assessment area are of low- or moderate-income. The seven branches generated 38.0% of M&T's deposits in Delaware as of June 30, 2013. M&T ranks 1<sup>st</sup> out of 12 banks in the county with 28.0% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 20100 (DOVER, DE)

Examiners conducted a limited scope review of the bank's CRA performance in the MSA 20100 (Dover, DE) assessment area. Examiners determined that the bank's performance in the assessment area was consistent with the bank's overall performance in the State of Delaware under the lending and investment tests and exceeds performance under the service test. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 20100	Consistent	Consistent	Exceeds

The overall lending test rating for the State of Delaware was high satisfactory. M&T's lending test performance in the MSA assessment area was consistent with this performance based on good lending activity and borrower distribution performance while geographic distribution performance was adequate. Community development lending was good in the county with \$7.5 million in community development loans. Performance under the investment test was consistent with the M&T's adequate performance for the State of Delaware. Performance under the service test exceeds the bank's adequate performance based on excellent retail services and adequate community development services.

## STATE OF VIRGINIA

### ***CRA RATING FOR VIRGINIA<sup>10</sup>: SATISFACTORY***

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

***The Investment test is rated: Low Satisfactory***

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

The major factors supporting the rating include:

- Good geographic distribution of loans in the bank's assessment area;
- A relatively high level of community development lending;
- Good responsiveness to assessment area credit needs;
- Poor distribution of loans among individuals of different income levels and businesses of different sizes;
- An adequate level of qualified investments;
- Readily accessible delivery systems to essentially all portions of the bank's assessment area;
- A record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals;
- The bank's reasonableness of business hours and services do not vary in a way that inconveniences any portions of the assessment area; and
- A relatively high level of community development services.

### **SCOPE OF EXAMINATION**

Examiners evaluation of M&T activities in the State of Virginia consisted of a full-scope review of MSA 40060 (Richmond, VA). Activities within the State of Virginia were made entirely within MSA 40060 (Richmond, VA). Performance ratings for the State of Virginia were based solely on the evaluation conducted of MSA 40060 (Richmond, VA) assessment area's deposit concentrations, lending volumes, and branch office network. As shown in Exhibit I on page 10, activities in the State of Virginia made up less than 1.0% of the bank's deposits, less than 1.0% of branches, and 1.0% of the bank's loans.

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<sup>10</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN VIRGINIA**

As of December 31, 2013, M&T operated five branches in the State of Virginia. Two of the five branches were located in LMI census tracts. As detailed in Exhibit I on page 10, M&T maintained a deposit base equal to \$68 million in the State of Virginia assessment area. Total HMDA lending and small business lending was approximately 1.0% of M&T's total lending.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA**

Conclusions regarding M&T's performance in the State of Virginia with respect to the lending, investment, and service tests are based solely on performance in MSA 40060 (Richmond, VA). M&T's performance with respect to lending, investment, and service tests are generally similar to the overall conclusions of the bank. Performance under the lending and investment test are rated low satisfactory, and performance under the service test is rated high satisfactory. Specific comments regarding the lending, investment, and service tests are discussed below.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 40060 (RICHMOND, VA)**

As of December 31, 2013, M&T operated five branches in MSA 40060 (Richmond, VA), representing less than 1.0% of the bank's overall branches. The MSA contained 1.0% of the bank's HMDA and small business loans. As of June 30, 2013, M&T's presence within the MSA is limited as the bank ranks 21<sup>st</sup> out of 35 in terms of deposit market share.

### **Community Contacts**

A contact was made with a local economic development official to discuss economic conditions impacting businesses. The contact stated that the economy in the Greater Richmond area is improving with the hopes of continued economic development through the attraction of new business activity. The contact stated the area needs more affordable housing and that certain areas are in need of revitalization. The contact also stated that there is a need for affordable transportation as many low- and moderate- individual that live in the city do not have access to employment opportunities in the surrounding counties.

Another contact in the area noted that the Richmond economy has fared better than other areas in Virginia and other areas in the country because of its diverse industry base. Affordable housing and financial education were noted as primary needs in the community. The contact indicated that many low- and moderate-individuals are having difficulty qualifying for mortgages due to an inability to absorb the costs of home ownership therefore there is a need for financial education to prepare the prospective homeowners for the costs and responsibilities of home ownership.

## PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

### Demographic Characteristics

M&T's assessment area includes Hanover and Henrico Counties, and the City of Richmond. The assessment area has a population of approximately 611,012. The area's family poverty rate, 6.5%, is lower than that of the State of Virginia (7.0%) and the MSA (6.9%).

### Income Characteristics

For purposes of classifying borrower income, this evaluation uses the FFIEC-adjusted MFI for the relevant area. As shown in the table to the right, the estimated MFI for the years 2012 and 2013 for the MSA decreased by \$1,700 during this time period.

FFIEC MEDIAN FAMILY INCOME		
Area	2012	2013
MSA 40060	\$75,600	\$73,900

### Housing Characteristics

The assessment area housing market experienced price and sales volume declines like many other urban areas across the nation over the past five years but it has begun to show signs of stabilization. In 2010, the median home price in the metro Richmond area was \$199,925, which decreased by 7.5% in 2011 to \$184,975. This trend is comparable to the broader Central Virginia market, although sales volume was up slightly more in the greater Richmond area. In 2012, the Richmond area median home price rebounded by 2.7% with sales volume up by more than 15.0%. As shown in the table above, the median home sales price increased by \$13,900 from 2012 to 2013. Median prices have remained considerably lower in the assessment area's cities but sale prices and volumes across the assessment area are less volatile than in previous years.

MEDIAN HOME SALES PRICE		
Area	2012	2013
MSA 40060	\$193,600	\$207,500

The assessment area's affordability ratio is 25.2 compared to the State of Virginia at 24.1, indicating that housing is more affordable in the assessment area than statewide. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio means the housing is considered more affordable while a lower ratio means the housing is considered less affordable.

Despite the assessment area's relative affordability, housing costs present a challenge for many homeowners and renters, with Richmond City leading the way. In Richmond City, 37.0% of homeowners and 54.0% of renters are considered cost-burdened, meaning that homeownership



or rental costs account for more than 30.0% of household income. Comparatively, 29.0% of homeowners and 44.0% of renters statewide are cost-burdened. All other areas inside the assessment area have lower percentages of owners who are cost-burdened than the state, whereas Henrico County, Chesterfield County, and Petersburg City all have a higher percentages of cost-burdened renters. Richmond City's challenges are notable because of its higher percentage of extremely cost-burdened homeowners and renters for whom housing costs account for more than 50.0% of household income. Nearly 16.0% of homeowners and 27.0% of renters in Richmond County are extremely cost-burdened.

Mortgage delinquencies have had an adverse impact on the local housing market as a result of the national housing crisis but to a lesser extent than other urban areas across the county. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, declined slightly across the Richmond metro area from 4.8% in January 2010 to 4.7% in December 2012, although Richmond and Petersburg cities continue to experience challenges. As of December 2012, 7.9% of mortgages in Richmond City and 7.8% in Petersburg City were seriously delinquent, placing additional strains on the housing market recovery in these jurisdictions. HMDA data for the assessment area show that demand for home purchase loans of owner occupied, one-to-four family dwellings has also stabilized. After the number of annual home purchase loan originations decreased by 57.0% from 2005 to 2010, there was only a slight decrease in activity from 2010 to 2011, with the number of annual originations remaining above 9,000. Refinance activity across the assessment area has remained more active in recent years but the number of annual loan refinances continues to decline.

#### Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 34,966 businesses in 2013, of which 89.1% were small businesses with GAR of \$1 million or less.

The Commonwealth of Virginia is a unique state in regard to its political subdivision classification system, because cities such as Richmond and Petersburg are independent, meaning they are separate jurisdictions from counties. Residents of Virginia cities vote for city councils and mayors, pay city real estate and personal property taxes and get business and professional licenses from city officials. Richmond City is the Virginia state capital and had a population of 204,414 people in 2010. Much of the area's low-income population resides in Richmond City. The greater Richmond area is part of the Richmond MSA which is located in central Virginia, approximately 90 miles south of Washington DC.

As of 2011, total employment for the Richmond MSA was 767,954, representing less than 1.0% in total employment growth since 2009. Top employment sectors include retail trade, professional, scientific and technical services and finance and insurance. Combined, these sectors accounted for 174,675 jobs in 2011, or 28.0% of all private, nonfarm employment. The area is also home to more than 125,000 government jobs, the majority of which are state and local

government. Government and government enterprise jobs accounted for nearly 17.0% of total employment in the MSA.

Employment across the region has been relatively strong in light of the nation’s recent economic challenges due to, in part, companies increasing their presence in the Richmond market. For example, in November 2011, life sciences company Health Diagnostics Laboratory (HDL) announced its planned expansion in the Virginia BioTechnology Park. The \$68.5 million capital investment and 653 net new jobs make HDL one of the fastest growing and largest employers in Richmond and Virginia. In 2010, MeadWestvaco (MWV) began the relocation of its Center for Packaging Innovation to Richmond, resulting in 128 jobs and an estimated \$10 million in capital investment. Additionally, technology company Tumblr has expanded its presence in Richmond by hiring more employees and moving into a larger space.

Top employers in the Richmond area include Capital One, Virginia Commonwealth University Health System, HCA Virginia Health System and Bon Secours Richmond Health System. The assessment area is also home to Fort Lee, the 3rd largest training site for the US Army. Fort Lee has experienced significant growth in recent years as a result of the 2005 Base Realignment and Closure (BRAC) mandates by the federal government, which resulted in the closure of some military bases and the expansion of others. Fort Lee is designated as an Army Sustainment Center of Excellence, a focused training base for military supply, subsistence, maintenance, munitions, transportation, and more. Approximately 70,000 trainees pass through the facility’s classrooms each year. Employment at the Fort totaled 5,250 military and 5,325 civilian personnel in 2011. The fort’s annual regional economic impact in 2011 was approximately \$1.7 billion.

Since the Richmond area unemployment rate peaked in 2009 at 8.1%, regional economic conditions have gradually improved. The table to the right shows that unemployment rates across the assessment area have fluctuated in recent years, with Richmond City, Hopewell City and Petersburg City remaining at elevated levels relative to the other jurisdictions in the assessment area, the MSA, and the State of Virginia. All remaining counties in the assessment area remain well-below the 2011 and 2012 nationwide average unemployment rates of 8.9% and 8.1%, respectively.

<b>AVERAGE ANNUAL UNEMPLOYMENT RATE</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
Hanover County	5.6%	5.0%
Henrico County	5.9%	5.4%
Richmond City	10.4%	9.3%
MSA 40060	6.4%	5.9%
State of Virginia	5.9%	5.5%

Additional performance context data for this assessment area is provided in the MSA 40060 (Richmond, VA) Assessment Area Demographics table on the next page.

**Assessment Area Demographics**  
Assessment Area: MSA 40060

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	20	13.1	14,557	9.9	5,572	38.3	33,919	23.1
Moderate-income	39	25.5	32,994	22.5	4,403	13.3	25,195	17.2
Middle-income	44	28.8	43,421	29.6	2,962	6.8	28,883	19.7
Upper-income	49	32.0	55,580	37.9	1,399	2.5	58,555	40.0
Unknown-income	1	0.7	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>153</b>	<b>100.0</b>	<b>146,552</b>	<b>100.0</b>	<b>14,336</b>	<b>9.8</b>	<b>146,552</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	29,871	8,198	5.5	27.4	17,027	57.0	4,646	15.6
Moderate-income	69,386	28,331	19.0	40.8	32,345	46.6	8,710	12.6
Middle-income	76,950	47,076	31.5	61.2	24,464	31.8	5,410	7.0
Upper-income	89,571	65,707	44.0	73.4	18,231	20.4	5,633	6.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>265,778</b>	<b>149,312</b>	<b>100.0</b>	<b>56.2</b>	<b>92,067</b>	<b>34.6</b>	<b>24,399</b>	<b>9.2</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2,581	7.4	2,136	6.9	340	13.6	105	8.0
Moderate-income	8,177	23.4	7,135	22.9	645	25.8	397	30.4
Middle-income	10,687	30.6	9,553	30.7	764	30.5	370	28.3
Upper-income	13,483	38.6	12,313	39.5	739	29.5	431	33.0
Unknown-income	38	0.1	19	0.1	14	0.6	5	0.4
<b>Total Assessment Area</b>	<b>34,966</b>	<b>100.0</b>	<b>31,156</b>	<b>100.0</b>	<b>2,502</b>	<b>100.0</b>	<b>1,308</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>89.1</b>		<b>7.2</b>		<b>3.7</b>

Based on 2010 ACS Information

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 40060 (RICHMOND, VA)**

**LENDING TEST**

M&T's performance under the lending test in meeting the credit needs of MSA 40060 (Richmond, VA) was good. This conclusion is based on good lending activity performance, good geographic distribution performance, a relatively high level of community development loans, and poor borrower distribution performance. Greater weight was given to the analysis of home purchase and refinance lending performance followed by small business lending in the analysis of geographic and borrower distribution based on loan volumes. Home improvement,

multifamily, and small farm lending were not evaluated as lending volumes were insufficient for meaningful analysis. Multifamily lending was considered in the analysis of community development loans. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's lending levels in MSA 40060 (Richmond, VA) reflect good responsiveness to assessment area credit needs. This conclusion was based on consideration of the bank's lending volumes in comparison to the prior evaluation, market share, and performance compared to peer banks and market aggregate data. Comparison to the aggregate of all lenders in the assessment area indicated that M&T's lending volume was above the aggregate in this MSA.

M&T's market share of deposits was stable while its market share of lending increased with the exception of home improvement lending, which decreased. In 2013, M&T had a deposit market share of less than 1.0%, and lending market share of 1.0% in home purchase lending, 0.5% in refinance lending, 0.1% in home improvement lending, and 0.4% in small business lending. In comparison, during the last evaluation, the 2010 deposit market share was 0.1%, and lending market share was 0.3% in home purchase lending, 0.1% in refinance lending, 0.2% in home improvement lending, and 0.3% in small business lending.

HMDA and small business volumes for the current evaluation period increased by 79.0% compared to the last evaluation. This increase was driven primarily by increase in home purchase (100.0%), refinance (160.0%), and small business (6.0%) loan volumes, partially offset by a decrease in home improvement (-60.0%) loan volumes. Comparisons to the aggregate data for the evaluation period indicated overall increased lending volumes. Peer comparisons of the number of loans originated per billion dollars of deposits indicated that M&T's outperformed similarly-situated banks.

### **Geographic Distribution**

M&T's overall geographic distribution of home purchase, refinance, and small business loans reflects good penetration in the MSA 40060 (Richmond, VA) assessment area. Home improvement lending was not evaluated as the volume of lending was insufficient to analyze. In 2013, M&T made a total of one home improvement loan in an upper-income tract. Lending penetration in LMI census tracts was excellent for home purchase and refinance lending, and adequate for small business lending.

M&T's responsiveness to meeting the needs of its community is also demonstrated through analysis of conspicuous gaps in lending in low- or moderate-income census tracts. As shown in the table below, M&T demonstrated good responsiveness to the credit needs of the assessment area by having good penetration rates in tracts of low- or moderate-income. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2013</b>			
Low	20	9	55%
Moderate	39	9	77%
Middle	44	18	59%
Upper	49	18	63%
<b>2012</b>			
Low	20	14	30%
Moderate	39	25	36%
Middle	44	17	61%
Upper	49	19	61%

During the evaluation period, M&T originated loans in a majority of the census tracts within the assessment area, while middle- and upper-income tracts had a greater percentage of tracts without loans. The table above reveals an improving trend with better performance 2013 compared to 2012.

#### *Home Purchase*

The overall distribution of home purchase loans was excellent in LMI census tracts. M&T's home purchase lending in low-income census tracts was excellent. In 2013, M&T made 9.2% by number and 5.1% by dollar volume of its home purchase loans in low-income tracts which was above the demographics which indicate that 5.5% of owner-occupied housing units are located in low-income census tracts. M&T's performance was above the performance of the aggregate which made 2.8% by number and 1.3% by dollar volume of its home purchase loans in low-income census tracts. Home purchase lending performance in 2012 was comparable to 2013's performance.

Home purchase lending in moderate-income census tracts was excellent. In 2013, M&T made 24.1% by number and 11.8% by dollar volume of its home purchase loans in moderate-income census tracts which were above the demographics which indicate that 19.0% of owner-occupied housing units were located in moderate-income census tracts. M&T's performance was also above the aggregate which made 17.1% by number and 10.4% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase lending in 2012 was below 2013's performance.

#### *Refinance*

The overall level of refinance loans in LMI census tracts was good based on excellent performance in moderate-income tracts and good performance in low-income tracts. Refinance lending in low-income census tracts was good. In 2013, M&T made 6.0% by number and 4.1% by dollar volume of its refinance loans in low-income census tracts which was similar the

demographic which indicates that 5.5% of owner occupied-housing units were located in low-income census tracts. M&T's performance was above the aggregate's performance which made 3.4% by number and 5.7% by dollar volume of its refinance loans in low-income census tracts. Refinance lending in 2012 was below 2013's performance.

M&T's refinance lending in moderate-income census tracts was excellent. In 2013, M&T made 39.8% by number and 31.5% by dollar volume of its refinance loans in moderate-income census tracts which were above the demographic which indicated 19.0% of owner-occupied housing units are located in moderate-income census tracts. M&T's refinance performance was above the aggregate which made 15.4% by number and 15.3% by dollar volume of its refinance loans in moderate-income geographies. Refinance lending in 2012 was below 2013's performance.

### *Small Business*

M&T's small business performance in LMI census tracts was adequate. In 2013, M&T originated 5.1% (2 loans) and 1.5% by dollar volume of its small business loans in low-income census tracts, which was below the aggregate's performance of 7.1% by number and 10.1% by dollar volume of small business loans in low-income census tracts. Small business lending was also below the demographics, which indicate that 7.4% of businesses are located in low-income census tracts. Small business lending in 2012 was below 2013's performance.

Small business lending performance in moderate-income census tracts was adequate. In 2013, M&T originated 15.4% by number and 8.2% by dollar volume of its small business loans in moderate-income census tract, Performance was below the aggregate's which made 19.1% by number and 21.6% by dollar volume of small business loans in moderate-income census tracts. Small business lending was also below the demographics, with 23.4% of businesses located in moderate-income census tracts. Small business performance in 2012 was comparable to performance in 2013.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MSA 40060 (Richmond, VA) assessment area reflects poor penetration. Overall, lending to LMI borrowers was poor while small businesses lending was good. Home improvement lending was not evaluated as the volume was insufficient to analyze. Within the MSA there is a wide disparity between housing process and income. As reported by NAR, the median housing price in 2013 was five times the income of a low-income individual and two times the income of a moderate-income individual making it difficult for a low-income individual to afford a home. It is noted that a substantial number of loans within this assessment area have unknown income designations

### *Home Purchase*

M&T's home purchase lending to LMI borrowers was poor. M&T made one of its home purchase loans less than 1.0% to a low-income borrower when 23.1% of families in the MSA assessment area are of low-income. Home purchase performance was below the performance of the aggregate which made 8.9% by number and 4.2% by dollar volume of its home purchase loans to low-income borrowers. M&T's 2012 home purchase performance exceeded its 2013 performance.

Home purchase lending to moderate-income borrowers was poor. M&T made 3.5% by number and 2.1% by dollar volume of its home purchase loans to moderate-income borrowers when 17.2% of families in the MSA assessment area are of moderate-income. Home purchase performance was below the aggregate which made 20.7% by number and 14.3% by dollar volume of its home purchase loans to moderate-income borrowers. M&T's 2012 home purchase performance was above its 2013 performance.

### *Refinance*

Refinance lending to low-income borrowers was poor as the bank did not make any refinance loans to LMI borrowers. This compares to the 23.1% and 17.2% of families in the MSA assessment area which are of LMI respectively. Performance was below the aggregate which made 7.5% by number and 3.6% by dollar volume and 16.0% by number and 9.5% by dollar volume its refinance loans to LMI borrowers respectively. M&T's 2012 refinance performance was adequate for moderate-income borrowers but otherwise comparable to its 2013 performance.

### *Small Business Lending*

M&T provided a good level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 53.8% by number and 41.8% by dollar volume of its small business loans to these businesses, compared to the 89.1% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 46.1% by number and 30.0% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 64.1% by number and 19.4% by dollar volume of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 88.4% by number and 24.1% by dollar volume of small business loans in amounts of \$100,000 or less; however, the aggregate includes credit card lenders which typically extend small dollar credit facilities. Small business lending performance in 2012 was comparable to the bank's performance in 2013 in comparison to businesses with GAR of \$1 million or less as performance was below the demographic. The percentage of lending in amounts of \$100,000 or less was also below the aggregate's performance.

### Community Development Lending

As shown in the table to the right, M&T made a relatively high level of community development loans in the State of Virginia. During the evaluation period, community development lending in Virginia totaled \$55.4 million with all lending representing new originations since the prior CRA evaluation. Within the MSA, M&T made three loans totaling \$24.8 million. Community development lending also included two loans for \$30.7 million in the State of Virginia outside of M&T's assessment area in the state since M&T had been responsive to the credit and community development needs of its assessment area.

COMMUNITY DEVELOPMENT LENDING		
Purpose	#	\$('000s)
Revitalize and Stabilize	3	24,750
<b>Total</b>	<b>3</b>	<b>24,750</b>

Community development lending initiatives targeted revitalization and stabilization of LMI areas as well as community service initiatives (75.8% and 24.2% of total statewide initiatives, respectively).

### INVESTMENT TEST

M&T made an adequate level of qualified community development investments and grants in MSA 40060, with \$3.5 million of qualified investments dedicated to activities inside MSA 40060. Additionally, M&T made \$1 million in qualified investments on a statewide basis. Total qualified investments made in the State of Virginia accounted for 0.8% of M&T's total investments. On an annualized basis, qualified investments in this assessment area increased by 70% compared to last evaluation, when M&T made \$2 million in investments. Of the investments made in MSA 40060, 62.0% were new investments made in the current evaluation period. M&T's level of qualified investments was comparable to that of similarly-situated large retail banks operating in the assessment area.

M&T exhibited adequate responsiveness to the credit and community development needs of the assessment area, with investment activities only targeting affordable housing projects for LMI individuals. All of the investments made in the State of Virginia were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments. The bank made rare use of innovative or complex investments to support community development initiatives.

### SERVICE TEST

M&T's performance under the service test in MSA 40060 (Richmond, VA) was good based on based on delivery systems that were readily accessible to individuals of different income levels and all portions of the assessment area, changes in branch locations that did not adversely affect accessibility and hours and services that are tailored to the convenience and needs of the assessment area and a relatively high level of community development services.



## Retail Services

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated five branches in this assessment area, one (20%) of which was located in a low-income area and one (20%) was located in a moderate-income area. This compares reasonably to the 11.3% of the MSA's population residing in low-income areas and 24.1% of the population residing in moderate-income areas.

Alternative delivery systems did not enhance the bank's performance in this assessment area group. M&T had 7 off-site ATM locations in the assessment area, of which none were located in LMI areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T closed one branch in a middle-income tract in this assessment area.

Hours and services are tailored to the convenience and needs of its assessment area, particularly LMI geographies or LMI individuals. All five of the branches located in the MSA have either early morning, late evening hours, or Saturday hours.

## Community Development Services

As shown in the table to the right, M&T provided a relatively high level of community development services during the evaluation period. The table reflects the number and type of services provided by the bank.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>Purpose</b>	<b>#</b>
Mortgage Education Seminars	21
Small Business Seminars	11
<b>Total</b>	<b>32</b>

In addition, management and staff served as advisors and committee members to two nonprofit and community based organizations in the Richmond assessment area.

## STATE OF FLORIDA

### ***CRA RATING FOR FLORIDA<sup>11</sup>: SATISFACTORY***

***The Lending test is rated: Low Satisfactory***

***The Investment test is rated: Low Satisfactory***

***The Service test is rated: Low Satisfactory***

The major factors supporting the rating include:

- An adequate level of qualified investments;
- Adequate responsiveness to assessment area credit needs;
- Adequate geographic distribution of loans in the bank's assessment area;
- Adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- Accessible delivery systems to geographies and borrowers of different income levels;
- An adequate level of community development services; and
- An adequate level of community development lending.

### **SCOPE OF EXAMINATION**

Examiners evaluation of M&T's activities in the State of Florida consisted of a full-scope review of MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL). Activities within the State of Florida were made entirely within MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL). Performance ratings for the State of Florida were based solely on the evaluation conducted of MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area's deposit concentrations, lending volumes, and branch office network. As shown in Exhibit I on page 10, this assessment area has a very small proportion of M&T's loans and deposits.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA**

As of December 31, 2013, M&T operated one branch in MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL). The branch's activities represent less than 1.0% of the bank's deposits, branches, and the bank's loans. The branch represents M&T's only presence in the State of Florida and was the result of the acquisition of Wilmington Trust in May 2011. M&T's

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<sup>11</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

presence within the MD is limited as the bank ranks 52<sup>nd</sup> in terms of deposit market share as reported by the FDIC as of June 30, 2013.

### **Community Contacts**

In the Florida assessment area, one community contact was done with a micro lender that serves the entire State of Florida with Miami and Orlando being its principal markets. The contact indicated that small business owners are still struggling from the recent recession and that access to capital is a primary need as well as financial education for these business owners.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA**

Conclusions regarding M&T's performance in the State of Florida with respect to the lending, investment, and service tests are based solely on performance in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL). M&T's performance under the lending test in the State of Florida was low satisfactory. Performance under the investment test was rated low satisfactory, and performance under the service test was rated low satisfactory. Specific comments regarding the lending, investment, and service tests are discussed below.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD 48424 (WEST PALM BEACH-BOCA RATON-BOYNTON BEACH, FL)**

During the evaluation period, M&T operated one branch in MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) is located in Florida. Based on FDIC deposit data as of June 30, 2013, M&T held \$15 million in deposits in MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) is located in Florida, which represents less than 1.0% of the bank's total deposits. M&T's total combined HMDA-related and small business originations extended in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) is located in Florida represented less than 1.0% of the bank's overall loan totals.

### **PERFORMANCE CONTEXT**

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

#### ***Demographic Characteristics***

M&T's assessment area includes West Palm Beach, Florida. Palm Beach County, situated in MD 448424 (West Palm Beach-Boca Raton-Boynton Beach, FL), is the second largest county by total land area in Florida. The largest city and the county seat is West Palm Beach. Other large cities include Boca Raton, Boynton Beach, Delray Beach, Wellington, and Jupiter. According to

the 2010 Census, Palm Beach County had a population of 1.3 million. The 2010 Census also noted that 21.6% of the MD's population is 65 and older in age, compared to the national average of 13.0%. Many senior citizens already own homes and generally do not need refinancing, which may reduce lending opportunities.

Income Characteristics

As shown in the table on the right, FFIEC-adjusted figures for MFI increased by \$500 from 2012 to 2013. MFI in the MD is higher than the Florida MFI of \$55,774, according to the 2010 Census. In addition, the 2010 Census indicates that 39.3% of families in the MD are designated as LMI with 8.6% of the families in the MD living below the poverty level.

FFIEC MEDIAN FAMILY INCOMES		
Area	2012	2013
MD 48424	\$64,100	\$64,600

Housing Characteristics

According to the 2010 Census, the MD contained 657,106 housing units. One-to-four family units comprised 68.3% of the housing units, while five or more family units comprised 31.6%. The median value of owner-occupied housing units was \$261,889. The high housing costs in relation to family incomes limits opportunities for home purchase lending, particularly for LMI individuals. In addition, only 3.0% of owner-occupied housing units are in low-income census tracts while 22.1% of such units are in moderate-income census tracts. Furthermore, the median rent is \$1,129; however close to 56.0% of renters pay more than 30.0% of their income for rent. Thus, housing affordability is a significant issue for some lower income residents.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 109,302 businesses in 2013, of which 92.2% were small businesses with GAR of \$1 million or less.

According to the Palm Beach County Business Development Board, Palm Beach County has a growing economy. The county is one of the wealthiest in the nation with per capita personal income levels nearly 50% higher than state and national averages. The county's diversifying economic base, sound financial position, luxury tourism, technology, manufacturing, and agriculture all contribute to the positive outlook.

As shown in the table to the right, unemployment declined from 2012 to 2013. The main industries in MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) are trade, transportation, and utilities, leisure and hospitality, and local government

AVERAGE ANNUAL UNEMPLOYMENT RATES		
Area	2012	2013
MD 48424	12.0%	10.2%

Additional performance context data for this assessment area is provided in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) Assessment Area Demographics table below.

### Assessment Area Demographics

Assessment Area: MD 48424

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	21	6.2	13,451	4.1	3,949	29.4	69,853	21.5
Moderate-income	84	24.9	76,125	23.4	12,206	16	57,945	17.8
Middle-income	106	31.4	111,619	34.4	6,984	6.3	61,493	18.9
Upper-income	118	34.9	123,645	38.1	4,718	3.8	135,558	41.7
Unknown-income	9	2.7	9	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>338</b>	<b>100.0</b>	<b>324,849</b>	<b>100.0</b>	<b>27,857</b>	<b>8.6</b>	<b>324,849</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	31,566	11,401	3.0	36.1	12,446	39.4	7,719	24.5
Moderate-income	168,116	85,008	22.1	50.6	48,837	29.0	34,271	20.4
Middle-income	227,348	139,073	36.1	61.2	45,702	20.1	42,573	18.7
Upper-income	230,067	149,504	38.8	65	31,170	13.5	49,393	21.5
Unknown-income	9	9	0.0	100	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>657,106</b>	<b>384,995</b>	<b>100.0</b>	<b>58.6</b>	<b>138,155</b>	<b>21.0</b>	<b>133,956</b>	<b>20.4</b>
	<b>Total Businesses by Tract</b>		<b>Businesses by Tract &amp; Revenue Size</b>					
			<b>Less Than or = \$1</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
			#	%	#	%	#	%
Low-income	4,129	3.8	3,669	3.6	273	5.4	187	5.3
Moderate-income	21,253	19.4	19,275	19.1	1,208	24.0	770	21.8
Middle-income	34,665	31.7	31,988	31.8	1,622	32.3	1,055	29.8
Upper-income	49,018	44.8	45,625	45.3	1,881	37.4	1,512	42.7
Unknown-income	237	0.2	177	0.2	44	0.9	16	0.5
<b>Total Assessment Area</b>	<b>109,302</b>	<b>100.0</b>	<b>100,734</b>	<b>100.0</b>	<b>5,028</b>	<b>100.0</b>	<b>3,540</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.2</b>		<b>4.6</b>		<b>3.2</b>

Based on 2010 ACS Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD 48424 (WEST PALM BEACH-BOCA RATON-BOYNTON BEACH, FL)

### LENDING TEST

M&T's performance under the lending test in meeting the credit needs of MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) was adequate. This conclusion is based on adequate lending activity performance, adequate geographic and borrower distribution performance, and a low level of community development loans. Some of the data used to evaluate M&T's performance in this MD assessment area appears in Appendices E, G, and H.

## **Lending Activity**

M&T's responsiveness to retail credit needs in MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) was adequate. Since the MD became a part of M&T's assessment areas for part of the prior evaluation period, lending trends between evaluation periods and market share information does not produce a meaningful analysis.

## **Geographic Distribution**

M&T's overall geographic distribution of home purchase and refinance loans reflects adequate penetration in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area. Opportunities for lending in low-income census tracts are limited as 29.4% of families in low-income census tracts have incomes below the poverty level. In 2013, M&T made no home improvement loans or small business loans in LMI census tracts. In 2013, M&T did not make any home purchase loans in low-income census tracts. In 2013, M&T only made one refinance loan in a low-income census tract. Because opportunities to lend in low-income census tracts were limited, an analysis was conducted only on M&T's performance for home purchase lending and refinance lending in moderate-income geographies.

Because the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area originated less than 1.0% of the bank's total loan originations during the review period, and the bank maintained a limited presence in this assessment area, a lending penetration table was not included.

### *Home Purchase*

Home purchase lending in moderate-income census tracts was adequate. In 2013, M&T made 3 of 25 home purchase loans (12.0%) and 6.8% by dollar volume in moderate-income census tracts which were below the demographics which indicated 22.1% of owner-occupied housing units were located in moderate-income census tracts. Home purchase performance was also below the aggregate which made 12.8% by number and 6.2% by dollar volume of its home purchase loans in moderate-income census tracts. Home purchase lending in 2012 was below 2013's performance.

### *Refinance*

M&T's refinance lending in moderate-income census tracts was excellent. In 2013, M&T made 23.5% by number and 15.7% by dollar volume of its refinance loans in moderate-income census tracts which were above the demographic which indicated 22.1% of owner-occupied housing units were located in moderate-income census tracts. M&T's performance was above the aggregate which made 13.0% by number and 11.6% by dollar volume of its refinance loans in moderate-income census tracts. Refinance lending in 2012 was below 2013's performance.

### Distribution by Borrower Income and Revenue Size of Business

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area reflects adequate penetration. Nearly all of the loans within the assessment were purchased by the institution; therefore, very few loans have reported borrower income and a meaningful analysis could not be performed.

### Community Development Lending

M&T's performance was adequate considering the performance context in MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL). The bank did not make any community development loans in MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) during the evaluation period. However, this assessment area was only recently added to M&T's overall assessment areas in 2011. The market is also highly competitive with 59 banking institutions that include many large regional banking institutions.

### INVESTMENT TEST

M&T made an adequate level of qualified community development investments and grants in MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL), with \$2.1 million of qualified investments dedicated to activities inside MD 48424, as shown in the table to the right. Total qualified investments made in the State of Florida accounted for less than 1.0% of M&T's total investments. Of the investments made in MD 48424, 2.0% were new investments made in the current evaluation period.

QUALIFIED INVESTMENTS		
Purpose	#	\$('000s)
Affordable Housing	3	\$64
Community Services	3	\$12
Economic Development	1	\$2,000
<b>Total</b>	<b>7</b>	<b>\$2,076</b>

M&T exhibited good responsiveness to the credit and community development needs of the assessment area, with investment activities primarily targeting economic development and a smaller part supporting affordable housing. Of the total investments, only 2.0% were MBS, which are viewed qualitatively as less responsive to community development needs of LMI communities than more direct investments. The bank made rare use of innovative or complex investments to support community development initiatives.

Qualified Investments also included multiple grants totaling \$32,000 to organizations that support affordable housing and community services to LMI individuals.

### SERVICE TEST

M&T's performance under the service test in MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) was adequate based on delivery systems that were reasonably accessible to the bank's geographies and individuals of different income levels in the MD changes in branch

locations that did not adversely affect the accessibility of its delivery systems and provides an adequate level of community development services.

### **Retail Services**

M&T's delivery systems were reasonably accessible to portions of geographies and individuals of different income levels in this assessment area. M&T operated one branch in this assessment area, which was located in a middle-income area. This compares unfavorably to the 30.9% of the MD's population residing in LMI areas.

Alternative delivery systems did not enhance the bank's performance in this assessment area group. M&T did not have any off-site ATM locations in the assessment area.

Changes in branch locations generally did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in this assessment area.

Hours and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies or LMI individuals. The one branch located in the MD is not in an LMI area and does not have early morning, late evening hours, or Saturday hours.

### **Community Development Services**

M&T provided an adequate level of community development services during the evaluation period. While the bank did not provide any community development services in this assessment area, management and staff served as board members for seven nonprofit and community based organizations in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area.



## STATE OF MASSACHUSETTS

### ***CRA RATING FOR MASSACHUSETTS<sup>12</sup>: SATISFACTORY***

***The Lending test is rated: Low Satisfactory***

***The Investment test is rated: Low Satisfactory***

***The Service test is rated: Low Satisfactory***

The major factors supporting the rating include:

- An adequate level of qualified investments;
- Adequate responsiveness to assessment area credit needs;
- Good geographic distribution of loans in the bank's assessment area;
- Poor distribution of loans among individuals of different income levels and businesses of different sizes;
- Reasonably accessible delivery systems to geographies and borrowers of different income levels; and,
- An adequate level of community development lending.

### **SCOPE OF EXAMINATION**

Examiners evaluation of M&T's activities in the State of Massachusetts consisted of a full-scope review of MD 14484 (Boston-Quincy, MA). Activities within the State of Massachusetts were made entirely within MD 14484 (Boston-Quincy, MA). Performance ratings for the State of Massachusetts were based solely on the evaluation conducted of the MD 14484 (Boston-Quincy, MA) assessment area's deposit concentration, lending volumes, and branch office network. As shown in Exhibit 1, this assessment area has a very small proportion of M&T's loans and deposits, representing less than 1.0% of the bank's branches, deposits and loans.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MASSACHUSETTES**

As of December 31, 2013, M&T's operations in the State of Massachusetts are based entirely in MD 14484 (Boston-Quincy, MA). Massachusetts has one of the lowest branch presences and deposit bases as the branches support commercial banking operations. As detailed in Exhibit I on page 10, as of June 30, 2013, lending in the state generated less than 1.0% of M&T's combined HMDA-related and small business loans during the evaluation period.

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<sup>12</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

### **Community Contacts**

As part of the CRA evaluation process, two community contacts were conducted. The first organization serves the housing needs of low-income individuals. The contact identified affordable housing and access to banking for the unbanked as important needs in the community. A second contact with an organization specializing in workforce development identified the need for increased employment opportunities for the unemployed, and felt that workforce development was an important tool to give the unemployed and underemployed the skills to access higher paying jobs.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS**

Conclusions regarding M&T's performance in Massachusetts with respect to the lending, investment, and service tests are based solely on performance in the MD 14484 (Boston-Quincy, MA) assessment area. M&T's performance with respect to lending, investment, and service tests are generally below the overall conclusions for the bank. Performance under the lending, investment, and service tests are all rated low satisfactory. Conclusions for the State of Massachusetts had little impact on the overall conclusions for the bank. Specific comments regarding the lending, investment and service tests are discussed below.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD 14484 (BOSTON-QUINCY, MA)**

MD 14484 (Boston-Quincy, MA) is located in east Massachusetts and consists of Norfolk and Suffolk Counties. Norfolk County includes 28 eastern Massachusetts communities, mostly located to the south and west of the City of Boston. Suffolk County has four cities; Chelsea, Revere, Winthrop, and Boston which is the county seat. The MD is a competitive marketplace where large super-regional banks compete with community banks, savings and loan associations, and non-financial institutions. As of June 30, 2013, M&T operated two branches with no deposits that primarily support commercial banking operations in MD 14484 (Boston-Quincy, MA).

### **PERFORMANCE CONTEXT**

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

Demographic Characteristics

According to the 2010 Census, MD 14484 (Boston-Quincy, MA) had a population of roughly 1.1 million and is estimated to have increased slightly to 1.4 million as of 2013 year end. The MD's population is spread throughout Norfolk and Suffolk Counties with populations of 670,850 and 722,023, respectively.

Income Characteristics

As shown in the table to the right, the FFIEC-adjusted MFI figures for MD 14484 (Boston-Quincy, MA) are summarized. The 2010 Census indicates that 41.0% of families in the MD are designated as LMI. Families living below the poverty level represented 9.4% of the total families in the assessment area.

FFIEC MEDIAN FAMILY INCOME		
Area	2012	2013
MD 14484	\$88,800	\$88,000

Housing Characteristics

According to the 2010 Census, the MD 14484 (Boston-Quincy, MA) contained 579,951 housing units. One-to-four family units comprised only 67.2% of the housing units, while five or more family units comprised 32.7%. As shown in the table to the right, according to NAR, the median sales price for existing single-family homes increased by approximately 7.0% from 2012 to 2013. In addition, almost 48.9% of housing units in the MD are owner-occupied and only 18.5% of owner-occupied units are in LMI tracts.

AVERAGE HOME PRICE		
Area	2012	2013
MD 14484	\$351,200	\$375,900

Therefore, rental units play an important role in housing for the MD 14484 (Boston-Quincy, MA) as 44.1% of housing is rentals. The median rent is approximately \$1,189 and close to 49.0% of renters pay more than 30.0% of their income for rent. Thus, housing affordability is a significant issue for some lower income residents.

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 76,316 businesses in 2013, of which 87.0% were small businesses with GAR of \$1 million or less.

As shown in the table to the right, unemployment in MD 14484 (Boston-Quincy, MA) increased during the evaluation period. However, the unemployment rate in Boston is below that of the State of Massachusetts.

AVERAGE ANNUAL UNEMPLOYMENT RATES		
Area	2012	2013
MD 14484	6.1%	6.4%
State of Massachusetts	6.8%	7.1%

Education and health services is the largest employment sector in the MD with roughly 541,400 employees, while the professional and business services is the second largest employment sector with approximately 451,300 employees. Trade, transportation, and utilities, and local government are also major employment sectors in MD 14484 (Boston-Quincy, MA).

Additional performance context data for this assessment area is provided in the MD 14484 (Boston-Quincy, MA) Assessment Area Demographics table below.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MD 14484</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	55	16.5	39,617	12.9	12,016	30.3	77,903	25.3
Moderate-income	64	19.2	54,615	17.8	7,817	14.3	48,214	15.7
Middle-income	101	30.2	108,866	35.4	6,088	5.6	57,517	18.7
Upper-income	102	30.5	104,534	34.0	2,920	2.8	124,019	40.3
Unknown-income	12	3.6	21	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>334</b>	<b>100.0</b>	<b>307,653</b>	<b>100.0</b>	<b>28,841</b>	<b>9.4</b>	<b>307,653</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	76,694	14,352	5.1	18.7	55,436	72.3	6,906	9.0
Moderate-income	113,427	38,179	13.5	33.7	65,158	57.4	10,090	8.9
Middle-income	203,721	110,015	38.8	54.0	80,993	39.8	12,713	6.2
Upper-income	186,030	120,825	42.6	64.9	54,097	29.1	11,108	6.0
Unknown-income	79	55	0.0	69.6	24	30.4	0	0.0
<b>Total Assessment Area</b>	<b>579,951</b>	<b>283,426</b>	<b>100.0</b>	<b>48.9</b>	<b>255,708</b>	<b>44.1</b>	<b>40,817</b>	<b>7.0</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	6,787	8.9	5,793	8.7	642	9.3	352	11.5
Moderate-income	9,281	12.2	8,197	12.4	631	9.2	453	14.8
Middle-income	22,456	29.4	19,805	29.8	1,837	26.7	814	26.6
Upper-income	37,388	49.0	32,296	48.7	3,662	53.2	1,430	46.7
Unknown-income	404	0.5	276	0.4	112	1.6	16	0.5
<b>Total Assessment Area</b>	<b>76,316</b>	<b>100.0</b>	<b>66,367</b>	<b>100.0</b>	<b>6,884</b>	<b>100.0</b>	<b>3,065</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>87.0</b>		<b>9.0</b>		<b>4.0</b>

Based on 2010 ACS Information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD 14484 (BOSTON-QUINCY, MA)**

### **LENDING TEST**

M&T's performance under the lending test in meeting the credit needs of its assessment area in the State of Massachusetts was adequate. This conclusion is based on adequate lending activity performance, good geographic distribution performance, poor borrower distribution performance, and an adequate level of community development loans. Since the MD 14484 (Boston-Quincy, MA) assessment area was added to M&T in 2013, lending test performance was only based on the bank's performance in 2013. Some of the data used to evaluate M&T's performance in this MD assessment area appears in Appendices E, G, and H.

#### **Lending Activity**

M&T's responsiveness to retail credit needs in the MD 14484 (Boston-Quincy, MA) was adequate. Since the MD recently became a part of M&T's assessment areas, at the time of this performance evaluation, trend and market share information was not available.

#### **Geographic Distribution**

M&T's overall geographic distribution of home purchase, refinance, and small business loans reflects good penetration in the MD 14484 (Boston-Quincy, MA) assessment area. Home improvement lending was not evaluated as the volume of lending was insufficient to analyze. Lending penetration in LMI geographies was good for home purchase lending, excellent for refinance lending, and poor for small business lending.

Because the MD 14484 (Boston-Quincy, MA) assessment area originated less than 1.0% of the bank's total loan originations during the review period, and the bank maintained a limited presence in this assessment area, a lending penetration table was not included.

#### *Home Purchase*

M&T's home purchase lending in low-income census tracts was excellent. In 2013, M&T made 8.3% (3 loans) and 8.0% of dollar volume of its home purchase loans in low-income census tracts while 5.1% of owner-occupied housing units are located in low-income census tracts. M&T's home purchase performance was above the aggregate which made 5.8% by number and 5.2% by dollar volume of its home purchase loans in low-income census tracts.

Home purchase lending in moderate-income census tracts was good. In 2013, M&T made 4 of 36 home purchase loans (11.1% by number and 11.7% by dollar volume) in moderate-income census tracts. M&T's performance was below the demographics which indicated that 13.5% of owner-occupied housing units were located in moderate-income census tracts and also was

below the aggregate which made 14.0% by number and 11.3% by dollar volume of its home purchase loans in moderate-income census tracts.

### *Refinance*

Refinance lending in low-income census tracts was excellent. In 2013, M&T made four of 59 refinance loans or 6.8% of its refinance loans in low-income census tracts. Refinance performance was above the demographic which indicated that 5.1% of owner occupied-housing units were located in low-income census tracts and above the aggregate's performance which made 5.0% by number and 4.4% by dollar volume of its refinance loans in low-income census tracts. Opportunities for lending in low-income tracts are limited as 30.3% of families in low-income census tracts have incomes below the poverty level.

M&T's refinance lending in moderate-income census tracts was excellent. In 2013, M&T made 12 refinance loans or 20.3% and 18.8% by dollar volume in moderate-income census tracts which were above the demographics which indicated that 13.5% of owner-occupied housing units were located in moderate-income census tracts. M&T's refinance performance was above the aggregate's performance which made 11.8% by number and 10.0% by dollar volume in moderate-income census tracts.

### *Small Business*

Small business performance in low-income census tracts was poor. In 2013, M&T did not originate any of its small business loans in low-income census tracts while 8.9% of small businesses are located in low-income census tracts. The aggregate also made 7.0% of its small business loans in low-income census tracts. Small business performance in 2012 was comparable to 2013's performance

M&T's small business loan performance in moderate-income census tracts in 2013 was adequate. M&T originated 9.1% of its small business loans (2 loans) in moderate-income census tracts, which was below the aggregate's performance of 11.2% by number and 10.3% by dollar volume of small business loans in moderate-income census tracts. Small business lending was also below the demographics, which indicate that 12.2% of businesses are located in moderate-income census tracts

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in the MD 14484 (Boston-Quincy, MA) assessment area reflects poor penetration. Overall, lending to LMI borrowers and small businesses was poor. Home improvement lending was not evaluated as the volume was insufficient to analyze. Consideration was given for the bank expanding its presence into the assessment area during the review period.

### *Home Purchase*

M&T's home purchase lending to LMI borrowers was poor. M&T did not make any home purchase loans to low- or moderate-income borrowers when 25.3% and 15.7% of families in the MD assessment area are of LMI respectively. Home purchase performance was below the performance of the aggregate which made 3.2% and 16.6% of its home purchase loans to LMI borrowers respectively

### *Refinance*

Refinance lending to LMI borrowers was poor. Refinance lending to low-income borrowers was poor as the bank made one loan (1.7%) of its refinance loans to low-income borrowers. This compares to the 25.3% of families in the MD assessment area which are low-income. Performance was below the aggregate which made 4.0% by number and 2.1% by dollar volume of its refinance loans to low-income borrowers.

Refinance lending to moderate-income borrowers was poor as the bank made two loans (3.4%) of its refinance loans to moderate-income borrowers. This compares to the 15.7% of families in the MD assessment area which are moderate-income. Performance was below the aggregate which made 12.8% by number and 8.3% by dollar volume to moderate-income borrowers.

### *Small Business Lending*

M&T's performance in lending to small business borrowers with GAR of \$1 million or less was poor. In 2013, the bank made 22 loans, none of which were business loans to businesses with GAR of \$1 million or less, and 87.0% of these business establishments in the MD have GAR of \$1 million or less. Consideration however, was given as the bank expanded its presence into the MD during the review period.

### **Community Development Lending**

M&T made an adequate level of community development lending activity in MD 14484 (Boston-Quincy, MA) with eight new loan originations totaling \$62.7 million, or 1.7% of the bank's community development lending. Performance within the MD was directed at affordable housing (59.0%), and community service initiatives (41.0%). Additionally, \$4 million in community development loans were made outside of the assessment area within the State of Massachusetts.

Examples of community development initiatives included:

- A \$13.6 million loan to finance renovations to a nursing home housing a majority LMI population as the majority of revenues came from Medicaid.

## **INVESTMENT TEST**

M&T made an adequate level of qualified community development investments and grants in MD 14484 (Boston-Quincy, MA). One investment was made in the assessment area totaling \$2 million, which accounted for less than 1.0% of M&T's total investments.

The bank exhibited adequate responsiveness to the credit and community development needs of the assessment area and made rare use of innovative or complex investments to support community development initiatives. The bank made an academic tax credit bond that supported the renovation of a charter school located in a moderate-income tract in Suffolk County, MA. A majority of the students qualify for the free or reduced lunch program.

## **SERVICE TEST**

M&T's performance under the service test in MD 14484 (Boston-Quincy, MA) was adequate considering that the bank was operating in MD 14484 since only February of 2013. Two branches were opened in middle-income areas to support commercial banking operations. No community development services were reported.



## STATE OF CONNECTICUT

### ***CRA RATING FOR CONNECTICUT<sup>13</sup>: SATISFACTORY***

*The Lending test is rated: Low Satisfactory*

*The Investment test is rated: Low Satisfactory*

*The Service test is rated: Low Satisfactory*

The major factors supporting the rating include:

- Excellent geographic distribution of loans in the bank's assessment area;
- Adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- Adequate responsiveness to assessment area credit needs;
- An adequate level of community development lending; and
- An adequate level of qualified investments.

### **SCOPE OF EXAMINATION**

Examiners evaluation of M&T's activities in the State of Connecticut consisted of a full-scope review of MSA 14860 (Bridgeport-Stamford-Norwalk, CT). Activities within the State of Connecticut were made entirely within MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area's deposit concentrations, lending volumes, and branch office network. As shown in Exhibit I on page 10, this assessment area has a very small proportion of M&T's loans and deposits. M&T maintains one commercial banking facility in the State of Connecticut; however, it is not a retail branch and it does not take deposits.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN CONNECTICUT**

The State of Connecticut assessment area maintained a low level of deposit base and branch presence. As detailed in Exhibit I on page 10, M&T maintained no deposits and only operated one commercial banking facility in the State of Connecticut. Total HMDA lending and small business lending was approximately 1.0% of M&T's total lending.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT**

Conclusions regarding M&T's performance in Connecticut with respect to the lending, investment, and service tests are solely based on performance in MSA 14860 (Bridgeport-

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<sup>13</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

Stamford-Norwalk, CT). M&T's performance under the lending test, investment test, and service test is rated low satisfactory. The overall conclusions were only slightly influenced by the performance in Connecticut which has 1.0% of loan originations and no deposits. Specific comments regarding the lending, investment, and service tests are discussed below.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)**

MSA 14860 (Bridgeport-Stamford-Norwalk, CT) is located in south west Connecticut and consists of Fairfield County. The MSA is a competitive marketplace where large super-regional banks compete with community banks, savings and loan associations, and non-financial institutions. Based on the summary of deposits reported to the FDIC as of June 30, 2013, M&T operates one commercial banking facility in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) and ranks last in the assessment area with no deposits.

### **PERFORMANCE CONTEXT**

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the DOL, Dun & Bradstreet, FFIEC, HUD, and NAR.

#### *Demographic Characteristics*

According to the 2010 Census, MSA 14860 (Bridgeport-Stamford-Norwalk, CT) had a population of 916,829 and is estimated to have increased by 2.5% to 939,904 as of July 1, 2013. Bridgeport, the most populous city in the State of Connecticut, is located on Long Island Sound.

#### *Income Characteristics*

As shown in the table to the right, the HUD-adjusted MFI figures for the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) are summarized. The 2010 Census indicates that 39.0% of families in the MSA are designated as LMI. Families living below the poverty level represented 5.6% of the total families in the assessment area.

<b>FFIEC MEDIAN FAMILY INCOMES</b>		
<b>Area</b>	<b>2012</b>	<b>2013</b>
MSA 14860	\$106,700	\$101,300

Housing Characteristics

According to the 2010 Census, MSA 14860 (Bridgeport-Stamford-Norwalk, CT) contained 358,132 housing units. One-to-four family units comprised 82.0% of the housing units, while five or more family units comprised 18.0%. While 65.5% of housing units in the MSA are owner-occupied, only 21.1% of owner-occupied units are in LMI tracts. According to NAR, the median sales price for existing single-family homes increased by approximately 3.0% from 2012 to 2013, which is reflected in the table above. In addition, the median rent is approximately \$1,206 and close to 50.0% of renters pay more than 30.0% of their income for rent. Thus, housing affordability is a significant issue for some lower income residents.

AVERAGE HOME PRICE		
Area	2012	2013
MSA 14860	\$390,500	\$403,000

Labor, Employment and Economic Characteristics

According to Dun & Bradstreet data, the assessment area had a total of 70,080 businesses in 2013, of which 90.0% were small businesses with GAR of \$1 million or less.

As shown in the table to the right, unemployment in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) decreased during the evaluation period, as shown in the table at right.

AVERAGE ANNUAL UNEMPLOYMENT RATES		
Area	2012	2013
MSA 14860	7.7%	7.2%
State of Connecticut	8.3%	7.8%

Also, the unemployment rate in Bridgeport is below that of the State of Connecticut.

Trade, transportation, and utilities is the largest employment sector in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) with roughly 74,200 employees, while the professional and business services is the second largest employment sector with approximately 71,300 employees. Education and health services and local government are also major employment sectors in MSA 14860 (Bridgeport-Stamford-Norwalk, CT).

Additional performance context data for this assessment area is provided in the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Assessment Area Demographics table on the next page.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 14860</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	33	15.6	26,630	11.6	5,731	21.5	52,329	22.7
Moderate-income	37	17.5	41,310	17.9	4,096	9.9	38,409	16.7
Middle-income	67	31.8	81,232	35.2	1,736	2.1	46,025	20.0
Upper-income	73	34.6	81,389	35.3	1,320	1.6	93,798	40.7
Unknown-income	1	0.5	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>211</b>	<b>100.0</b>	<b>230,561</b>	<b>100.0</b>	<b>12,883</b>	<b>5.6</b>	<b>230,561</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	49,441	12,193	5.2	24.7	30,431	61.6	6,817	13.8
Moderate-income	75,911	37,237	15.9	49.1	32,698	43.1	5,976	7.9
Middle-income	123,873	94,583	40.3	76.4	22,564	18.2	6,726	5.4
Upper-income	108,907	90,406	38.6	83.0	11,670	10.7	6,831	6.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>358,132</b>	<b>234,419</b>	<b>100.0</b>	<b>65.5</b>	<b>97,363</b>	<b>27.2</b>	<b>26,350</b>	<b>7.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	7,114	10.2	6,136	9.7	648	14.2	330	15.4
Moderate-income	10,976	15.7	9,665	15.3	897	19.7	414	19.3
Middle-income	23,218	33.1	21,077	33.3	1,441	31.6	700	32.7
Upper-income	28,772	41.1	26,499	41.8	1,574	34.5	699	32.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>70,080</b>	<b>100.0</b>	<b>63,377</b>	<b>100.0</b>	<b>4,560</b>	<b>100.0</b>	<b>2,143</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.4</b>		<b>6.5</b>		<b>3.1</b>

Based on 2010 ACS Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)

### LENDING TEST

M&T's performance under the lending test in meeting the credit needs of its assessment area in the State of Connecticut was adequate. This conclusion is based on adequate lending activity performance, excellent geographic distribution performance, poor borrower distribution performance, and an adequate level of community development loans. Since the Connecticut

assessment area was added to M&T in 2013, lending test performance was only based on the bank's performance in 2013. Some of the data used to evaluate M&T's performance in this MSA assessment area appears in Appendices E, G, and H.

### **Lending Activity**

M&T's responsiveness to retail credit needs in the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) was adequate. Since the MSA has recently become part of the M&T's assessment area, at the time of this performance evaluation, trend and market share information was not available.

### **Geographic Distribution**

M&T's overall geographic distribution of home purchase, refinance, and small business loans reflects excellent penetration in the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area. Home improvement lending was not evaluated as the volume of lending was insufficient to analyze. In 2013, M&T made a total of three home improvement loans.

Because the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area originated less than 1.0% of the bank's total loan originations during the review period, and the bank maintained a limited presence in this assessment area, a lending penetration table was not included.

#### *Home Purchase*

M&T's home purchase lending in low-income census tracts was poor. In 2013, M&T made 2.4% by number and 1.1% by dollar volume of its home purchase loans in low-income census tracts while 5.2% of owner-occupied housing units are located in low-income census tracts. M&T's home purchase performance was below the aggregate which made 3.7% by number and 1.6% by dollar volume of its home purchase loans in low-income census tracts.

Home purchase lending in moderate-income census tracts was excellent. In 2013, M&T made 22.4% by number and 14.7% by dollar volume of its home purchase loans in moderate-income census tracts which was above the demographics which indicated that 15.9% of owner-occupied housing units were in moderate-income census tracts. M&T's home purchase performance was also above the aggregate which made 14.7% by number and 6.9% by dollar volume of its home purchase loans in moderate-income census tracts

#### *Refinance*

Refinance lending in low-income census tracts was excellent. In 2013, M&T made 9.0% by number and 6.1% by dollar volume of its refinance loans in low-income census tracts. Refinance performance was above the demographic which indicated 5.2% of owner occupied-housing units were in low-income census tracts and above the aggregate's performance which made 3.0% by number and 1.3% by dollar volume of its refinance loans in low-income census tracts.

Opportunities for lending in low-income tracts are limited as 21.5% of families in low-income census tracts have incomes below the poverty level.

M&T's refinance lending in moderate-income census tracts was excellent. In 2013, M&T made 26.9% by number and 18.5% by dollar volume of its refinance loans in moderate-income census tracts which were above the demographic which indicated 15.9% of owner-occupied housing units were in moderate-income census tracts and above the aggregate which made 11.6% by number and 7.3% by dollar volume of its refinance loans in moderate-income census tracts.

### *Small Business*

M&T's small business loan performance in 2013 was excellent based on excellent performance in LMI census tracts. In 2013, M&T originated 3 of 23 (13.0% by number and 7.6% by dollar volume) small business loans in low-income census tracts while 10.2% of small businesses operate in low-income census tracts. The aggregate made 8.1% by number and 11.3% by dollar volume of its small business loans in low-income census tracts. In 2013, M&T originated 21.7% by number and 32.4% by dollar volume of its small business loans in moderate-income census tracts, which was above the aggregate's performance of 15.4% by number and 19.5% by dollar volume of small business loans in moderate-income census tracts. Small business lending was also above the demographics, with 15.7% of businesses located in moderate-income census tracts.

### **Distribution by Borrower Income and Revenue Size of Business**

M&T's distribution of lending among customers of different income levels and businesses of different sizes in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area reflects poor penetration. Overall, lending to LMI borrowers was poor while small businesses lending was adequate. Home improvement lending was not evaluated as the volume was insufficient to analyze. Consideration was given for the bank expanding its presence into the assessment area during the review period.

### *Home Purchase*

The overall distribution of home purchase loans was poor based on poor distribution to LMI borrowers. M&T's home purchase lending to low-income borrowers was poor. M&T made two of its home purchase loans (2.4% by number and less than 1.0% by dollar volume) to low-income borrowers when 22.7% of families in the MSA assessment area are of low-income. Home purchase performance was below the performance of the aggregate which made 7.6% by number and 2.3% by dollar volume of its home purchase loans to low-income borrowers.

Home purchase lending to moderate-income borrowers was poor. M&T made two of its home purchase loans, which equals 2.4% by number and 1.5% by dollar volume to moderate-income borrowers when 16.7% of families in the MSA 14860 (Bridgeport-Stamford-Norwalk, CT)

assessment area are of moderate-income. Home purchase performance was below the aggregate which made 17.2% by number and 8.2% by dollar volume of its home purchase loans to moderate-income borrowers.

### *Refinance*

The overall distribution of refinance loans was poor based on poor distribution to LMI borrowers. Refinance lending to low-income borrowers was poor as the bank made one loan (1.5% by number and less than 1.0% by dollar volume) of its refinance loans to low-income borrowers. This compares to the 16.7% of families in the MSA assessment area which are of moderate-income. Performance however, was below the aggregate which made 6.5% by number and 2.5% by dollar volume its refinance loans to low-income borrowers.

Refinance lending to moderate-income borrowers was poor as the bank made two loans (3.0% by number and 2.4% by dollar volume) of its refinance loans to moderate-income borrowers. This compares to the 16.7% of families in the MSA assessment area which are of moderate-income. Performance however, was below the aggregate which made 13.6% by number and 6.3% by dollar volume its refinance loans to moderate-income borrowers.

### *Small Business Lending*

M&T provided an adequate level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 52.2% by number and 32.7% by dollar volume of its small business loans to these businesses, compared to the 90.4% of business establishments in the MSA with GAR of \$1 million or less. Small business lending was above the aggregate, which made 47.7% by number and 32.9% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank made 34.5% of its small business loans in amounts of \$100,000 or less, which was below the aggregate's 93.9% of small business loans in amounts of \$100,000 or less; however, the aggregate includes credit card lender who offers small dollar credit facilities.

### Community Development Lending

As shown in the table to the right, M&T made an adequate level of community development lending activity in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) with six new loan originations totaling \$34.1 million, or less than 1.0% of the bank's community development lending. Performance within the MSA was directed at affordable housing (30.0%) and community service initiatives (25.0%) and revitalization and stabilization activity (45.0%).

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	2	\$10,279
Community Services	3	\$8,644
Economic Development	0	\$0
Revitalize and Stabilize	1	\$15,250
<b>Total</b>	<b>6</b>	<b>\$34,173</b>

An example of community development lending included a \$13.6 million loan to finance renovations to a nursing home housing a majority LMI population as the majority of revenues came from Medicaid.

### INVESTMENT TEST

As shown in the table to the right, M&T's performance in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) under the investment test was rated low satisfactory.

<b>QUALIFIED INVESTMENTS</b>		
<b>Purpose</b>	<b>#</b>	<b>\$('000s)</b>
Affordable Housing	3	\$6,765
<b>Total</b>	<b>3</b>	<b>\$6,765</b>

M&T made an adequate level of qualified community development investments and grants in MSA 14860 (Bridgeport-Stamford-Norwalk, CT), with \$6.8 million of qualified investments dedicated to activities inside MSA 14860 (Bridgeport-Stamford-Norwalk, CT). Total qualified investments made in the State of Connecticut accounted for 1.0% of M&T's total investments. M&T's level of qualified investments compared favorably to that of similarly-situated large retail banks operating in the assessment area.

M&T made extensive use of complex investments to support community development initiatives. Almost all of the investments in the State of Connecticut were made in LIHTC projects supporting affordable housing for LMI individuals. M&T also exhibited adequate responsiveness to the credit and community development needs of the assessment area. Qualified investments in the State of Connecticut also included multiple grants totaling \$21,000 to organizations that promote affordable housing.

### SERVICE TEST

M&T's performance under the service test in MSA 14860 (Bridgeport-Norwalk-Stamford, CT) was adequate considering that the bank was only in MSA 14860 (Bridgeport-Norwalk-Stamford, CT) since March of 2013. One commercial banking facility was opened in a middle-income area to support commercial banking operations. No community development services were reported.



**CRA APPENDIX A**  
**SCOPE OF EXAMINATION**

<b>SCOPE OF EXAMINATION</b>			
<b>TIME PERIOD REVIEWED</b>	January 1, 2012 – August 31, 2014 Lending: January 1, 2012 – December 31, 2013 Community development lending, qualified investments, and community development services: July 1, 2012 – August 31, 2014		
<b>FINANCIAL INSTITUTION</b>			<b>PRODUCTS REVIEWED</b>
<b>Manufacturers and Traders Trust Company</b>  One M & T Plaza * Buffalo, NY 14203			<ul style="list-style-type: none"> <li>• Home purchase</li> <li>• Multifamily</li> <li>• Refinance</li> <li>• Home Improvement</li> <li>• Small business</li> <li>• Community Development</li> </ul>
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
M&T Real Estate Trust	Bank subsidiary		<ul style="list-style-type: none"> <li>• Multifamily</li> </ul>
M&T Realty Capital Corporation	Bank subsidiary		<ul style="list-style-type: none"> <li>• Multifamily</li> </ul>
* Branch Examined			

**LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION**

<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
<b>MULTISTATE MSA</b>			
MSA 37980 (Philadelphia-Camden-Wilmington, PA- NJ-DE-MD)	Full Scope Procedures		
MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA)	Full Scope Procedures		
MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	Full Scope Procedures		
MSA 19060 (Cumberland, MD-WV)	Full Scope Procedures		
<b>STATE OF NEW YORK</b>			
MSA 15380 (Buffalo-Niagara Falls, NY)	Full Scope Procedures		
MSA 40380 (Rochester, NY)	Full Scope Procedures		
MSA 45060 (Syracuse, NY)	Full Scope Procedures		
MSA 13780 (Binghamton, NY)	Full Scope Procedures		
MSA 10580 (Albany-Schenectady-Troy, NY)	Limited Scope Procedures		
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	Limited Scope Procedures		
MSA 46540 (Utica-Rome, NY)	Limited Scope Procedures		
MSA 28740 (Kingston, NY)	Limited Scope Procedures		
MSA 27060 (Ithaca, NY)	Limited Scope Procedures		
MSA 21300 (Elmira, NY)	Limited Scope Procedures		
NY Nonmetropolitan Group A (Allegany, Cattaraugus, Chautauqua, etc.)	Limited Scope Procedures		
NY Nonmetropolitan Group B (Cayuga, Seneca, Cortland, Chenango)	Limited Scope Procedures		
NY Nonmetropolitan Group C (Sullivan County)	Limited Scope Procedures		
NY Nonmetropolitan Group D (Jefferson County)	Limited Scope Procedures		
<b>STATE OF MARYLAND</b>			
MSA 12580 (Baltimore-Towson, MD)	Full Scope Procedures		
MSA 41540 (Salisbury, MD)	Limited Scope Procedures		
MSA 25180 (Hagerstown-Martinsburg, MD-WV)	Limited Scope Procedures		
MD Nonmetropolitan Group A (Caroline, Dorchester, and Talbot Counties)	Limited Scope Procedures		
MD Nonmetropolitan Group B (St. Mary's County)	Limited Scope Procedures		
MD Nonmetropolitan Group C (Worcester County)	Limited Scope Procedures		
MD Nonmetropolitan Group D (Garrett County)	Limited Scope Procedures		
<b>STATE OF PENNSYLVANIA</b>			
MSA 49620 (York-Hanover, PA)	Full Scope Procedures		
MSA 25420 (Harrisburg-Carlisle, PA)	Full Scope Procedures		
MSA 42540 (Scranton—Wilkes-Barre, PA)	Full Scope Procedures		
PA Nonmetropolitan Group A (Bradford, Columbia, Montour, Northumberland, etc.)	Full Scope Procedures		
MSA 11020 (Altoona, PA)	Full Scope Procedures		
MSA 39740 (Reading, PA)	Limited Scope Procedures		
MSA 44300 (State College, PA)	Limited Scope Procedures		
MSA 29540 (Lancaster, PA)	Limited Scope Procedures		
MSA 48700 (Williamsport, PA)	Limited Scope Procedures		
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	Limited Scope Procedures		
MSA 30140 (Lebanon, PA)	Limited Scope Procedures		
PA Nonmetropolitan Group B (Monroe County)	Limited Scope Procedures		
PA Nonmetropolitan Group C (Adams, Bedford, Franklin, and Huntingdon Counties)	Limited Scope Procedures		

<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
PA Nonmetropolitan Group D (Clearfield and Clinton Counties)	Limited Scope Procedures		
<b>STATE OF DELAWARE</b>			
DE Nonmetropolitan Area (Sussex County)	Full Scope Procedures		
MSA 20100 (Dover, DE)	Limited Scope Procedures		
<b>STATE OF VIRGINIA</b>			
MSA 40060 (Richmond, VA)	Full Scope Procedures		
<b>STATE OF FLORIDA</b>			
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	Full Scope Procedures		
<b>STATE OF MASSACHUSETTS</b>			
MD 14484 (Boston-Quincy, MA)	Full Scope Procedures		
<b>STATE OF CONNECTICUT</b>			
MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	Full Scope Procedures		

**CRA APPENDIX B**

**SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS**

<b>State or Multistate Metropolitan Area</b>	<b>Lending Test Rating</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall State Rating</b>
<b>Multistate MSA Ratings</b>				
Multistate MSA 37980	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Multistate MSA 35620	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Multistate MSA 47900	Outstanding	Outstanding	Outstanding	Outstanding
Multistate MSA 19060	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
<b>State MSA Ratings</b>				
State of New York	High Satisfactory	Outstanding	Outstanding	Outstanding
State of Maryland	High Satisfactory	Outstanding	Outstanding	Outstanding
State of Pennsylvania	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
State of Delaware	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Virginia	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
State of Florida	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Massachusetts	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Connecticut	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
<b>OVERALL</b>	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>

## CRA APPENDIX C

### GLOSSARY

**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 metropolitan area/assessment area.

**Census tract:** A small, relatively permanent statistical subdivision of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographic staff of a regional census center in accordance with Census Bureau guidelines. Designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions at the time they are established, census tracts generally contain between 1,000 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries are delineated with the intention of being stable over many decades, so they generally follow relatively permanent visible features. However, they may follow governmental unit boundaries and other invisible features in some instances; the boundary of a state or county (or statistically equivalent entity) is always a census tract boundary.

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies or services that (i) Support, enable or facilitate projects or activities that meet eligible uses" criteria described in Section 2301c of the Housing and Economic Recovery Act of 2008 ("HERA"), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Urban and Development in accordance with the Neighborhood Stabilization program ("NSP"); (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by the grantees; (iii) Benefit low-, moderate- and middle-income individuals and geographies in the bank's assessment area(s) or geographies outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

- a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.
- (iv) activities that revitalize or stabilize low- or moderate-income geographies; or loans, investments or services that (i) Support, enable or facilitate projects or activities that meet eligible uses" criteria described in Section 2301c of the Housing and Economic Recovery Act of 2008 ("HERA"), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Urban and Development in accordance with the Neighborhood Stabilization program ("NSP"); (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by the grantees; (iii) Benefit low-, moderate- and middle-income individuals and geographies in the bank's assessment area(s) or geographies outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Family:** A family is a group of two or more people related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

**Full review:** Performance is analyzed considering performance context, quantitative factors and qualitative factors.

**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 income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancings of home improvement and home purchase loans.

**Household:** A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household. The count of households excludes group quarters.

**Limited-scope review:** Performance is analyzed using only quantitative factors.

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

**Metropolitan Statistical Area (“MSA”):** A geographic entity defined by the federal Office of Management and Budget for use by federal statistical agencies, based on the concept of a core area with a large population nucleus, plus adjacent communities having a high degree of economic and social integration with that core.

**Metropolitan Division:** A county or group of counties within a **Metropolitan Statistical Area** that contains a population of at least 2.5 million and represents an employment center(s) associated through commuting ties.

**Middle-income:** Individual income that is at least 80% and less than 120% of the area median income, or a MFI 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 MFI 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.

**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.

APPENDIX D

SUMMARY OF BRANCH LOCATIONS

MULTI STATE	Total Branches	Total Branches in LMI Tracts	% of Branches in LMI Tracts	% of Pop. in LMI Tract
<b>MULTI-STATE (PA-NJ-DE)</b>				
MSA 37980 (Phila-Camden-Wilmington, PA, NJ, DE)	47	10	21%	33%
<b>MULTI-STATE (NY-NJ)</b>				
MSA 35620 (NY-NJ)	35	4	11%	35%
<b>MULTI-STATE (WASHINGTON, DC-VA-MD-WV)</b>				
MSA 47900 (Washington,DC-VA-MD-WV)	77	29	38%	33%
<b>MULTI-STATE (MD-WV)</b>				
MSA 19060 (Cumberland, MD-WV)	8	4	50%	18%
<b>NEW YORK STATE</b>				
MSA 15380 (Buffalo - Niagara Falls)	51	15	29%	27%
MSA 40380 (Rochester)	32	5	16%	24%
MSA 45060 (Syracuse)	29	6	21%	27%
MSA 13780 (Binghamton)	14	4	29%	19%
MSA 10580 (Albany-Schnectady-Troy)	14	3	21%	24%
MSA 39100 (Poughkeepsie-Newburgh-Middletown)	19	4	21%	23%
MSA 28740 (Kingston)	6	2	33%	12%
MSA 27060 (Ithaca)	3	1	33%	18%
MSA 46540 (Utica Rome)	12	0	0%	21%
MSA 21300 (Elmira)	1	1	100%	33%
NON-MSA NY TOTAL GROUP A ( Allegany, Cattaragus, Chautauqua etc.)	23	2	9%	13%
NON-MSA NY TOTAL GROUP B (Cayuga-Seneca-Cortland-Chenango)	5	0	0%	4%
NON-MSA NY TOTAL GROUP C (Sullivan County)	3	1	33%	22%
NON-MSA NY TOTAL GROUP D (Jefferson County)	1	0	0%	24%
<b>STATE OF NEW YORK TOTAL</b>	<b>213</b>	<b>44</b>	<b>21%</b>	
<b>MARYLAND STATE</b>				
MSA 12580 (Baltimore-Towson)	103	25	24%	31%
MSA 25180 (Hagerstown-Martinsburg)	10	5	50%	21%
MSA 41540 (Salisbury)	4	0	0%	18%
NON-MSA MD TOTAL GROUP A (Caroline-Dorchester-Talbot Counties)	3	2	67%	24%
NON-MSA MD TOTAL GROUP B (St.Mary's County)	1	0	0%	5%
NON-MSA MD TOTAL GROUP C (Worcester County)	2	2	100%	28%
NON-MSA MD TOTALGROUP D (Garrett County)	3	1	33%	56%
<b>STATE OF MARYLAND TOTAL</b>	<b>126</b>	<b>35</b>	<b>28%</b>	
<b>PENNSYLVANIA STATE TOTAL</b>				
MSA 49620 (York-Hanover)	28	3	11%	14%
MSA 25420 (Harrisburg-Carlisle)	25	10	40%	24%
MSA 42540 (Scranton-Wilkes Barre)	14	2	14%	21%
MSA 39740 (Reading)	13	1	8%	22%
MSA 11020 (Altoona)	9	1	11%	14%
MSA 29540 (Lancaster)	7	0	0%	13%
MSA 48700 (Williamsport)	4	0	0%	11%
MSA 44300 (State College)	6	2	33%	17%
MSA 10900 (Allentown-Bethlehem-Easton)	5	3	60%	31%
MSA 30140 (Lebanon)	2	0	0%	12%
NON-MSA PA TOTAL GROUP A (Bradford-Columbia-Northumberland etc.)	27	6	22%	12%
NON-MSA PA TOTAL GROUP B (Monroe)	1	0	0%	0%
NON-MSA PA TOTAL GROUP C (Adams-Franklin-Huntington-Bedford)	14	1	7%	4%
NON-MSA PA TOTAL GROUP D (Clearfield-Clinton)	4	0	0%	17%
<b>STATE OF PENNSYLVANIA TOTAL</b>	<b>159</b>	<b>29</b>	<b>18%</b>	
<b>DELAWARE STATE TOTAL</b>				
MSA 20100 (Dover)	7	2	29%	12%
NON-MSA DE (Sussex County)	15	1	7%	15%
<b>STATE OF DELAWARE TOTAL</b>	<b>22</b>	<b>3</b>	<b>14%</b>	<b>0%</b>
<b>STATE OF VIRGINIA</b>				
MSA 40060 (Richmond, VA)	5	2	40%	35%
<b>STATE OF FLORIDA</b>				
MD 48424 (West Palm Beach)	1	0	0%	31%
<b>STATE OF CONNECTICUT</b>				
MSA 14860 (Bridgeport, CT)	0	0	0%	33%
<b>STATE OF MASSACHUSETTS</b>				
MD 14484 (Boston-Quincy, MA)	0	0	0%	34%
<b>TOTAL BRANCHES</b>	<b>693</b>	<b>160</b>	<b>23%</b>	



APPENDIX E

SUMMARY OF COMMUNITY DEVELOPMENT LENDING

Assessment Area	Affordable Housing		Economic Development		Community Services		Revitalize and Stabilize		Combined Totals	
	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)
<b>Philadelphia-Camden-Wilmington, PA-DE-MD (MSA 37980)</b>										
Philadelphia-Camden-Wilmington, PA-DE-MD	10	38,732	6	11,103	10	18,129	6	123,227	32	191,191
Outside AA NJ	3	36,211	0	0	5	42,185	2	35,346	10	113,742
<b>Philadelphia-Camden-Wilmington, PA-DE-MD Totals</b>	<b>13</b>	<b>74,943</b>	<b>6</b>	<b>11,103</b>	<b>15</b>	<b>60,314</b>	<b>8</b>	<b>158,573</b>	<b>42</b>	<b>304,933</b>
<b>New York-Long Island-Northern New Jersey (MSA 35620)</b>										
New York-Long Island-Northern New Jersey	66	283,684	8	26,171	56	424,690	17	168,031	147	902,576
Outside AA NJ	1	1,248	2	2,304	6	83,556	1	35,500	10	122,608
<b>New York-Long Island-Northern New Jersey Totals</b>	<b>67</b>	<b>284,932</b>	<b>10</b>	<b>28,475</b>	<b>62</b>	<b>508,246</b>	<b>18</b>	<b>203,531</b>	<b>157</b>	<b>1,025,184</b>
<b>Washington-Arlington-Alexandria DC-VA-MD-WV (MSA 47900)</b>										
Washington-Arlington-Alexandria DC-VA-MD-WV Totals	18	84,630	7	22,145	22	117,753	4	131,380	51	355,908
<b>Cumberland, MD-WV (MSA 19060)</b>										
Cumberland, MD-WV Totals	0	0	0	0	0	0	0	0	0	0
<b>New York State</b>										
MSA 15380 (Buf-Niagara Falls, NY)	6	8,980	6	20,385	18	28,896	23	429,452	53	487,713
MSA 40380 (Rochester, NY)	11	65,075	13	37,751	5	12,534	4	5,126	33	120,486
MSA 45060 (Syracuse, NY)	3	5,000	2	2,830	5	24,318	12	180,257	22	212,405
MSA 13780 (Binghamton, NY)	3	272	1	1,017	6	1,762	0	0	10	3,051
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	7	14,236	1	2,164	11	23,803	2	14,212	21	54,415
MSA 10580 (Albany-Schenectady-Troy, NY)	4	10,352	6	37,142	4	30,850	8	111,561	22	189,905
MSA 46540 (Utica-Rome, NY)	4	19,175	0	0	0	0	0	0	4	19,175
NY NON-MSA Group A,B,C,D	2	6,060	2	5,901	11	5,776	0	0	15	17,737
MSA 28740 (Kingston, NY)	0	0	1	1,200	1	5,269	0	0	2	6,469
MSA 27060 (Ithaca, NY)	0	0	1	7,000	1	595	2	13,324	4	20,919
MSA 21300 (Elmira, NY)	0	0	0	0	0	0	0	0	0	0
Statewide	2	26,708	0	0	0	0	2	999	4	27,707
Outside AA	2	3,720	2	2,345	0	0	0	0	4	6,065
<b>New York State Totals</b>	<b>44</b>	<b>159,578</b>	<b>35</b>	<b>117,735</b>	<b>62</b>	<b>133,803</b>	<b>53</b>	<b>754,931</b>	<b>194</b>	<b>1,166,047</b>
<b>State of Maryland</b>										
MSA 12580 (Baltimore-Towson, MD)	7	89,450	6	11,354	12	49,715	5	70,926	30	221,445
MSA 25180 (Hagerston-Martinsburg, MD-WV)	1	180	0	0	0	0	0	0	1	180
MSA 41540 (Salisbury, MD)	1	12,771	0	0	0	0	0	0	1	12,771
MD NON-MSA Group A	0	0	0	0	0	0	0	0	0	0
MD NON-MSA Groups B, C, & D	0	0	0	0	1	1,125	1	34	2	1,159
<b>State of Maryland Totals</b>	<b>9</b>	<b>102,401</b>	<b>6</b>	<b>11,354</b>	<b>13</b>	<b>50,840</b>	<b>6</b>	<b>70,960</b>	<b>34</b>	<b>235,555</b>
<b>State of Pennsylvania</b>										
MSA 49620 (York-Hanover, PA)	4	770	0	0	7	21,025	2	4,400	13	26,195
MSA 25420 (Harrisburg-Carlisle)	0	0	4	12,902	2	14,956	3	33,944	9	61,802
PA NON-MSA Group A	0	0	1	800	0	0	0	0	1	800
MSA 42540 (Scranton-Wilkes-Barre, PA)	0	0	1	9,672	0	0	2	17,477	3	27,149
MSA 11020 (Altoona, PA)	0	0	2	22,550	2	1,679	0	0	4	24,229
MSA 39740 (Reading, PA)	0	0	0	0	0	0	2	12,500	2	12,500
MSA 29540 (Lancaster, PA)	1	5,000	0	0	1	800	0	0	2	5,800
MSA 44300 (State College, PA)	0	0	2	9,615	0	0	0	0	2	9,615
MSA 48700 (Williamsport, PA)	0	0	0	0	0	0	0	0	0	0
MSA 10900 (Allentown-Bethlehem-Easton, PA)	0	0	0	0	1	3,000	3	40,599	4	43,599
MSA 30140 (Lebanon, PA)	0	0	0	0	0	0	0	0	0	0
PA NON-MSA Groups B, C, & D	0	0	0	0	0	0	0	0	0	0
Outside AA	1	3,100	0	0	3	20,828	0	0	4	23,928
<b>State of Pennsylvania Totals</b>	<b>6</b>	<b>8,870</b>	<b>10</b>	<b>55,539</b>	<b>16</b>	<b>62,288</b>	<b>12</b>	<b>108,920</b>	<b>44</b>	<b>235,617</b>
<b>State of Virginia</b>										
MSA 40060 (Richmond, VA)	0	0	0	0	0	0	3	24,750	3	24,750
Outside AA VA	0	0	0	0	1	13,400	1	17,287	2	30,687
<b>State of Virginia Totals</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>13,400</b>	<b>4</b>	<b>42,037</b>	<b>5</b>	<b>55,437</b>
<b>State of Delaware</b>										
<b>State of Delaware Totals</b>	<b>3</b>	<b>9,200</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>350</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>9,550</b>
<b>State of Florida</b>										
MD 48424 (West Palm Beach-Boca Raton-Boynton-Beach, FL)	0	0	0	0	0	0	0	0	0	0
<b>State of Florida Totals</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>State of Connecticut</b>										
MSA 14860 (Bridgeport, CT)	2	10,279	0	0	3	8,644	1	15,250	6	34,173
Outside AA Conn	1	7,720	0	0	4	20,202	0	0	5	27,922
<b>State of Connecticut Totals</b>	<b>3</b>	<b>17,999</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>28,846</b>	<b>1</b>	<b>15,250</b>	<b>11</b>	<b>62,095</b>
<b>State of Massachusetts</b>										
MD 14484 (Boston-Quincy, MA-NH)	4	36,690	0	0	4	26,040	0	0	8	62,730
Outside AA MA	1	2,702	0	0	1	1,333	0	0	2	4,035
<b>State of Massachusetts Totals</b>	<b>5</b>	<b>39,392</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>27,373</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>66,765</b>
<b>Outside Assessment Area</b>	<b>2</b>	<b>60,000</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>47,100</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>107,100</b>
<b>Total Community Development Lending</b>	<b>170</b>	<b>841,945</b>	<b>74</b>	<b>246,351</b>	<b>210</b>	<b>1,050,313</b>	<b>106</b>	<b>1,485,582</b>	<b>560</b>	<b>3,624,191</b>
Percent #S	30.4%	23.2%	13.2%	6.8%	37.5%	29.0%	18.9%	41.0%	100.0%	100.0%

CRA APPENDIX F

SUMMARY OF QUALIFIED INVESTMENTS

Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Neighborhood Stabilization		Combined Totals	
	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)
<b>Philadelphia-Camden-Wilmington, PA-DE-MD (MSA 37980)</b>												
Philadelphia-Camden-Wilmington, PA-DE-MD Totals	61	33,127	198	18,020	18	840	1	3	0	0	278	51,990
<b>New York-Long Island-Northern New Jersey (MSA 35620)</b>												
New York-Long Island-Northern New Jersey Totals	77	21,635	66	23,048	20	143	19	73	0	0	182	44,899
<b>Washington-Arlington-Alexandria DC-VA-MD-WV (MSA 47900)</b>												
Washington-Arlington-Alexandria DC-VA-MD-WV Totals	46	36,260	67	8,443	2	3	1	5	0	0	116	44,711
<b>Cumberland, MD-WV (MSA 19060)</b>												
Cumberland, MD-WV Totals	3	3,125	0	0	3	3	0	0	0	0	6	3,128
<b>New York State</b>												
MSA 15380 (Buf-Niagara Falls, NY)	22	22,484	207	4,213	0	0	20	20,983	0	0	249	47,679
MSA 40380 (Rochester, NY)	23	46,380	92	846	1	10	0	0	0	0	116	47,236
MSA 45060 (Syracuse, NY)	12	10,103	63	28,820	0	0	0	0	0	0	75	38,923
MSA 13780 (Binghamton, NY)	9	1,300	56	299	0	0	0	0	0	0	65	1,598
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	11	3,286	38	134	0	0	0	0	0	0	49	3,420
MSA 10580 (Albany-Schenectady-Troy, NY)	35	3,046	97	11,584	2	10	4	7,129	0	0	138	21,769
MSA 46540 (Utica-Rome, NY)	2	15	24	193	0	0	0	0	0	0	26	208
NY NON-MSA Group A,B,C,D	19	17,279	25	29,839	0	0	0	0	0	0	44	47,118
MSA 28740 (Kingston, NY)	2	11	19	43	0	0	0	0	0	0	21	54
MSA 27060 (Ithaca, NY)	3	17	11	19	4	17,749	1	10	0	0	19	17,795
MSA 21300 (Elmira, NY)	2	2	6	10	0	0	0	0	0	0	8	12
Statewide	3	11,341	0	0	1	393	0	0	0	0	4	11,734
Outside AA	1	1,984	2	1	0	0	0	0	0	0	3	1,985
New York State Totals	144	117,248	640	76,001	8	18,162	25	28,122	0	0	817	239,531
<b>State of Maryland</b>												
MSA 12580 (Baltimore-Towson, MD)	44	40,331	187	16,799	4	1,116	2	765	2	26,300	239	85,311
MSA 25180 (Hagerston-Martinsburg, MD-WV)	3	5	6	22	0	0	1	2	0	0	10	28
MSA 41540 (Salisbury, MD)	3	11	12	246	4	8	0	0	0	0	19	265
MD NON-MSA Group A	1	5,355	0	0	0	0	0	0	0	0	1	5,355
MD NON-MSA Groups B, C, & D	1	2,958	1	3	0	0	0	0	0	0	2	2,958
Statewide	23	3,792	0	0	2	5,426	0	0	0	0	25	9,218
State of Maryland Totals	75	52,452	206	17,070	10	6,550	3	767	2	26,300	296	103,135
<b>State of Pennsylvania</b>												
MSA 49620 (York-Hanover, PA)	16	12,053	20	805	5	85	2	51	0	0	43	12,994
MSA 25420 (Harrisburg-Carlisle)	20	4,736	82	622	10	122	6	48	0	0	118	5,528
PA NON-MSA Group A	11	5,036	70	274	3	3	0	0	0	0	84	5,313
MSA 42540 (Scranton-Wilkes-Barre, PA)	10	16,782	55	414	2	2	2	1	0	0	69	17,199
MSA 11020 (Altoona, PA)	7	281	56	243	1	15	0	0	0	0	64	539
MSA 39740 (Reading, PA)	4	14	34	165	6	8	2	2	0	0	46	189
MSA 29540 (Lancaster, PA)	19	8,869	30	203	8	53	0	0	0	0	57	9,125
MSA 44300 (State College, PA)	5	2,634	9	55	0	0	0	0	0	0	14	2,689
MSA 48700 (Williamsport, PA)	1	10	24	111	2	2	0	0	0	0	27	123
MSA 10900 (Allentown-Bethlehem-Easton, PA)	2	130	16	140	0	0	1	10	0	0	19	280
MSA 30140 (Lebanon, PA)	0	0	1	3	0	0	0	0	0	0	1	3
PA NON-MSA Groups B, C, & D	1	3	31	100	7	535	0	0	0	0	39	638
Outside AA	1	12,379	0	0	0	0	0	0	0	0	1	12,379
Statewide	3	67	1	25	0	0	1	50	0	0	5	142
State of Pennsylvania Totals	100	62,994	429	3,160	44	825	14	162	0	0	587	67,141
<b>State of Virginia</b>												
MSA 40060 (Richmond, VA)	7	3,457	0	0	0	0	0	0	0	0	7	3,457
Statewide	7	1,011	0	0	0	0	0	0	0	0	7	1,011
State of Virginia Totals	14	4,468	0	0	0	0	0	0	0	0	14	4,468
<b>State of Delaware</b>												
Non-MSA Sussex County	15	1,232	45	310	5	132	0	0	0	0	65	1,674
MSA 20100	24	2,157	69	514	1	69	0	0	0	0	94	2,740
State of Delaware Totals	39	3,389	114	824	6	201	0	0	0	0	159	4,414
<b>State of Florida</b>												
MD 48424 (West Palm Beach-Boca Raton-Boynton-Beach, FL)	3	64	3	12	1	2,000	0	0	0	0	7	2,076
State of Florida Totals	3	64	3	12	1	2,000	0	0	0	0	7	2,076
<b>State of Connecticut</b>												
MSA 14860 (Bridgeport, CT)	3	6,765	0	0	0	0	0	0	0	0	3	6,765
Outside AA Conn	3	16	0	0	0	0	0	0	0	0	3	16
State of Connecticut Totals	6	6,781	0	0	0	0	0	0	0	0	6	6,781
<b>State of Massachusetts</b>												
MD 14484 (Boston-Quincy, MA-NH)	0	0	1	2,000	0	0	0	0	0	0	1	2,000
Outside AA MA	0	0	9	20	0	0	0	0	0	0	9	20
State of Massachusetts Totals	0	0	10	2,020	0	0	0	0	0	0	10	2,020
Total Qualified Investments	568	341,543	1,733	148,598	112	28,727	63	29,132	2	26,300	2,478	574,294
Percent #/S	22.9%	59.5%	69.9%	25.9%	4.5%	5.0%	2.5%	5.1%	0.1%	4.6%	100.0%	100.0%

APPENDIX G

AGGREGATE LOAN DISTRIBUTION TABLES 2013

2013 Aggregate Comparison Loan Distribution Table  
Assessment Area/Group: MSA 37980

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)
	<b>Home Purchase</b>									
Low	26	4.3%	2.5%	5.7%	3.2%	19	3.1%	1.4%	8.8%	4.1%
Moderate	131	21.7%	14.1%	14.7%	9.7%	62	10.3%	6.7%	19.8%	13.7%
Middle	226	37.4%	34.0%	33.1%	28.4%	55	9.1%	8.7%	20.9%	19.2%
Upper	221	36.6%	49.4%	46.5%	58.7%	115	19.0%	28.1%	38.3%	52.1%
Unknown	0	0.0%	0.0%	0.1%	0.0%	353	58.4%	55.1%	12.2%	10.9%
<b>Total</b>	<b>604</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>604</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	29	3.5%	1.4%	3.8%	9.7%	30	3.6%	1.9%	6.5%	2.5%
Moderate	157	18.9%	12.1%	11.8%	15.9%	81	9.7%	5.7%	14.3%	7.1%
Middle	318	38.2%	36.4%	32.6%	24.1%	79	9.5%	7.6%	20.0%	12.3%
Upper	328	39.4%	50.0%	51.8%	50.3%	169	20.3%	30.6%	45.0%	41.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	473	56.9%	54.2%	14.2%	36.6%
<b>Total</b>	<b>832</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>832</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	7	7.4%	2.1%	8.8%	4.0%	22	23.2%	3.2%	12.9%	4.2%
Moderate	19	20.0%	24.6%	15.3%	8.0%	25	26.3%	6.5%	18.8%	10.5%
Middle	41	43.2%	21.7%	33.0%	26.3%	21	22.1%	4.5%	22.2%	18.0%
Upper	28	29.5%	51.5%	42.9%	61.7%	20	21.1%	46.4%	41.9%	58.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	7.4%	39.5%	4.1%	8.7%
<b>Total</b>	<b>95</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>95</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	16.9%	11.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	10	37.0%	52.6%	22.8%	21.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	15	55.6%	30.4%	31.0%	30.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	7.4%	16.9%	29.3%	36.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	27	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	62	4.0%	0.8%	4.7%	7.7%	71	4.6%	0.7%	7.6%	2.9%
Moderate	317	20.3%	35.8%	13.0%	14.2%	168	10.8%	2.6%	16.4%	8.8%
Middle	600	38.5%	32.5%	32.8%	25.8%	155	9.9%	3.4%	20.3%	13.9%
Upper	579	37.2%	30.9%	49.4%	52.3%	304	19.5%	12.7%	42.3%	42.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	860	55.2%	80.6%	13.3%	31.7%
<b>Total</b>	<b>1,558</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,558</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>					<b>By Revenue</b>				
	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)
Low	13	2.4%	1.7%	5.1%	5.4%	13	2.4%	1.7%	5.1%	5.4%
Moderate	96	17.9%	15.0%	11.3%	11.2%	96	17.9%	15.0%	11.3%	11.2%
Middle	194	36.3%	38.4%	29.6%	30.7%	194	36.3%	38.4%	29.6%	30.7%
Upper	230	43.0%	44.8%	51.5%	50.7%	230	43.0%	44.8%	51.5%	50.7%
Unknown	2	0.4%	0.1%	0.6%	1.2%	2	0.4%	0.1%	0.6%	1.2%
Tract Unknown	0	0.0%	0.0%	1.8%	0.8%	0	0.0%	0.0%	1.8%	0.8%
<b>Total</b>	<b>535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>By Loan Size</b>					<b>By Loan Size</b>				
\$1 Million or Less	236	44.1%	30.6%	47.7%	33.2%	236	44.1%	30.6%	47.7%	33.2%
\$100,000 or less	238	44.5%	9.0%	91.8%	32.9%	238	44.5%	9.0%	91.8%	32.9%
\$100,001-\$250,000	115	21.5%	15.2%	3.8%	14.7%	115	21.5%	15.2%	3.8%	14.7%
\$250,001-\$1 Million	182	34.0%	75.8%	4.5%	52.4%	182	34.0%	75.8%	4.5%	52.4%
<b>Total</b>	<b>535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 35620

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	84	6.7%	2.7%	2.5%	2.3%	46	3.7%	0.6%	2.0%	0.7%
Moderate	328	26.1%	9.3%	13.0%	10.4%	209	16.7%	3.2%	11.3%	5.6%
Middle	471	37.5%	23.2%	35.8%	28.8%	182	14.5%	4.7%	20.7%	13.4%
Upper	372	29.6%	64.8%	48.6%	58.3%	226	18.0%	12.2%	57.0%	69.0%
Unknown	0	0.0%	0.0%	0.1%	0.2%	592	47.2%	79.2%	9.0%	11.2%
<b>Total</b>	<b>1,255</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,255</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	19	2.6%	3.2%	1.5%	1.9%	8	1.1%	0.4%	3.5%	1.5%
Moderate	92	12.8%	10.8%	9.6%	10.7%	36	5.0%	2.1%	8.9%	4.0%
Middle	282	39.1%	35.2%	33.4%	30.4%	62	8.6%	4.4%	17.3%	9.5%
Upper	327	45.4%	50.5%	55.4%	56.8%	203	28.2%	37.5%	59.6%	56.7%
Unknown	1	0.1%	0.2%	0.1%	0.1%	412	57.1%	55.5%	10.8%	28.2%
<b>Total</b>	<b>721</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>721</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	4	6.3%	1.4%	1.8%	1.5%	5	7.8%	0.1%	4.6%	1.5%
Moderate	11	17.2%	58.6%	11.3%	10.0%	7	10.9%	0.2%	12.7%	5.7%
Middle	20	31.3%	2.5%	40.7%	30.1%	11	17.2%	0.8%	22.4%	12.8%
Upper	28	43.8%	37.5%	46.2%	58.3%	14	21.9%	1.6%	55.1%	65.9%
Unknown	1	1.6%	0.0%	0.1%	0.0%	27	42.2%	97.3%	5.3%	14.2%
<b>Total</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	10	14.9%	3.9%	11.9%	10.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	10	14.9%	30.5%	30.5%	26.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	16	23.9%	20.9%	25.2%	23.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	31	46.3%	44.8%	32.1%	39.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.2%	0.3%	67	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>67</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>67</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	117	5.6%	3.0%	2.1%	3.1%	59	2.8%	0.4%	2.8%	1.0%
Moderate	441	20.9%	17.3%	11.6%	12.3%	252	12.0%	2.1%	10.0%	4.2%
Middle	789	37.4%	23.7%	34.6%	29.0%	255	12.1%	3.3%	18.7%	10.1%
Upper	758	36.0%	55.9%	51.6%	55.4%	443	21.0%	13.1%	57.2%	55.4%
Unknown	2	0.1%	0.0%	0.1%	0.2%	1,098	52.1%	81.1%	11.4%	29.3%
<b>Total</b>	<b>2,107</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,107</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank		Aggregate		Bank		Aggregate		
		%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	19	3.2%	2.5%	2.5%	2.5%	5.5%	4.7%			
Moderate	52	8.7%	9.7%	14.3%	14.3%					
Middle	183	30.8%	39.0%	30.7%	31.7%					
Upper	335	56.3%	48.1%	46.3%	45.3%					
Unknown	6	1.0%	0.7%	2.0%	3.1%					
Tract Unknown	0	0.0%	0.0%	1.2%	0.9%					
<b>Total</b>	<b>595</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	243	40.8%	29.1%	43.6%	30.9%					
	<b>By Loan Size</b>									
\$100,000 or less	239	40.2%	7.7%	94.9%	38.6%					
\$100,001-\$250,000	130	21.8%	14.7%	2.3%	12.0%					
\$250,001-\$1 Million	226	38.0%	77.6%	2.8%	49.4%					
<b>Total</b>	<b>595</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 47900

Income Categories	HMDA										
	By Tract Income					By Borrower Income					
	Bank		Aggregate			Bank		Aggregate			
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
<b>Home Purchase</b>											
Low	38	5.4%	4.7%	3.8%	2.8%	39	5.5%	3.0%	9.3%	4.4%	
Moderate	207	29.4%	26.9%	17.9%	13.2%	78	11.1%	9.2%	19.1%	13.7%	
Middle	299	42.5%	38.1%	37.9%	32.6%	89	12.7%	13.8%	23.4%	22.3%	
Upper	159	22.6%	30.3%	40.4%	51.3%	123	17.5%	28.4%	33.9%	46.0%	
Unknown	0	0.0%	0.0%	0.1%	0.1%	374	53.2%	45.6%	14.3%	13.6%	
<b>Total</b>	<b>703</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>703</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>Refinance</b>											
Low	40	3.8%	3.0%	3.2%	3.0%	50	4.7%	2.5%	7.6%	3.7%	
Moderate	253	23.7%	19.1%	16.1%	13.5%	104	9.8%	7.5%	14.9%	9.6%	
Middle	507	47.6%	43.5%	36.9%	31.1%	123	11.5%	10.7%	21.9%	17.9%	
Upper	266	25.0%	34.4%	43.8%	52.4%	138	12.9%	21.7%	36.9%	43.4%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	651	61.1%	57.6%	18.8%	25.5%	
<b>Total</b>	<b>1,066</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,066</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>Home Improvement</b>											
Low	2	2.2%	0.8%	4.4%	2.6%	24	26.7%	10.9%	13.5%	5.0%	
Moderate	25	27.8%	26.1%	20.1%	12.7%	24	26.7%	17.3%	20.7%	11.7%	
Middle	43	47.8%	18.6%	39.3%	30.2%	20	22.2%	18.0%	24.3%	19.5%	
Upper	20	22.2%	54.5%	36.2%	54.4%	16	17.8%	7.7%	35.1%	50.0%	
Unknown	0	0.0%	0.0%	0.0%	0.1%	6	6.7%	46.1%	6.4%	13.9%	
<b>Total</b>	<b>90</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>90</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>Multi-Family</b>											
Low	5	31.3%	4.3%	32.4%	19.8%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	4	25.0%	34.5%	36.9%	43.4%	0	0.0%	0.0%	0.0%	0.0%	
Middle	6	37.5%	51.4%	15.1%	21.7%	0	0.0%	0.0%	0.0%	0.0%	
Upper	1	6.3%	9.9%	15.6%	15.1%	0	0.0%	0.0%	0.0%	0.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	100.0%	100.0%	100.0%	100.0%	
<b>Total</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>HMDA Totals</b>											
Low	85	4.5%	4.0%	3.5%	3.5%	113	6.0%	1.4%	8.3%	3.9%	
Moderate	489	26.1%	28.2%	16.9%	14.5%	206	11.0%	4.3%	16.6%	10.8%	
Middle	855	45.6%	46.0%	37.3%	31.3%	232	12.4%	6.3%	22.5%	18.9%	
Upper	446	23.8%	21.9%	42.3%	50.7%	277	14.8%	12.7%	35.7%	42.9%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	1,047	55.8%	75.2%	16.9%	23.5%	
<b>Total</b>	<b>1,875</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,875</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>SMALL BUSINESS</b>											
<b>By Tract Income</b>											
		Bank			Aggregate						
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
Low	24	3.7%		2.2%			3.7%		3.5%		
Moderate	159	24.3%		27.3%			18.3%		18.3%		
Middle	279	42.6%		41.1%			34.5%		36.4%		
Upper	193	29.5%		29.4%			42.3%		41.2%		
Unknown	0	0.0%		0.0%			0.1%		0.2%		
Tract Unknown	0	0.0%		0.0%			1.0%		0.5%		
<b>Total</b>	<b>655</b>	<b>100.0%</b>		<b>100.0%</b>			<b>100.0%</b>		<b>100.0%</b>		
<b>By Revenue</b>											
\$1 Million or Less	350		53.4%		39.7%		51.6%		33.3%		
<b>By Loan Size</b>											
\$100,000 or less	340		51.9%		13.7%		92.6%		31.0%		
\$100,001-\$250,000	167		25.5%		24.7%		3.3%		14.2%		
\$250,001-\$1 Million	148		22.6%		61.6%		4.2%		54.8%		
<b>Total</b>	<b>655</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 19060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	3	37.5%	24.0%	7.6%	4.1%
Moderate	1	12.5%	7.8%	16.4%	15.9%	1	12.5%	14.2%	23.7%	18.5%
Middle	7	87.5%	92.2%	64.1%	61.0%	1	12.5%	11.5%	25.2%	24.6%
Upper	0	0.0%	0.0%	19.5%	23.2%	2	25.0%	35.9%	31.2%	40.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	14.5%	12.4%	11.9%
<i>Total</i>	8	100.0%	100.0%	100.0%	100.0%	8	100.0%	100.0%	100.0%	100.0%
	<b>Refinance</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	5	12.5%	6.7%	7.3%	3.0%
Moderate	5	12.5%	8.1%	13.4%	15.5%	5	12.5%	11.6%	14.1%	7.4%
Middle	29	72.5%	71.2%	64.8%	65.7%	9	22.5%	17.1%	21.6%	13.0%
Upper	6	15.0%	20.7%	21.7%	18.8%	15	37.5%	51.7%	46.2%	39.7%
Unknown	0	0.0%	0.0%	0.1%	0.1%	6	15.0%	12.8%	10.9%	36.8%
<i>Total</i>	40	100.0%	100.0%	100.0%	100.0%	40	100.0%	100.0%	100.0%	100.0%
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	9	34.6%	10.2%	13.0%	3.5%
Moderate	12	46.2%	12.5%	21.5%	15.7%	7	26.9%	7.4%	14.4%	7.3%
Middle	8	30.8%	77.4%	63.3%	69.6%	1	3.8%	0.9%	19.3%	12.0%
Upper	6	23.1%	10.2%	15.2%	14.7%	7	26.9%	12.2%	50.4%	72.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	7.7%	69.3%	3.0%	4.9%
<i>Total</i>	26	100.0%	100.0%	100.0%	100.0%	26	100.0%	100.0%	100.0%	100.0%
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	57.1%	66.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	42.9%	33.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
	<b>HMDA Totals</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	17	23.0%	9.5%	8.0%	3.3%
Moderate	18	24.3%	8.3%	15.4%	16.6%	13	17.6%	11.7%	17.3%	10.6%
Middle	44	59.5%	74.8%	64.3%	63.8%	11	14.9%	15.1%	22.5%	16.2%
Upper	12	16.2%	16.9%	20.2%	19.6%	24	32.4%	46.5%	41.4%	40.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	12.2%	17.0%	10.8%	29.4%
<i>Total</i>	74	100.0%	100.0%	100.0%	100.0%	74	100.0%	100.0%	100.0%	100.0%
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	10	18.2%	13.7%	13.7%	13.7%	10	21.2%	16.4%	16.4%	16.4%
Middle	31	56.4%	61.6%	61.6%	61.6%	31	56.1%	69.0%	69.0%	69.0%
Upper	14	25.5%	24.7%	24.7%	24.7%	14	18.2%	13.4%	13.4%	13.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	4.5%	1.1%	1.1%
<i>Total</i>	55	100.0%	100.0%	100.0%	100.0%	55	100.0%	100.0%	100.0%	100.0%
	<b>By Revenue</b>									
\$1 Million or Less	24	43.6%	22.3%	22.3%	22.3%	24	32.1%	23.2%	23.2%	23.2%
	<b>By Loan Size</b>									
\$100,000 or less	32	58.2%	16.7%	16.7%	16.7%	32	87.7%	27.7%	27.7%	27.7%
\$100,001-\$250,000	14	25.5%	28.1%	28.1%	28.1%	14	7.4%	26.0%	26.0%	26.0%
\$250,001-\$1 Million	9	16.4%	55.2%	55.2%	55.2%	9	4.9%	46.3%	46.3%	46.3%
<i>Total</i>	55	100.0%	100.0%	100.0%	100.0%	55	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 15380

Income Categories	HMDA										
	By Tract Income					By Borrower Income					
	Bank		Aggregate			Bank		Aggregate			
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
<b>Home Purchase</b>											
Low	81	3.9%	1.8%	2.5%	1.2%	207	10.0%	4.4%	7.6%	3.8%	
Moderate	274	13.3%	8.3%	11.8%	7.3%	557	27.0%	17.0%	22.9%	16.0%	
Middle	870	42.1%	34.5%	43.6%	36.0%	426	20.6%	20.0%	24.6%	23.2%	
Upper	840	40.7%	55.4%	42.1%	55.6%	530	25.7%	40.0%	29.6%	42.9%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	345	16.7%	18.7%	15.3%	14.0%	
<b>Total</b>	<b>2,065</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,065</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>Refinance</b>											
Low	20	2.2%	1.6%	1.6%	5.5%	34	3.8%	1.9%	4.9%	2.0%	
Moderate	74	8.3%	5.4%	7.5%	3.7%	136	15.2%	10.0%	15.7%	8.8%	
Middle	342	38.2%	29.1%	40.6%	32.4%	221	24.7%	19.2%	24.6%	16.8%	
Upper	459	51.3%	63.8%	50.3%	58.4%	385	43.0%	56.9%	40.2%	40.7%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	119	13.3%	12.0%	14.5%	31.8%	
<b>Total</b>	<b>895</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>895</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>Home Improvement</b>											
Low	30	10.8%	4.1%	5.4%	1.9%	56	20.1%	6.6%	11.6%	4.0%	
Moderate	37	13.3%	12.2%	14.6%	6.8%	61	21.9%	8.3%	24.6%	12.4%	
Middle	126	45.2%	34.2%	44.2%	38.4%	81	29.0%	18.2%	27.2%	26.2%	
Upper	86	30.8%	49.4%	35.8%	53.0%	64	22.9%	46.0%	32.7%	50.2%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	6.1%	20.9%	3.9%	7.3%	
<b>Total</b>	<b>279</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>279</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>Multi-Family</b>											
Low	4	17.4%	3.0%	10.4%	8.1%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	2	8.7%	8.1%	20.0%	7.6%	0	0.0%	0.0%	0.0%	0.0%	
Middle	9	39.1%	32.0%	42.4%	37.6%	0	0.0%	0.0%	0.0%	0.0%	
Upper	8	34.8%	56.8%	27.2%	46.7%	0	0.0%	0.0%	0.0%	0.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	100.0%	100.0%	100.0%	100.0%	
<b>Total</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>HMDA Totals</b>											
Low	135	4.1%	1.9%	2.4%	3.4%	297	9.1%	3.3%	6.9%	2.9%	
Moderate	387	11.9%	7.6%	10.4%	5.7%	754	23.1%	13.5%	20.1%	12.1%	
Middle	1,347	41.3%	32.8%	42.5%	34.6%	728	22.3%	18.1%	24.7%	19.4%	
Upper	1,393	42.7%	57.8%	44.7%	56.3%	979	30.0%	41.6%	33.8%	40.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	504	15.5%	23.4%	14.5%	25.6%	
<b>Total</b>	<b>3,262</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,262</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>SMALL BUSINESS</b>											
<b>By Tract Income</b>											
		Bank		Aggregate							
		#	%	% \$(000s)	%	% \$(000s)		%	% \$(000s)		
Low		61	7.1%	6.7%				6.4%	6.0%		
Moderate		128	14.9%	15.0%				13.2%	16.5%		
Middle		323	37.5%	36.0%				39.4%	38.7%		
Upper		349	40.5%	42.3%				39.5%	38.1%		
Unknown		0	0.0%	0.0%				0.1%	0.1%		
Tract Unknown		0	0.0%	0.0%				1.4%	0.5%		
<b>Total</b>		<b>861</b>	<b>100.0%</b>	<b>100.0%</b>				<b>100.0%</b>	<b>100.0%</b>		
<b>By Revenue</b>											
\$1 Million or Less		443	51.5%	31.0%				40.6%	32.4%		
<b>By Loan Size</b>											
\$100,000 or less		481	55.9%	14.9%				91.9%	30.0%		
\$100,001-\$250,000		213	24.7%	25.4%				4.2%	17.6%		
\$250,001-\$1 Million		167	19.4%	59.7%				3.9%	52.4%		
<b>Total</b>		<b>861</b>	<b>100.0%</b>	<b>100.0%</b>				<b>100.0%</b>	<b>100.0%</b>		

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 40380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	28	2.8%	1.3%	2.2%	1.3%	154	15.3%	6.0%	9.5%	5.1%
Moderate	150	14.9%	7.6%	11.5%	7.1%	313	31.1%	17.5%	23.1%	16.9%
Middle	581	57.6%	60.1%	56.0%	51.3%	160	15.9%	14.3%	21.4%	20.2%
Upper	249	24.7%	31.0%	30.3%	40.4%	217	21.5%	30.9%	30.9%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	164	16.3%	31.3%	15.2%	14.4%
<b>Total</b>	<b>1,008</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,008</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	6	1.7%	1.1%	1.4%	0.8%	21	6.0%	3.2%	7.0%	3.1%
Moderate	31	8.9%	6.3%	8.9%	8.5%	62	17.8%	13.0%	17.4%	10.0%
Middle	216	61.9%	55.4%	54.4%	52.8%	87	24.9%	21.9%	23.7%	16.7%
Upper	96	27.5%	37.1%	35.4%	37.9%	107	30.7%	41.0%	41.7%	43.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	72	20.6%	20.9%	10.3%	26.7%
<b>Total</b>	<b>349</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>349</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	5	3.7%	1.9%	2.8%	1.2%	21	15.4%	11.4%	12.1%	5.1%
Moderate	23	16.9%	10.5%	14.8%	8.1%	37	27.2%	12.8%	25.5%	17.3%
Middle	84	61.8%	65.5%	61.6%	59.4%	45	33.1%	23.5%	28.2%	25.0%
Upper	24	17.6%	22.1%	20.8%	31.3%	31	22.8%	35.1%	32.3%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.5%	17.2%	1.8%	4.5%
<b>Total</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	11	33.3%	14.4%	23.7%	7.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	6.1%	3.2%	21.4%	12.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	12	36.4%	32.2%	37.4%	42.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	8	24.2%	50.2%	17.6%	37.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	33	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	50	3.3%	6.9%	2.1%	1.7%	196	12.8%	3.1%	8.8%	3.8%
Moderate	206	13.5%	5.6%	10.9%	8.2%	412	27.0%	9.4%	21.1%	12.6%
Middle	893	58.5%	47.5%	55.9%	51.3%	292	19.1%	9.2%	22.9%	17.0%
Upper	377	24.7%	40.0%	31.1%	38.8%	355	23.3%	19.0%	35.0%	39.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	271	17.8%	59.3%	12.2%	27.1%
<b>Total</b>	<b>1,526</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,526</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)					
Low	111	15.2%	14.9%	8.0%	10.8%					
Moderate	72	9.8%	8.7%	10.7%	11.2%					
Middle	311	42.5%	43.0%	50.6%	47.1%					
Upper	238	32.5%	33.3%	29.0%	30.2%					
Unknown	0	0.0%	0.0%	0.1%	0.1%					
Tract Unknown	0	0.0%	0.0%	1.6%	0.7%					
<b>Total</b>	<b>732</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	395	54.0%	32.1%	40.0%	34.8%					
<b>By Loan Size</b>										
\$100,000 or less	411	56.1%	14.1%	91.3%	29.8%					
\$100,001-\$250,000	153	20.9%	21.7%	4.3%	17.2%					
\$250,001-\$1 Million	168	23.0%	64.3%	4.4%	53.0%					
<b>Total</b>	<b>732</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases



**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 45060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	7	1.9%	0.8%	2.1%	1.2%	17	4.6%	2.4%	8.1%	4.4%
Moderate	47	12.7%	8.3%	13.0%	8.3%	50	13.5%	9.7%	22.6%	16.7%
Middle	155	41.9%	39.7%	41.0%	37.1%	59	15.9%	13.9%	22.3%	20.5%
Upper	161	43.5%	51.2%	44.0%	53.5%	65	17.6%	28.3%	31.9%	45.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	179	48.4%	45.6%	15.1%	12.9%
<i>Total</i>	<i>370</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>370</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	1	0.4%	0.2%	1.2%	0.5%	9	3.5%	2.2%	6.2%	2.6%
Moderate	23	8.8%	5.2%	8.3%	4.3%	34	13.1%	8.2%	14.9%	7.9%
Middle	97	37.3%	34.7%	40.2%	47.5%	56	21.5%	19.2%	23.6%	15.7%
Upper	139	53.5%	59.9%	50.2%	47.8%	91	35.0%	43.1%	43.8%	44.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	70	26.9%	27.2%	11.5%	29.2%
<i>Total</i>	<i>260</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>260</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	7	5.7%	8.1%	4.2%	2.3%	16	13.1%	4.9%	9.5%	3.6%
Moderate	10	8.2%	14.4%	12.7%	7.5%	26	21.3%	6.0%	21.8%	14.6%
Middle	46	37.7%	30.5%	42.7%	35.2%	32	26.2%	22.8%	25.6%	22.3%
Upper	59	48.4%	47.1%	40.3%	55.0%	39	32.0%	31.4%	40.8%	54.6%
Unknown	0	0.0%	0.0%	0.1%	0.0%	9	7.4%	35.0%	2.2%	4.8%
<i>Total</i>	<i>122</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>122</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	6	40.0%	10.1%	36.8%	9.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.0%	5.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	7	46.7%	78.7%	26.3%	26.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	13.3%	11.1%	22.8%	59.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	21	2.7%	4.6%	2.1%	1.7%	42	5.5%	1.4%	7.5%	3.2%
Moderate	80	10.4%	4.3%	11.1%	6.3%	110	14.3%	5.3%	19.4%	11.4%
Middle	305	39.8%	54.4%	40.8%	40.3%	147	19.2%	9.6%	23.1%	16.6%
Upper	361	47.1%	36.6%	46.0%	51.7%	195	25.4%	20.1%	37.5%	41.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	273	35.6%	63.7%	12.6%	27.7%
<i>Total</i>	<i>767</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>767</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)			
Low	62	14.2%	21.1%	13.5%	18.9%					
Moderate	48	11.0%	6.9%	10.6%	10.3%					
Middle	182	41.6%	37.8%	40.7%	42.9%					
Upper	145	33.2%	34.1%	33.0%	27.4%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.2%	0.5%					
<i>Total</i>	<i>437</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
<b>By Revenue</b>										
\$1 Million or Less	236	54.0%	35.2%	39.1%	29.3%					
<b>By Loan Size</b>										
\$100,000 or less	245	56.1%	14.4%	91.0%	26.4%					
\$100,001-\$250,000	82	18.8%	19.2%	4.0%	15.4%					
\$250,001-\$1 Million	110	25.2%	66.3%	5.0%	58.2%					
<i>Total</i>	<i>437</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 13780

Income Categories	HMDA										
	By Tract Income					By Borrower Income					
	Bank		Aggregate			Bank		Aggregate			
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
	<b>Home Purchase</b>										
Low	5	2.5%	1.8%	2.2%	1.5%	12	5.9%	2.7%	7.6%	4.5%	
Moderate	24	11.8%	8.1%	9.4%	6.5%	69	34.0%	26.5%	23.3%	18.4%	
Middle	113	55.7%	50.9%	56.2%	52.2%	42	20.7%	17.5%	24.3%	23.2%	
Upper	61	30.0%	39.2%	32.2%	39.8%	63	31.0%	45.9%	32.5%	43.9%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	8.4%	7.4%	12.3%	9.9%	
<i>Total</i>	<i>203</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>203</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>Refinance</b>										
Low	6	3.8%	3.1%	1.9%	1.0%	14	8.9%	4.9%	5.2%	2.3%	
Moderate	16	10.2%	5.3%	8.0%	4.1%	23	14.6%	9.5%	14.4%	7.6%	
Middle	69	43.9%	41.5%	51.9%	38.0%	37	23.6%	19.2%	22.9%	14.4%	
Upper	66	42.0%	50.1%	38.2%	56.9%	68	43.3%	57.7%	46.7%	44.2%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	9.6%	8.8%	10.8%	31.5%	
<i>Total</i>	<i>157</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>157</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>Home Improvement</b>										
Low	2	3.6%	2.2%	1.5%	1.5%	11	19.6%	12.1%	10.8%	3.8%	
Moderate	10	17.9%	10.8%	8.2%	5.6%	11	19.6%	10.6%	19.9%	10.0%	
Middle	32	57.1%	71.5%	66.3%	63.9%	17	30.4%	16.4%	24.9%	22.1%	
Upper	12	21.4%	15.5%	24.0%	29.0%	17	30.4%	60.8%	41.7%	56.1%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.7%	8.0%	
<i>Total</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>Multi-Family</b>										
Low	2	50.0%	74.3%	25.8%	9.5%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	0	0.0%	0.0%	19.4%	3.4%	0	0.0%	0.0%	0.0%	0.0%	
Middle	0	0.0%	0.0%	41.9%	76.8%	0	0.0%	0.0%	0.0%	0.0%	
Upper	2	50.0%	25.7%	12.9%	10.3%	0	0.0%	0.0%	0.0%	0.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%	
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>HMDA Totals</b>										
Low	15	3.6%	5.2%	2.1%	1.6%	37	8.8%	3.6%	6.9%	3.2%	
Moderate	50	11.9%	6.6%	8.7%	5.1%	103	24.5%	18.1%	18.9%	11.8%	
Middle	214	51.0%	45.2%	55.6%	46.5%	96	22.9%	17.5%	23.6%	17.8%	
Upper	141	33.6%	43.0%	33.6%	46.8%	148	35.2%	49.2%	39.6%	42.9%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	36	8.6%	11.6%	10.9%	24.4%	
<i>Total</i>	<i>420</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>420</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>SMALL BUSINESS</b>										
	<b>By Tract Income</b>										
		Bank		Aggregate				Bank		Aggregate	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
Low	25	11.2%	10.4%	9.6%	10.0%						
Moderate	25	11.2%	10.6%	14.7%	12.2%						
Middle	94	42.0%	41.1%	46.2%	45.4%						
Upper	80	35.7%	38.0%	27.8%	31.9%						
Unknown	0	0.0%	0.0%	0.0%	0.0%						
Tract Unknown	0	0.0%	0.0%	1.6%	0.5%						
<i>Total</i>	<i>224</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>						
	<b>By Revenue</b>										
\$1 Million or Less	114	50.9%	39.8%	42.6%	38.6%						
	<b>By Loan Size</b>										
\$100,000 or less	139	62.1%	21.2%	92.5%	33.5%						
\$100,001-\$250,000	57	25.4%	34.5%	4.2%	20.5%						
\$250,001-\$1 Million	28	12.5%	44.3%	3.3%	45.9%						
<i>Total</i>	<i>224</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>						

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
**Assessment Area/Group: MSA 10580**

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
	<b>Home Purchase</b>									
Low	21	4.6%	2.6%	3.3%	1.8%	44	9.5%	4.7%	7.1%	3.7%
Moderate	62	13.4%	9.7%	9.3%	6.4%	132	28.6%	22.3%	24.8%	19.1%
Middle	259	56.2%	54.9%	55.4%	53.4%	92	20.0%	21.1%	24.0%	23.6%
Upper	119	25.8%	32.8%	32.0%	38.4%	107	23.2%	35.5%	31.9%	42.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	86	18.7%	16.4%	12.2%	10.8%
<i>Total</i>	461	100.0%	100.0%	100.0%	100.0%	461	100.0%	100.0%	100.0%	100.0%
	<b>Refinance</b>									
Low	9	4.5%	4.1%	2.3%	5.0%	8	4.0%	2.5%	4.9%	2.3%
Moderate	19	9.6%	7.7%	8.0%	7.6%	36	18.2%	14.7%	17.8%	11.5%
Middle	120	60.6%	55.4%	55.7%	52.6%	44	22.2%	19.7%	25.0%	19.4%
Upper	50	25.3%	32.8%	34.1%	34.8%	56	28.3%	36.7%	37.0%	37.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	54	27.3%	26.4%	15.3%	29.2%
<i>Total</i>	198	100.0%	100.0%	100.0%	100.0%	198	100.0%	100.0%	100.0%	100.0%
	<b>Home Improvement</b>									
Low	1	3.7%	0.3%	2.1%	1.3%	6	22.2%	4.6%	9.0%	4.3%
Moderate	4	14.8%	1.4%	8.6%	7.0%	2	7.4%	0.6%	19.6%	13.8%
Middle	17	63.0%	50.7%	58.6%	56.4%	10	37.0%	28.4%	26.8%	24.4%
Upper	5	18.5%	47.7%	30.7%	35.2%	8	29.6%	54.2%	41.8%	53.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.7%	12.2%	2.8%	3.8%
<i>Total</i>	27	100.0%	100.0%	100.0%	100.0%	27	100.0%	100.0%	100.0%	100.0%
	<b>Multi-Family</b>									
Low	2	10.5%	0.5%	19.5%	4.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	15.8%	3.5%	24.6%	4.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	10	52.6%	52.3%	42.4%	54.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	21.1%	43.7%	13.6%	36.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	19	100.0%	100.0%	100.0%	100.0%	19	100.0%	100.0%	100.0%	100.0%
	<b>HMDA Totals</b>									
Low	33	4.7%	1.9%	2.8%	3.5%	58	8.2%	2.3%	6.1%	2.9%
Moderate	88	12.5%	6.6%	8.7%	7.0%	170	24.1%	11.2%	20.9%	14.4%
Middle	406	57.6%	53.8%	55.7%	53.1%	146	20.7%	11.7%	24.5%	20.5%
Upper	178	25.2%	37.8%	32.9%	36.4%	171	24.3%	20.3%	34.9%	38.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	160	22.7%	54.4%	13.6%	23.6%
<i>Total</i>	705	100.0%	100.0%	100.0%	100.0%	705	100.0%	100.0%	100.0%	100.0%
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>					<b>By Revenue</b>				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Low	9	4.1%	4.4%	6.9%	10.1%					
Moderate	30	13.7%	12.1%	11.7%	13.3%					
Middle	132	60.3%	57.8%	50.7%	51.1%					
Upper	48	21.9%	25.7%	28.7%	24.9%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.0%	0.6%					
<i>Total</i>	219	100.0%	100.0%	100.0%	100.0%					
	<b>By Loan Size</b>					<b>By Revenue</b>				
\$1 Million or Less	82	37.4%	25.3%	42.7%	29.1%					
\$100,000 or less	85	38.8%	7.5%	90.4%	23.7%					
\$100,001-\$250,000	54	24.7%	17.1%	4.2%	15.2%					
\$250,001-\$1 Million	80	36.5%	75.4%	5.4%	61.1%					
<i>Total</i>	219	100.0%	100.0%	100.0%	100.0%					

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 39100

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	34	13.8%	11.6%	4.8%	4.4%	34	13.8%	10.1%	5.7%	3.0%
Moderate	29	11.7%	8.6%	9.2%	6.4%	61	24.7%	18.6%	21.4%	15.9%
Middle	123	49.8%	46.9%	55.0%	54.0%	46	18.6%	18.1%	28.9%	27.8%
Upper	61	24.7%	33.0%	31.0%	35.2%	62	25.1%	34.6%	34.0%	42.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	44	17.8%	18.6%	10.0%	10.4%
<i>Total</i>	<i>247</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>247</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	3	3.8%	3.4%	3.0%	2.5%	3	3.8%	2.0%	6.0%	3.0%
Moderate	11	14.1%	12.1%	9.7%	12.4%	11	14.1%	9.8%	15.7%	9.4%
Middle	42	53.8%	56.2%	56.8%	57.9%	10	12.8%	10.2%	26.1%	19.2%
Upper	22	28.2%	28.3%	30.4%	27.3%	26	33.3%	38.9%	39.9%	38.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	28	35.9%	39.1%	12.2%	30.1%
<i>Total</i>	<i>78</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>78</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	2	7.4%	39.3%	3.9%	7.5%	4	14.8%	1.0%	10.8%	6.0%
Moderate	6	22.2%	20.5%	9.0%	5.1%	8	29.6%	2.0%	20.9%	15.0%
Middle	10	37.0%	14.2%	60.2%	59.9%	3	11.1%	27.7%	29.7%	27.0%
Upper	9	33.3%	26.0%	27.0%	27.6%	7	25.9%	13.6%	33.9%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	18.5%	55.7%	4.6%	9.5%
<i>Total</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	11.5%	3.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	44.4%	42.1%	28.8%	21.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	5	55.6%	57.9%	51.9%	69.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	7.7%	5.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	39	10.8%	7.6%	3.9%	3.4%	41	11.4%	5.5%	6.0%	2.9%
Moderate	50	13.9%	19.5%	9.5%	10.2%	80	22.2%	11.1%	18.4%	11.8%
Middle	180	49.9%	50.8%	56.1%	56.8%	59	16.3%	11.7%	27.4%	22.1%
Upper	92	25.5%	22.1%	30.5%	29.6%	95	26.3%	24.4%	36.9%	38.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	86	23.8%	47.4%	11.3%	24.7%
<i>Total</i>	<i>361</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>361</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)					
Low	11	5.1%	2.5%	12.5%	8.4%					
Moderate	27	12.6%	8.1%	11.1%	11.4%					
Middle	139	64.7%	78.3%	49.5%	54.8%					
Upper	38	17.7%	11.2%	23.9%	23.7%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.0%	1.8%					
<i>Total</i>	<i>215</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
<b>By Revenue</b>										
\$1 Million or Less	132	61.4%	38.5%	45.3%	36.3%					
<b>By Loan Size</b>										
\$100,000 or less	129	60.0%	16.9%	94.6%	38.6%					
\$100,001-\$250,000	42	19.5%	20.9%	2.7%	15.2%					
\$250,001-\$1 Million	44	20.5%	62.2%	2.7%	46.2%					
<i>Total</i>	<i>215</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 46540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	1	0.5%	0.2%	2.3%	1.2%	19	10.3%	6.8%	11.2%	6.8%
Moderate	16	8.6%	5.7%	9.5%	6.1%	60	32.4%	26.3%	28.3%	23.2%
Middle	110	59.5%	57.3%	58.0%	55.5%	25	13.5%	13.7%	22.3%	22.8%
Upper	58	31.4%	36.8%	30.1%	37.1%	41	22.2%	29.1%	23.9%	35.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	21.6%	24.1%	14.4%	12.1%
<i>Total</i>	<i>185</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>185</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	1	1.0%	0.8%	1.4%	0.5%	12	11.4%	7.1%	6.9%	2.7%
Moderate	6	5.7%	5.1%	7.3%	3.1%	16	15.2%	13.0%	18.3%	8.8%
Middle	64	61.0%	56.9%	56.4%	54.3%	31	29.5%	28.9%	27.3%	17.0%
Upper	34	32.4%	37.2%	34.9%	42.1%	35	33.3%	40.0%	39.9%	33.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	10.5%	11.1%	7.6%	37.7%
<i>Total</i>	<i>105</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>105</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	2	2.6%	2.2%	3.6%	1.8%	18	23.4%	15.7%	15.2%	7.4%
Moderate	5	6.5%	3.5%	9.3%	10.0%	19	24.7%	13.4%	23.5%	15.8%
Middle	50	64.9%	66.9%	60.3%	55.3%	20	26.0%	17.8%	25.6%	21.2%
Upper	20	26.0%	27.3%	26.8%	32.9%	18	23.4%	29.3%	34.4%	50.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.6%	23.8%	1.3%	5.3%
<i>Total</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	5.3%	0.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	50.0%	27.4%	36.8%	19.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	50.0%	72.6%	42.1%	43.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	15.8%	36.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	4	1.1%	0.3%	2.1%	0.8%	49	13.2%	5.1%	9.9%	4.5%
Moderate	29	7.8%	11.6%	8.6%	5.1%	95	25.6%	15.3%	23.1%	14.5%
Middle	226	60.9%	61.7%	57.6%	54.5%	76	20.5%	13.7%	24.9%	19.0%
Upper	112	30.2%	26.4%	31.6%	39.5%	94	25.3%	23.6%	32.4%	34.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	57	15.4%	42.3%	9.7%	28.1%
<i>Total</i>	<i>371</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>371</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>		<b>Aggregate</b>		<b>Bank</b>		<b>Aggregate</b>		
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>% \$(000s)</b>
Low	6	3.8%	1.1%			3.2%		1.8%		
Moderate	22	13.8%	14.8%			14.3%		14.2%		
Middle	90	56.3%	53.7%			50.4%		48.5%		
Upper	41	25.6%	29.3%			27.6%		29.3%		
Unknown	1	0.6%	1.1%			1.4%		5.0%		
Tract Unknown	0	0.0%	0.0%			3.1%		1.2%		
<i>Total</i>	<i>160</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>By Revenue</b>										
\$1 Million or Less	101	63.1%	30.6%			42.4%		35.1%		
<b>By Loan Size</b>										
\$100,000 or less	120	75.0%	26.1%			92.9%		36.9%		
\$100,001-\$250,000	20	12.5%	21.2%			4.0%		18.1%		
\$250,001-\$1 Million	20	12.5%	52.6%			3.2%		45.0%		
<i>Total</i>	<i>160</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 28740

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.7%	1.7%
Moderate	3	8.8%	4.0%	10.3%	7.3%	4	11.8%	8.4%	15.6%	10.0%
Middle	24	70.6%	74.3%	72.8%	71.2%	7	20.6%	13.2%	24.3%	21.2%
Upper	7	20.6%	21.7%	16.9%	21.5%	14	41.2%	54.2%	45.7%	57.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	26.5%	24.2%	10.7%	9.8%
<i>Total</i>	<i>34</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>34</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Refinance</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.6%	3.4%
Moderate	3	10.3%	15.4%	8.3%	5.7%	5	17.2%	12.4%	14.6%	9.2%
Middle	19	65.5%	59.3%	74.7%	76.7%	8	27.6%	22.1%	25.2%	19.4%
Upper	7	24.1%	25.4%	17.1%	17.6%	13	44.8%	54.7%	43.4%	45.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	10.3%	10.7%	11.2%	22.3%
<i>Total</i>	<i>29</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>29</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	4	57.1%	27.6%	12.4%	3.8%
Moderate	1	14.3%	3.4%	12.4%	15.3%	1	14.3%	8.6%	21.8%	12.5%
Middle	5	71.4%	75.9%	75.2%	70.5%	1	14.3%	20.7%	23.2%	16.4%
Upper	1	14.3%	20.7%	12.4%	14.2%	1	14.3%	43.1%	38.6%	58.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.0%	8.7%
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	13.0%	32.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	69.6%	59.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	17.4%	7.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>HMDA Totals</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	4	5.6%	0.1%	5.4%	2.6%
Moderate	8	11.3%	41.1%	9.5%	7.6%	10	14.1%	6.5%	15.5%	9.3%
Middle	48	67.6%	43.9%	73.9%	73.6%	16	22.5%	10.9%	24.5%	19.4%
Upper	15	21.1%	14.9%	16.6%	18.7%	28	39.4%	35.0%	43.6%	49.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	18.3%	47.6%	11.0%	19.4%
<i>Total</i>	<i>71</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>71</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank			Aggregate					
		%	% \$(000s)		%	% \$(000s)				
Low	0	0.0%			0.0%					
Moderate	8	14.5%			10.4%					
Middle	35	63.6%			67.0%					
Upper	12	21.8%			18.3%					
Unknown	0	0.0%			0.0%					
Tract Unknown	0	0.0%			4.2%					
<i>Total</i>	<i>55</i>	<i>100.0%</i>			<i>100.0%</i>					
	<b>By Revenue</b>									
\$1 Million or Less	33	60.0%			43.7%					
	<b>By Loan Size</b>									
\$100,000 or less	36	65.5%			97.1%					
\$100,001-\$250,000	9	16.4%			1.4%					
\$250,001-\$1 Million	10	18.2%			65.9%					
<i>Total</i>	<i>55</i>	<i>100.0%</i>			<i>100.0%</i>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 27060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.3%	0.5%	0	0.0%	0.0%	11.0%	5.8%
Moderate	5	33.3%	27.3%	10.1%	8.2%	2	13.3%	17.5%	27.5%	20.0%
Middle	7	46.7%	48.9%	61.5%	58.0%	3	20.0%	12.3%	22.6%	20.4%
Upper	3	20.0%	23.8%	28.1%	33.3%	2	13.3%	19.0%	34.0%	45.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	53.3%	51.2%	4.8%	8.8%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.3%	0.6%	1	7.1%	6.1%	9.6%	5.5%
Moderate	0	0.0%	0.0%	13.3%	10.7%	2	14.3%	10.9%	22.8%	18.2%
Middle	11	78.6%	77.3%	65.2%	62.0%	4	28.6%	25.1%	27.6%	25.8%
Upper	3	21.4%	22.7%	21.2%	26.7%	6	42.9%	53.9%	34.7%	44.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	7.1%	4.1%	5.3%	5.8%
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.5%	1.4%	3	33.3%	17.6%	17.1%	6.3%
Moderate	3	33.3%	32.4%	18.2%	12.2%	5	55.6%	48.6%	28.3%	19.4%
Middle	4	44.4%	25.7%	63.6%	55.1%	0	0.0%	0.0%	22.2%	23.9%
Upper	2	22.2%	41.9%	17.6%	31.3%	1	11.1%	33.8%	29.7%	44.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.7%	5.7%
<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	66.7%	7.3%	22.2%	10.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	44.4%	20.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	33.3%	92.7%	33.3%	68.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.3%	0.6%	4	9.8%	0.7%	11.5%	5.2%
Moderate	10	24.4%	10.9%	12.9%	9.5%	9	22.0%	5.1%	25.6%	17.5%
Middle	22	53.7%	19.0%	63.0%	55.7%	7	17.1%	5.4%	24.0%	20.6%
Upper	9	22.0%	70.1%	23.8%	34.2%	9	22.0%	10.1%	33.0%	40.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	29.3%	78.7%	5.8%	15.9%
<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>41</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	2	3.6%	1.6%		0.8%	0.3%				
Moderate	0	0.0%	0.0%		23.6%	23.3%				
Middle	37	66.1%	71.5%		41.7%	39.9%				
Upper	17	30.4%	26.9%		27.8%	36.0%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		6.1%	0.5%				
<i>Total</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>				
<b>By Revenue</b>										
\$1 Million or Less	36	64.3%	36.3%		42.1%	38.2%				
<b>By Loan Size</b>										
\$100,000 or less	34	60.7%	17.9%		90.4%	29.6%				
\$100,001-\$250,000	14	25.0%	30.3%		4.5%	16.5%				
\$250,001-\$1 Million	8	14.3%	51.9%		5.1%	53.9%				
<i>Total</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>				

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	1.5%	0.5%	0	0.0%	0.0%	6.1%	3.4%
Moderate	7	38.9%	28.8%	21.2%	14.5%	4	22.2%	17.2%	21.7%	14.4%
Middle	5	27.8%	29.6%	38.0%	34.3%	6	33.3%	34.7%	27.6%	25.2%
Upper	6	33.3%	41.7%	39.3%	50.7%	4	22.2%	23.5%	35.8%	48.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	22.2%	24.6%	8.8%	8.3%
<i>Total</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.8%	0.2%	0	0.0%	0.0%	5.7%	2.2%
Moderate	0	0.0%	0.0%	17.9%	41.9%	1	12.5%	9.4%	14.5%	6.9%
Middle	4	50.0%	37.8%	40.3%	24.1%	0	0.0%	0.0%	26.2%	14.0%
Upper	4	50.0%	62.2%	41.0%	33.8%	5	62.5%	68.8%	45.8%	37.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	25.0%	21.8%	7.8%	39.5%
<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.8%	0.7%	1	100.0%	100.0%	8.1%	3.5%
Moderate	0	0.0%	0.0%	24.7%	17.7%	0	0.0%	0.0%	20.1%	13.8%
Middle	1	100.0%	100.0%	40.0%	39.7%	0	0.0%	0.0%	31.7%	24.7%
Upper	0	0.0%	0.0%	33.5%	41.9%	0	0.0%	0.0%	36.5%	54.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.5%	3.6%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	33.3%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	67.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	31.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	1.3%	0.4%	1	3.7%	0.2%	6.5%	2.5%
Moderate	7	25.9%	19.7%	20.8%	26.5%	5	18.5%	14.7%	18.5%	9.7%
Middle	10	37.0%	32.3%	39.4%	32.5%	6	22.2%	23.8%	28.1%	17.8%
Upper	10	37.0%	48.0%	38.5%	40.6%	9	33.3%	37.7%	39.7%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	22.2%	23.7%	7.2%	30.1%
<i>Total</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0		0.0%		0.0%		16.7%		23.5%	
Moderate	4		30.8%		80.1%		24.7%		36.4%	
Middle	7		53.8%		17.7%		29.6%		14.5%	
Upper	2		15.4%		2.2%		27.9%		24.7%	
Unknown	0		0.0%		0.0%		0.0%		0.0%	
Tract Unknown	0		0.0%		0.0%		1.0%		0.9%	
<i>Total</i>	<i>13</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	
<b>By Revenue</b>										
\$1 Million or Less	5		38.5%		11.3%		31.9%		25.1%	
<b>By Loan Size</b>										
\$100,000 or less	10		76.9%		22.6%		88.5%		24.7%	
\$100,001-\$250,000	0		0.0%		0.0%		6.0%		20.7%	
\$250,001-\$1 Million	3		23.1%		77.4%		5.4%		54.7%	
<i>Total</i>	<i>13</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	

Originations and Purchases



**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: NY Non-MSA Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.1%	0.1%	22	9.4%	5.2%	6.7%	3.7%
Moderate	27	11.5%	6.8%	8.4%	6.1%	78	33.2%	24.2%	24.3%	18.1%
Middle	170	72.3%	75.2%	78.6%	78.2%	56	23.8%	24.0%	23.2%	21.2%
Upper	38	16.2%	18.0%	12.9%	15.7%	52	22.1%	34.1%	33.5%	46.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	27	11.5%	12.5%	12.2%	10.7%
<b>Total</b>	<b>235</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>235</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.2%	0.1%	4	3.4%	1.8%	6.3%	2.7%
Moderate	5	4.2%	2.4%	5.9%	3.2%	11	9.3%	6.0%	17.3%	8.9%
Middle	97	82.2%	83.2%	79.4%	84.2%	26	22.0%	19.6%	25.3%	16.4%
Upper	16	13.6%	14.3%	14.4%	12.5%	56	47.5%	51.8%	42.6%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	17.8%	20.8%	8.5%	31.6%
<b>Total</b>	<b>118</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>118</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	14	16.9%	6.7%	11.8%	5.8%
Moderate	6	7.2%	9.2%	6.4%	3.8%	21	25.3%	7.4%	23.1%	14.6%
Middle	68	81.9%	77.0%	83.5%	85.6%	23	27.7%	27.9%	27.6%	24.2%
Upper	9	10.8%	13.8%	10.0%	10.5%	20	24.1%	14.4%	33.9%	49.8%
Unknown	0	0.0%	0.0%	0.1%	0.0%	5	6.0%	43.6%	3.5%	5.5%
<b>Total</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	70.6%	51.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	29.4%	48.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.1%	0.1%	40	9.1%	3.8%	7.6%	3.3%
Moderate	38	8.7%	5.1%	7.1%	4.4%	110	25.1%	16.4%	21.4%	13.1%
Middle	337	76.9%	78.9%	79.9%	80.7%	105	24.0%	21.8%	24.8%	18.6%
Upper	63	14.4%	15.9%	12.9%	14.8%	128	29.2%	38.5%	36.9%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	55	12.6%	19.5%	9.3%	22.5%
<b>Total</b>	<b>438</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>438</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%		1.1%	0.8%		
Moderate	17	11.2%	13.3%	10.8%	9.9%					
Middle	117	77.0%	73.2%	74.9%	78.2%					
Upper	18	11.8%	13.4%	10.1%	10.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.2%	0.9%					
<b>Total</b>	<b>152</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	78	51.3%	24.2%	47.2%	36.7%					
<b>By Loan Size</b>										
\$100,000 or less	93	61.2%	13.5%	89.8%	32.1%					
\$100,001-\$250,000	28	18.4%	21.0%	5.8%	20.0%					
\$250,001-\$1 Million	31	20.4%	65.6%	4.4%	47.9%					
<b>Total</b>	<b>152</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: NY Non-MSA Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	1	1.0%	0.4%	1.5%	0.8%	6	6.1%	2.3%	5.5%	3.2%
Moderate	2	2.0%	1.8%	1.2%	1.0%	23	23.2%	18.2%	21.8%	16.1%
Middle	77	77.8%	70.7%	73.3%	69.1%	23	23.2%	22.7%	25.1%	23.6%
Upper	19	19.2%	27.0%	24.0%	29.1%	27	27.3%	35.3%	33.8%	45.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	20.2%	21.6%	13.8%	11.8%
<i>Total</i>	<i>99</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>99</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.5%	0.2%	2	3.3%	1.5%	5.2%	2.2%
Moderate	4	6.7%	8.2%	0.7%	0.4%	4	6.7%	4.1%	14.8%	7.7%
Middle	38	63.3%	56.6%	73.7%	77.4%	17	28.3%	21.8%	25.9%	16.4%
Upper	18	30.0%	35.2%	25.1%	22.0%	25	41.7%	53.4%	44.0%	39.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	20.0%	19.3%	10.2%	34.3%
<i>Total</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.5%	0.4%	3	9.7%	1.2%	11.0%	3.9%
Moderate	0	0.0%	0.0%	0.6%	0.3%	6	19.4%	2.4%	23.5%	15.9%
Middle	24	77.4%	95.9%	81.0%	78.8%	4	12.9%	2.0%	27.0%	21.8%
Upper	7	22.6%	4.1%	18.0%	20.4%	16	51.6%	67.7%	36.8%	52.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	6.5%	26.7%	1.7%	5.6%
<i>Total</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	7.7%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	7.7%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	69.2%	94.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	15.4%	4.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	1	0.5%	0.2%	0.9%	0.5%	11	5.8%	1.9%	6.5%	2.6%
Moderate	6	3.2%	4.0%	0.9%	0.7%	33	17.4%	12.0%	19.4%	11.4%
Middle	139	73.2%	67.3%	75.0%	74.6%	44	23.2%	20.9%	25.7%	19.1%
Upper	44	23.2%	28.4%	23.2%	24.2%	68	35.8%	44.2%	38.2%	41.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	34	17.9%	21.1%	10.2%	25.6%
<i>Total</i>	<i>190</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>190</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Low	8	9.9%	25.7%	3.2%	6.1%					
Moderate	1	1.2%	0.6%	1.4%	1.1%					
Middle	60	74.1%	66.8%	68.6%	69.3%					
Upper	12	14.8%	6.9%	22.1%	22.7%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	4.7%	0.8%					
<i>Total</i>	<i>81</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
<b>By Revenue</b>										
\$1 Million or Less	52	64.2%	39.2%	44.1%	35.6%					
<b>By Loan Size</b>										
\$100,000 or less	64	79.0%	35.0%	90.5%	32.0%					
\$100,001-\$250,000	7	8.6%	17.2%	5.1%	17.9%					
\$250,001-\$1 Million	10	12.3%	47.8%	4.5%	50.0%					
<i>Total</i>	<i>81</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: NY Non-MSA Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	0.7%
Moderate	7	17.1%	11.1%	11.3%	7.1%	9	22.0%	9.6%	10.0%	5.3%
Middle	25	61.0%	62.3%	57.9%	63.2%	6	14.6%	12.5%	19.1%	15.1%
Upper	9	22.0%	26.6%	30.8%	29.7%	21	51.2%	64.1%	54.9%	65.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	12.2%	13.8%	13.9%	13.6%
<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>41</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.1%	1.1%
Moderate	0	0.0%	0.0%	8.1%	2.9%	0	0.0%	0.0%	9.8%	3.3%
Middle	7	53.8%	56.0%	50.1%	75.9%	2	15.4%	11.6%	21.3%	8.6%
Upper	6	46.2%	44.0%	41.8%	21.1%	8	61.5%	72.9%	54.2%	31.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	23.1%	15.5%	11.6%	55.2%
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	13.0%	3.3%
Moderate	0	0.0%	0.0%	15.2%	9.4%	0	0.0%	0.0%	21.7%	10.2%
Middle	1	50.0%	71.4%	45.7%	62.1%	0	0.0%	0.0%	15.2%	11.9%
Upper	1	50.0%	28.6%	39.1%	28.5%	0	0.0%	0.0%	50.0%	74.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	83.3%	64.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	35.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	3.6%	0.1%	3.1%	1.0%
Moderate	7	12.5%	8.5%	10.2%	6.2%	9	16.1%	7.4%	10.3%	3.9%
Middle	33	58.9%	60.8%	53.0%	69.6%	8	14.3%	12.3%	19.9%	10.3%
Upper	16	28.6%	30.7%	36.7%	24.2%	29	51.8%	66.1%	54.0%	41.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	14.3%	14.1%	12.6%	43.8%
<i>Total</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Moderate	2	15.4%	17.4%	17.4%	23.7%	23.7%	22.5%	22.5%	22.5%	
Middle	9	69.2%	36.3%	36.3%	44.1%	44.1%	42.0%	42.0%	42.0%	
Upper	2	15.4%	46.3%	46.3%	25.6%	25.6%	31.5%	31.5%	31.5%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	6.6%	4.0%	4.0%	4.0%	
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
<b>By Revenue</b>										
\$1 Million or Less	4	30.8%	11.2%	11.2%	44.1%	44.1%	36.8%	36.8%	36.8%	
<b>By Loan Size</b>										
\$100,000 or less	8	61.5%	20.8%	20.8%	98.0%	98.0%	66.2%	66.2%	66.2%	
\$100,001-\$250,000	1	7.7%	5.1%	5.1%	1.1%	1.1%	9.0%	9.0%	9.0%	
\$250,001-\$1 Million	4	30.8%	74.1%	74.1%	1.0%	1.0%	24.9%	24.9%	24.9%	
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: NY Non-MSA Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	Bank % \$(000s)	%	Aggregate % \$(000s)	#	%	Bank % \$(000s)	%	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.1%	0.9%
Moderate	4	17.4%	11.8%	11.3%	8.4%	3	13.0%	11.5%	15.8%	10.9%
Middle	18	78.3%	84.1%	68.8%	70.7%	3	13.0%	8.4%	26.9%	24.7%
Upper	1	4.3%	4.1%	19.9%	20.9%	12	52.2%	66.2%	43.5%	50.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	21.7%	13.9%	11.7%	12.7%
<b>Total</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.8%	1.2%
Moderate	3	21.4%	14.3%	6.9%	4.6%	3	21.4%	9.1%	11.6%	7.2%
Middle	10	71.4%	65.0%	73.2%	75.3%	1	7.1%	5.6%	21.0%	16.2%
Upper	1	7.1%	20.7%	19.7%	20.0%	5	35.7%	57.5%	40.8%	45.3%
Unknown	0	0.0%	0.0%	0.1%	0.0%	5	35.7%	27.7%	23.8%	30.0%
<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.7%	3.3%
Moderate	2	40.0%	54.1%	6.7%	4.3%	1	20.0%	10.8%	17.8%	13.6%
Middle	2	40.0%	29.7%	71.1%	68.9%	1	20.0%	18.9%	28.3%	22.3%
Upper	1	20.0%	16.2%	21.9%	26.2%	3	60.0%	70.3%	44.9%	58.0%
Unknown	0	0.0%	0.0%	0.3%	0.6%	0	0.0%	0.0%	2.3%	2.8%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.0%	1.1%
Moderate	9	21.4%	12.9%	8.7%	6.3%	7	16.7%	10.8%	14.3%	9.0%
Middle	30	71.4%	77.7%	71.1%	73.7%	5	11.9%	7.6%	24.5%	20.1%
Upper	3	7.1%	9.4%	20.1%	20.0%	20	47.6%	63.4%	42.5%	46.9%
Unknown	0	0.0%	0.0%	0.1%	0.0%	10	23.8%	18.2%	15.7%	22.8%
<b>Total</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank			Aggregate					
		%	% \$(000s)	%	% \$(000s)	%	% \$(000s)			
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
Moderate	1	7.7%		3.0%		13.8%				15.9%
Middle	10	76.9%		91.8%		63.7%				61.5%
Upper	2	15.4%		5.2%		20.3%				21.9%
Unknown	0	0.0%		0.0%		0.0%				0.0%
Tract Unknown	0	0.0%		0.0%		2.2%				0.6%
<b>Total</b>	<b>13</b>	<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>				<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	5	38.5%		37.3%		40.9%				38.3%
<b>By Loan Size</b>										
\$100,000 or less	4	30.8%		7.7%		88.2%				32.5%
\$100,001-\$250,000	4	30.8%		16.8%		7.2%				24.0%
\$250,001-\$1 Million	5	38.5%		75.5%		4.7%				43.5%
<b>Total</b>	<b>13</b>	<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>				<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 12580

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	%	% \$(000s)	#	Bank %	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	25	4.3%	2.3%	3.4%	1.8%	31	5.3%	2.4%	7.4%	3.4%
Moderate	112	19.2%	11.2%	13.5%	7.8%	104	17.9%	11.4%	20.3%	14.4%
Middle	241	41.4%	38.2%	40.6%	36.6%	68	11.7%	11.0%	20.8%	19.8%
Upper	204	35.1%	48.3%	42.5%	53.8%	120	20.6%	32.6%	34.2%	47.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	259	44.5%	42.7%	17.4%	14.9%
<b>Total</b>	<b>582</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>582</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	46	4.4%	2.4%	2.8%	5.5%	56	5.3%	2.3%	6.9%	2.9%
Moderate	174	16.6%	11.4%	11.5%	12.5%	123	11.7%	8.0%	14.8%	8.1%
Middle	425	40.6%	37.7%	38.4%	31.7%	134	12.8%	11.9%	19.5%	13.3%
Upper	403	38.5%	48.6%	47.3%	50.3%	251	24.0%	32.3%	37.5%	36.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	484	46.2%	45.5%	21.3%	39.5%
<b>Total</b>	<b>1,048</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,048</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	42	13.8%	25.5%	5.9%	2.4%	76	24.9%	7.1%	12.6%	4.1%
Moderate	61	20.0%	16.0%	14.9%	6.7%	76	24.9%	23.1%	21.8%	13.7%
Middle	150	49.2%	47.0%	37.5%	31.3%	77	25.2%	21.7%	24.5%	19.4%
Upper	52	17.0%	11.5%	41.6%	59.7%	67	22.0%	19.6%	35.2%	49.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	3.0%	28.5%	5.9%	12.8%
<b>Total</b>	<b>305</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>305</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	6	27.3%	2.0%	22.8%	6.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	9.1%	14.2%	31.0%	29.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	9	40.9%	19.4%	27.7%	45.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	5	22.7%	64.3%	18.5%	18.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	119	6.1%	2.6%	3.2%	4.3%	163	8.3%	1.9%	7.3%	3.0%
Moderate	349	17.8%	12.1%	12.3%	11.5%	303	15.5%	7.4%	17.0%	9.9%
Middle	825	42.2%	33.8%	39.1%	33.8%	279	14.3%	9.0%	20.1%	15.0%
Upper	664	33.9%	51.5%	45.4%	50.4%	438	22.4%	24.8%	36.2%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	774	39.6%	56.8%	19.4%	33.4%
<b>Total</b>	<b>1,957</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,957</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank %	% \$(000s)	%	% \$(000s)	#	Bank %	% \$(000s)	%	% \$(000s)
Low	44	4.9%	5.7%	5.3%	5.1%					
Moderate	153	17.0%	16.8%	11.4%	11.0%					
Middle	332	36.9%	36.8%	36.5%	37.7%					
Upper	366	40.7%	40.1%	45.2%	45.2%					
Unknown	4	0.4%	0.5%	0.2%	0.4%					
Tract Unknown	0	0.0%	0.0%	1.3%	0.6%					
<b>Total</b>	<b>899</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	427	47.5%	30.3%	47.4%	29.4%					
	<b>By Loan Size</b>									
\$100,000 or less	511	56.8%	15.4%	92.2%	31.7%					
\$100,001-\$250,000	201	22.4%	23.9%	3.7%	15.7%					
\$250,001-\$1 Million	187	20.8%	60.8%	4.1%	52.6%					
<b>Total</b>	<b>899</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25180

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	1	1.8%	2.3%	1.2%	0.7%	6	10.9%	7.8%	7.9%	4.3%
Moderate	11	20.0%	13.9%	14.2%	9.8%	17	30.9%	27.1%	20.2%	15.7%
Middle	28	50.9%	47.4%	55.7%	55.2%	11	20.0%	14.3%	24.4%	24.9%
Upper	15	27.3%	36.4%	29.0%	34.3%	12	21.8%	34.9%	27.4%	35.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	16.4%	15.9%	20.1%	19.3%
<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.8%	0.5%	7	6.9%	3.7%	6.4%	3.9%
Moderate	11	10.9%	9.0%	12.2%	8.4%	19	18.8%	13.2%	13.2%	9.5%
Middle	57	56.4%	53.7%	51.4%	48.5%	14	13.9%	10.6%	19.5%	16.7%
Upper	33	32.7%	37.3%	35.5%	42.6%	30	29.7%	39.2%	39.4%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	31	30.7%	33.3%	21.5%	26.1%
<i>Total</i>	<i>101</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>101</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.1%	3.5%	6	27.3%	23.1%	8.9%	2.8%
Moderate	6	27.3%	23.1%	12.3%	7.6%	3	13.6%	5.1%	16.2%	13.5%
Middle	9	40.9%	46.8%	53.1%	40.3%	6	27.3%	21.2%	26.3%	23.7%
Upper	7	31.8%	30.1%	33.5%	48.7%	7	31.8%	50.6%	44.7%	55.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.9%	4.2%
<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	9.1%	0.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	54.5%	34.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	36.4%	64.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	1	0.6%	0.7%	1.0%	0.6%	19	10.7%	5.2%	7.0%	3.9%
Moderate	28	15.7%	10.7%	13.0%	10.0%	39	21.9%	17.6%	16.0%	11.4%
Middle	94	52.8%	51.6%	53.0%	51.6%	31	17.4%	11.8%	21.5%	19.0%
Upper	55	30.9%	37.0%	32.9%	37.8%	49	27.5%	37.9%	35.0%	39.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	22.5%	27.5%	20.5%	26.7%
<i>Total</i>	<i>178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	7	7.5%	5.3%	7.6%	7.2%					
Moderate	14	15.1%	15.1%	15.1%	18.3%					
Middle	36	38.7%	38.4%	47.9%	47.1%					
Upper	36	38.7%	41.2%	28.0%	26.9%					
Unknown	0	0.0%	0.0%	0.1%	0.0%					
Tract Unknown	0	0.0%	0.0%	1.3%	0.5%					
<i>Total</i>	<i>93</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
<b>By Revenue</b>										
\$1 Million or Less	52	55.9%	25.5%	41.0%	33.4%					
<b>By Loan Size</b>										
\$100,000 or less	56	60.2%	16.2%	88.9%	25.0%					
\$100,001-\$250,000	22	23.7%	23.1%	5.9%	19.2%					
\$250,001-\$1 Million	15	16.1%	60.6%	5.2%	55.8%					
<i>Total</i>	<i>93</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.2%	0.1%	0	0.0%	0.0%	6.6%	3.4%
Moderate	2	20.0%	5.3%	8.1%	5.4%	2	20.0%	20.4%	21.3%	17.6%
Middle	4	40.0%	44.2%	66.3%	63.9%	3	30.0%	30.2%	22.2%	21.4%
Upper	4	40.0%	50.4%	25.5%	30.6%	5	50.0%	49.4%	30.5%	39.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	19.4%	17.8%
<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	4.8%	4.4%	6.5%	2.6%
Moderate	4	19.0%	19.6%	8.7%	25.8%	5	23.8%	20.9%	15.3%	7.4%
Middle	13	61.9%	63.7%	64.7%	54.6%	3	14.3%	13.5%	20.8%	11.6%
Upper	4	19.0%	16.7%	26.6%	19.6%	3	14.3%	11.0%	41.0%	28.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	42.9%	50.2%	16.5%	49.6%
<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	2	15.4%	59.3%	2.6%	2.4%	3	23.1%	5.5%	11.3%	4.2%
Moderate	4	30.8%	11.9%	9.6%	3.9%	0	0.0%	0.0%	18.3%	10.6%
Middle	3	23.1%	9.9%	65.2%	64.5%	6	46.2%	25.3%	30.4%	34.5%
Upper	4	30.8%	19.0%	22.6%	29.1%	2	15.4%	9.9%	28.7%	32.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	15.4%	59.3%	11.3%	17.7%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	100.0%	100.0%	83.3%	76.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	23.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	2	4.3%	0.5%	0.2%	0.1%	4	8.5%	0.5%	6.7%	2.7%
Moderate	10	21.3%	2.3%	8.5%	18.3%	7	14.9%	3.1%	17.7%	9.8%
Middle	23	48.9%	92.7%	65.4%	58.6%	12	25.5%	3.2%	21.7%	13.9%
Upper	12	25.5%	4.5%	26.0%	23.0%	10	21.3%	3.8%	36.3%	30.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	29.8%	89.4%	17.6%	43.6%
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	0		0.0%		0.0%		1.3%		0.9%	
Moderate	6		14.0%		8.0%		16.7%		18.5%	
Middle	26		60.5%		52.6%		60.5%		58.9%	
Upper	11		25.6%		39.3%		20.1%		21.3%	
Unknown	0		0.0%		0.0%		0.0%		0.0%	
Tract Unknown	0		0.0%		0.0%		1.4%		0.5%	
<b>Total</b>	<b>43</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	
<b>By Revenue</b>										
\$1 Million or Less	17		39.5%		30.9%		50.3%		48.2%	
<b>By Loan Size</b>										
\$100,000 or less	18		41.9%		6.3%		88.2%		27.7%	
\$100,001-\$250,000	14		32.6%		30.8%		6.4%		20.9%	
\$250,001-\$1 Million	11		25.6%		63.0%		5.5%		51.4%	
<b>Total</b>	<b>43</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD Non-MSA Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	1.0%	0.3%	3	11.1%	8.2%	12.4%	5.7%
Moderate	6	22.2%	19.7%	17.5%	11.5%	10	37.0%	35.7%	25.0%	16.7%
Middle	20	74.1%	76.0%	73.0%	71.2%	7	25.9%	23.0%	16.2%	13.7%
Upper	1	3.7%	4.4%	8.4%	17.0%	4	14.8%	20.9%	27.4%	41.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	11.1%	12.1%	18.9%	22.5%
<i>Total</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	1	3.2%	2.7%	1.1%	0.4%	8	25.8%	16.7%	10.4%	3.5%
Moderate	3	9.7%	5.8%	15.6%	8.7%	5	16.1%	13.2%	15.9%	7.0%
Middle	26	83.9%	87.1%	71.6%	75.4%	5	16.1%	10.2%	19.6%	10.3%
Upper	1	3.2%	4.3%	11.7%	15.5%	5	16.1%	31.7%	33.5%	30.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	25.8%	28.2%	20.6%	48.5%
<i>Total</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.9%	0.6%	2	18.2%	4.1%	13.3%	5.5%
Moderate	1	9.1%	3.1%	15.8%	14.6%	4	36.4%	20.6%	22.8%	15.1%
Middle	8	72.7%	92.8%	68.4%	61.8%	2	18.2%	28.9%	22.2%	20.3%
Upper	2	18.2%	4.1%	13.9%	23.0%	3	27.3%	46.4%	23.4%	37.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	18.4%	21.3%
<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	1	1.4%	1.4%	1.1%	0.4%	13	18.8%	12.7%	11.1%	4.1%
Moderate	10	14.5%	12.2%	16.2%	9.5%	19	27.5%	23.7%	19.1%	9.5%
Middle	54	78.3%	82.0%	71.9%	74.2%	14	20.3%	16.3%	18.6%	11.2%
Upper	4	5.8%	4.3%	10.8%	16.0%	12	17.4%	26.8%	31.1%	33.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	15.9%	20.4%	20.0%	41.6%
<i>Total</i>	<i>69</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>69</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate			Aggregate		
	#	%	% \$(000s)	%	% \$(000s)		%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	1.1%	0.0%		1.1%	1.6%		
Moderate	5	33.3%		55.0%			17.7%	23.9%		
Middle	10	66.7%		45.0%			66.6%	65.4%		
Upper	0	0.0%		0.0%			11.6%	8.3%		
Unknown	0	0.0%		0.0%			0.0%	0.0%		
Tract Unknown	0	0.0%		0.0%			3.0%	0.8%		
<i>Total</i>	<i>15</i>	<i>100.0%</i>		<i>100.0%</i>			<i>100.0%</i>	<i>100.0%</i>		
<b>By Revenue</b>										
\$1 Million or Less	9	60.0%		41.8%			44.9%	39.8%		
<b>By Loan Size</b>										
\$100,000 or less	5	33.3%		3.2%			93.4%	34.2%		
\$100,001-\$250,000	4	26.7%		18.8%			3.1%	15.9%		
\$250,001-\$1 Million	6	40.0%		78.0%			3.5%	49.9%		
<i>Total</i>	<i>15</i>	<i>100.0%</i>		<i>100.0%</i>			<i>100.0%</i>	<i>100.0%</i>		

Originations and Purchases



**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD Non-MSA Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	1.3%
Moderate	0	0.0%	0.0%	3.7%	2.6%	0	0.0%	0.0%	18.5%	14.2%
Middle	1	20.0%	20.2%	18.1%	17.0%	0	0.0%	0.0%	30.0%	29.2%
Upper	4	80.0%	79.8%	78.1%	80.4%	0	0.0%	0.0%	34.6%	42.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	14.0%	12.9%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.7%	1.9%
Moderate	0	0.0%	0.0%	3.0%	2.9%	4	22.2%	20.6%	8.7%	5.4%
Middle	2	11.1%	7.1%	18.0%	15.1%	1	5.6%	5.5%	17.6%	12.8%
Upper	16	88.9%	92.9%	79.0%	81.9%	2	11.1%	9.3%	45.3%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	61.1%	64.6%	24.7%	39.9%
<b>Total</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	21.1%	5.0%	2.2%
Moderate	0	0.0%	0.0%	3.0%	1.4%	0	0.0%	0.0%	13.4%	9.3%
Middle	2	50.0%	34.2%	19.9%	20.3%	2	50.0%	65.8%	22.4%	17.2%
Upper	2	50.0%	65.8%	77.1%	78.4%	1	25.0%	13.2%	53.7%	55.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.5%	16.2%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	80.0%	53.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	20.0%	46.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	3.7%	0.2%	3.5%	1.7%
Moderate	0	0.0%	0.0%	3.2%	2.7%	4	14.8%	15.2%	12.2%	8.1%
Middle	5	18.5%	10.6%	18.1%	17.4%	3	11.1%	4.6%	22.1%	17.7%
Upper	22	81.5%	89.4%	78.6%	79.9%	3	11.1%	7.0%	41.8%	39.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	59.3%	73.1%	20.4%	33.3%
<b>Total</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	0		0.0%		0.0%		0.0%		0.0%	
Moderate	0		0.0%		0.0%		4.1%		5.6%	
Middle	1		16.7%		6.7%		19.4%		14.6%	
Upper	5		83.3%		93.3%		73.2%		78.8%	
Unknown	0		0.0%		0.0%		0.0%		0.0%	
Tract Unknown	0		0.0%		0.0%		3.3%		0.9%	
<b>Total</b>	<b>6</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	
<b>By Revenue</b>										
\$1 Million or Less	4		66.7%		14.9%		45.6%		32.0%	
<b>By Loan Size</b>										
\$100,000 or less	4		66.7%		14.9%		90.3%		25.6%	
\$100,001-\$250,000	1		16.7%		24.3%		3.8%		11.4%	
\$250,001-\$1 Million	1		16.7%		60.8%		5.9%		63.0%	
<b>Total</b>	<b>6</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD Non-MSA Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	7.7%	4.1%	5.3%	2.7%
Moderate	1	7.7%	3.6%	7.9%	5.7%	1	7.7%	3.6%	11.7%	8.5%
Middle	12	92.3%	96.4%	92.1%	94.3%	0	0.0%	0.0%	14.1%	11.3%
Upper	0	0.0%	0.0%	0.0%	0.0%	9	69.2%	84.3%	57.1%	61.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	15.4%	8.0%	11.9%	16.5%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	6.7%	3.2%	6.8%	3.3%
Moderate	5	16.7%	15.9%	7.7%	16.6%	4	13.3%	7.9%	11.9%	7.4%
Middle	25	83.3%	84.1%	92.3%	83.4%	3	10.0%	7.6%	17.8%	13.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	10	33.3%	31.2%	53.5%	50.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	36.7%	50.0%	10.1%	26.1%
<b>Total</b>	<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	60.0%	47.7%	14.1%	4.6%
Moderate	0	0.0%	0.0%	16.3%	21.2%	1	20.0%	6.8%	27.2%	16.8%
Middle	5	100.0%	100.0%	83.7%	78.8%	1	20.0%	45.5%	20.7%	23.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	28.3%	51.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.8%	4.0%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	6	12.5%	3.7%	6.3%	3.1%
Moderate	6	12.5%	12.6%	8.0%	12.8%	6	12.5%	6.8%	12.1%	7.9%
Middle	42	87.5%	87.4%	92.0%	87.2%	4	8.3%	5.8%	16.5%	12.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	19	39.6%	44.8%	54.3%	53.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	27.1%	38.9%	10.8%	22.6%
<b>Total</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	#	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%
Moderate	4	15.4%	10.0%	10.0%	10.0%		17.6%	18.1%		18.1%
Middle	22	84.6%	90.0%	90.0%	90.0%		79.8%	81.5%		81.5%
Upper	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%		2.6%	0.4%		0.4%
<b>Total</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	15	57.7%	34.9%	47.9%	36.9%					
<b>By Loan Size</b>										
\$100,000 or less	11	42.3%	6.4%	90.6%	25.3%					
\$100,001-\$250,000	7	26.9%	22.6%	3.8%	13.1%					
\$250,001-\$1 Million	8	30.8%	71.0%	5.6%	61.6%					
<b>Total</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD Non-MSA Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	38.5%	12.1%	9.3%	3.4%
Moderate	6	46.2%	16.0%	28.5%	15.8%	2	15.4%	5.7%	16.0%	7.7%
Middle	7	53.8%	84.0%	71.5%	84.2%	0	0.0%	0.0%	12.0%	7.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	30.8%	70.7%	56.5%	75.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	15.4%	11.5%	6.2%	5.5%
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	9.1%	5.7%	8.6%	3.5%
Moderate	12	54.5%	49.6%	33.3%	20.8%	3	13.6%	10.4%	15.8%	9.0%
Middle	10	45.5%	50.4%	66.7%	79.2%	6	27.3%	27.8%	17.6%	12.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	9	40.9%	48.5%	45.4%	64.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	9.1%	7.5%	12.6%	10.7%
<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	33.3%	42.5%	13.6%	1.2%
Moderate	4	66.7%	67.5%	51.5%	35.2%	1	16.7%	12.5%	13.6%	10.0%
Middle	2	33.3%	32.5%	48.5%	64.8%	1	16.7%	12.5%	24.2%	23.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	33.3%	32.5%	34.8%	51.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.6%	13.9%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	9	22.0%	8.9%	9.1%	3.4%
Moderate	22	53.7%	34.0%	32.7%	19.4%	6	14.6%	8.2%	15.8%	8.5%
Middle	19	46.3%	66.0%	67.3%	80.6%	7	17.1%	14.8%	16.0%	10.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	15	36.6%	58.8%	48.5%	68.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	9.8%	9.3%	10.6%	8.9%
<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>41</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	0		0.0%		0.0%		0.0%		0.0%	
Moderate	14		53.8%		20.0%		41.7%		44.2%	
Middle	12		46.2%		80.0%		55.3%		54.6%	
Upper	0		0.0%		0.0%		0.0%		0.0%	
Unknown	0		0.0%		0.0%		0.0%		0.0%	
Tract Unknown	0		0.0%		0.0%		2.9%		1.2%	
<i>Total</i>	<i>26</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	
<b>By Revenue</b>										
\$1 Million or Less	22		84.6%		38.7%		35.5%		37.9%	
<b>By Loan Size</b>										
\$100,000 or less	23		88.5%		38.7%		88.8%		35.5%	
\$100,001-\$250,000	1		3.8%		4.9%		7.5%		26.0%	
\$250,001-\$1 Million	2		7.7%		56.4%		3.7%		38.4%	
<i>Total</i>	<i>26</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 49620

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	4	1.6%	0.7%	2.0%	0.9%	21	8.5%	4.9%	10.1%	5.9%
Moderate	14	5.7%	3.6%	5.5%	3.6%	71	28.7%	22.8%	24.3%	19.8%
Middle	160	64.8%	59.2%	67.8%	65.3%	67	27.1%	26.3%	24.4%	24.8%
Upper	69	27.9%	36.4%	24.8%	30.2%	64	25.9%	35.8%	26.9%	36.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	9.7%	10.3%	14.2%	13.3%
<b>Total</b>	<b>247</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>247</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	8	2.9%	2.5%	1.2%	0.5%	14	5.0%	2.8%	7.0%	3.1%
Moderate	16	5.7%	3.9%	5.0%	2.5%	44	15.8%	12.0%	16.5%	9.2%
Middle	185	66.3%	64.0%	69.0%	69.7%	57	20.4%	19.4%	23.4%	16.3%
Upper	70	25.1%	29.5%	24.8%	27.2%	77	27.6%	34.5%	34.5%	31.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	87	31.2%	31.3%	18.5%	40.0%
<b>Total</b>	<b>279</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>279</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	3	5.2%	1.7%	3.0%	1.5%	7	12.1%	4.7%	11.5%	7.1%
Moderate	7	12.1%	4.0%	4.4%	2.5%	14	24.1%	13.4%	22.5%	17.1%
Middle	38	65.5%	82.7%	69.3%	71.1%	16	27.6%	16.4%	25.9%	22.7%
Upper	10	17.2%	11.6%	23.3%	25.0%	21	36.2%	65.6%	37.2%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	5.0%
<b>Total</b>	<b>58</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>58</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	15.2%	3.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	23.9%	8.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	100.0%	100.0%	56.5%	86.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	4.3%	1.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	15	2.6%	1.0%	1.7%	0.8%	42	7.1%	2.2%	8.4%	4.0%
Moderate	37	6.3%	2.2%	5.2%	3.1%	129	21.9%	10.1%	19.7%	12.5%
Middle	387	65.8%	77.6%	68.5%	68.8%	140	23.8%	13.3%	23.9%	18.7%
Upper	149	25.3%	19.2%	24.6%	27.3%	162	27.6%	20.8%	31.7%	32.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	115	19.6%	53.5%	16.3%	32.6%
<b>Total</b>	<b>588</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>588</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>
Low	14	6.0%	2.9%	5.7%	5.7%	5.0%	5.7%	5.0%	5.7%	5.0%
Moderate	18	7.7%	5.9%	8.3%	8.3%	9.0%	8.3%	9.0%	8.3%	9.0%
Middle	156	67.0%	74.3%	64.8%	64.8%	67.8%	64.8%	67.8%	64.8%	67.8%
Upper	45	19.3%	16.9%	19.0%	19.0%	17.7%	19.0%	17.7%	19.0%	17.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>233</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	123	52.8%	40.8%	44.6%	44.6%	38.8%	44.6%	38.8%	44.6%	38.8%
<b>By Loan Size</b>										
\$100,000 or less	127	54.5%	15.2%	90.0%	90.0%	28.6%	90.0%	28.6%	90.0%	28.6%
\$100,001-\$250,000	59	25.3%	26.5%	5.1%	5.1%	18.3%	5.1%	18.3%	5.1%	18.3%
\$250,001-\$1 Million	47	20.2%	58.3%	4.8%	4.8%	53.1%	4.8%	53.1%	4.8%	53.1%
<b>Total</b>	<b>233</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25420

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	2	1.8%	0.7%	0.9%	0.4%	10	8.8%	4.3%	8.5%	4.4%
Moderate	17	15.0%	27.9%	12.7%	8.2%	12	10.6%	5.8%	23.0%	16.8%
Middle	59	52.2%	41.0%	49.4%	42.3%	18	15.9%	12.8%	23.1%	20.7%
Upper	35	31.0%	30.5%	36.9%	49.1%	21	18.6%	21.5%	32.8%	41.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	52	46.0%	55.6%	12.5%	16.9%
<b>Total</b>	<b>113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	1	0.6%	0.2%	0.9%	0.3%	11	6.4%	3.5%	6.1%	2.7%
Moderate	32	18.6%	27.8%	11.4%	6.5%	28	16.3%	10.7%	16.3%	9.0%
Middle	83	48.3%	39.1%	49.9%	55.0%	31	18.0%	12.5%	22.3%	14.4%
Upper	56	32.6%	32.9%	37.8%	38.1%	38	22.1%	26.9%	38.6%	36.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	64	37.2%	46.3%	16.7%	37.9%
<b>Total</b>	<b>172</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>172</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	2	3.8%	1.3%	1.0%	0.4%	11	20.8%	6.7%	11.6%	5.8%
Moderate	9	17.0%	11.4%	11.8%	8.4%	17	32.1%	21.2%	19.9%	14.8%
Middle	28	52.8%	28.8%	52.4%	49.7%	9	17.0%	10.4%	24.6%	20.0%
Upper	14	26.4%	58.5%	34.8%	41.6%	14	26.4%	31.9%	42.5%	55.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.8%	29.8%	1.4%	4.0%
<b>Total</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	3.0%	2.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	50.0%	97.8%	52.2%	57.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	35.8%	25.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	50.0%	2.2%	9.0%	14.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	5	1.5%	0.3%	0.9%	0.4%	32	9.4%	2.7%	7.4%	3.3%
Moderate	60	17.5%	48.6%	12.0%	9.1%	57	16.7%	6.2%	18.9%	11.6%
Middle	170	49.7%	27.9%	49.9%	49.2%	58	17.0%	8.8%	22.7%	16.3%
Upper	107	31.3%	23.3%	37.2%	41.3%	73	21.3%	17.3%	36.7%	37.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	122	35.7%	64.9%	14.3%	31.9%
<b>Total</b>	<b>342</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>342</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>% \$(000s)</b>
Low	6	3.2%	1.8%	3.3%	4.1%					
Moderate	30	16.2%	17.0%	20.3%	19.8%					
Middle	104	56.2%	58.7%	45.3%	47.1%					
Upper	45	24.3%	22.6%	29.6%	28.7%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	1.4%	0.3%					
<b>Total</b>	<b>185</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	81	43.8%	30.0%	43.8%	36.0%					
<b>By Loan Size</b>										
\$100,000 or less	78	42.2%	9.0%	88.3%	25.8%					
\$100,001-\$250,000	48	25.9%	20.3%	5.9%	19.0%					
\$250,001-\$1 Million	59	31.9%	70.7%	5.8%	55.2%					
<b>Total</b>	<b>185</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 42540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.7%	0.4%	29	14.3%	7.7%	9.1%	4.5%
Moderate	39	19.2%	13.3%	12.2%	7.4%	59	29.1%	21.6%	22.4%	15.6%
Middle	114	56.2%	55.5%	57.4%	55.0%	52	25.6%	25.4%	22.6%	20.9%
Upper	50	24.6%	31.2%	29.7%	37.2%	52	25.6%	40.2%	35.8%	50.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	5.4%	5.0%	10.1%	8.3%
<i>Total</i>	<i>203</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>203</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.6%	0.3%	7	4.2%	2.3%	6.1%	2.1%
Moderate	13	7.7%	5.8%	9.8%	17.8%	19	11.3%	8.5%	14.3%	6.0%
Middle	107	63.7%	59.8%	59.1%	58.3%	36	21.4%	15.0%	23.6%	11.9%
Upper	48	28.6%	34.4%	30.4%	23.6%	80	47.6%	62.4%	43.6%	33.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	26	15.5%	11.8%	12.5%	46.9%
<i>Total</i>	<i>168</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>168</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	1	1.7%	0.6%	0.6%	0.6%	15	25.0%	8.2%	11.9%	5.0%
Moderate	9	15.0%	5.5%	11.7%	8.8%	17	28.3%	13.1%	20.4%	12.6%
Middle	37	61.7%	29.0%	62.1%	54.7%	13	21.7%	9.5%	25.6%	20.8%
Upper	13	21.7%	64.9%	25.5%	35.9%	9	15.0%	8.2%	38.6%	55.1%
Unknown	0	0.0%	0.0%	0.1%	0.0%	6	10.0%	61.1%	3.5%	6.5%
<i>Total</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	1	33.3%	16.8%	14.1%	20.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	23.5%	3.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	66.7%	83.2%	47.1%	68.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	15.3%	7.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	2	0.5%	5.3%	0.8%	1.5%	51	11.8%	3.6%	7.7%	2.7%
Moderate	61	14.1%	6.6%	10.9%	14.0%	95	21.9%	10.5%	17.6%	8.3%
Middle	260	59.9%	65.2%	58.9%	57.9%	101	23.3%	13.9%	23.4%	13.8%
Upper	111	25.6%	22.9%	29.5%	26.5%	141	32.5%	34.3%	40.2%	36.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	46	10.6%	37.8%	11.1%	38.7%
<i>Total</i>	<i>434</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>434</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)			
Low	4	2.7%	6.5%	4.3%	5.7%					
Moderate	17	11.6%	10.7%	12.7%	12.4%					
Middle	92	63.0%	63.3%	56.2%	57.1%					
Upper	32	21.9%	19.1%	23.8%	23.7%					
Unknown	1	0.7%	0.5%	0.1%	0.3%					
Tract Unknown	0	0.0%	0.0%	2.8%	0.8%					
<i>Total</i>	<i>146</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
<b>By Revenue</b>										
\$1 Million or Less	82	56.2%	38.7%	47.9%	40.6%					
<b>By Loan Size</b>										
\$100,000 or less	91	62.3%	21.9%	88.3%	30.7%					
\$100,001-\$250,000	32	21.9%	23.6%	6.3%	19.6%					
\$250,001-\$1 Million	23	15.8%	54.6%	5.4%	49.7%					
<i>Total</i>	<i>146</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: PA Non-MSA Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate %	Bank %	Aggregate %	#	Bank %	Aggregate %	Bank %	Aggregate %
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	10	9.5%	4.0%	5.9%	2.8%
Moderate	15	14.3%	7.5%	8.5%	4.5%	22	21.0%	16.0%	22.7%	15.9%
Middle	74	70.5%	74.5%	77.6%	75.9%	28	26.7%	25.1%	25.0%	22.6%
Upper	16	15.2%	18.0%	13.9%	19.6%	35	33.3%	45.6%	37.3%	51.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	9.5%	9.3%	9.1%	7.5%
<b>Total</b>	<b>105</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>105</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	1.6%	0.7%	4.7%	1.7%
Moderate	4	3.1%	1.6%	4.8%	6.7%	10	7.9%	5.9%	14.9%	6.3%
Middle	94	74.0%	70.9%	78.9%	79.8%	32	25.2%	22.2%	22.6%	11.5%
Upper	29	22.8%	27.4%	16.3%	12.1%	66	52.0%	57.6%	44.7%	32.5%
Unknown	0	0.0%	0.0%	0.0%	1.4%	17	13.4%	13.6%	13.0%	48.1%
<b>Total</b>	<b>127</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>127</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.1%	0.2%	20	19.8%	7.2%	8.2%	3.4%
Moderate	14	13.9%	6.5%	8.3%	4.3%	24	23.8%	18.5%	18.9%	10.2%
Middle	72	71.3%	86.8%	80.9%	84.9%	29	28.7%	31.6%	24.4%	19.8%
Upper	15	14.9%	6.7%	10.8%	10.7%	26	25.7%	20.1%	45.5%	61.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.0%	22.6%	3.0%	4.7%
<b>Total</b>	<b>101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	53.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	67.5%	42.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	7.5%	4.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	32	9.6%	2.2%	5.6%	2.1%
Moderate	33	9.9%	4.1%	6.6%	6.5%	56	16.7%	10.2%	18.2%	9.2%
Middle	242	72.2%	73.2%	78.6%	78.4%	89	26.6%	23.5%	23.6%	14.9%
Upper	60	17.9%	22.8%	14.7%	14.2%	127	37.9%	51.0%	41.9%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.9%	31	9.3%	13.1%	10.7%	35.0%
<b>Total</b>	<b>335</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>335</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate %	Bank %	Aggregate %					
Low	0	0.0%	0.0%	0.0%	0.0%					
Moderate	31	14.4%	12.8%	10.2%	10.3%					
Middle	128	59.5%	66.7%	72.1%	73.8%					
Upper	56	26.0%	20.5%	12.5%	14.5%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	5.0%	1.4%					
<b>Total</b>	<b>215</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	120	55.8%	33.4%	42.5%	41.2%					
<b>By Loan Size</b>										
\$100,000 or less	126	58.6%	14.7%	91.1%	29.5%					
\$100,001-\$250,000	56	26.0%	28.3%	4.6%	18.3%					
\$250,001-\$1 Million	33	15.3%	57.0%	4.2%	52.2%					
<b>Total</b>	<b>215</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 11020

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.3%	0.2%	3	6.1%	2.2%	10.0%	5.6%
Moderate	3	6.1%	2.5%	8.2%	4.4%	11	22.4%	13.8%	22.4%	16.3%
Middle	34	69.4%	63.3%	75.1%	74.1%	12	24.5%	18.3%	23.9%	23.4%
Upper	12	24.5%	34.2%	16.5%	21.3%	9	18.4%	26.6%	31.7%	43.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	28.6%	39.0%	12.0%	11.1%
<b>Total</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	4	7.3%	3.1%	7.0%	1.4%
Moderate	1	1.8%	0.5%	5.4%	1.2%	11	20.0%	11.8%	15.3%	4.2%
Middle	40	72.7%	67.1%	79.3%	89.1%	7	12.7%	8.1%	22.7%	7.4%
Upper	14	25.5%	32.4%	15.3%	9.6%	26	47.3%	70.3%	41.9%	20.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	12.7%	6.8%	13.1%	66.4%
<b>Total</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.2%	0.1%	14	25.9%	5.4%	14.4%	5.0%
Moderate	2	3.7%	0.9%	6.9%	4.8%	15	27.8%	6.2%	20.8%	14.6%
Middle	47	87.0%	58.7%	80.2%	76.1%	10	18.5%	6.0%	22.0%	19.0%
Upper	5	9.3%	40.4%	12.7%	19.0%	14	25.9%	70.4%	39.2%	56.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.9%	12.0%	3.6%	5.2%
<b>Total</b>	<b>54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	19.0%	47.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	33.3%	11.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	47.6%	41.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.2%	0.6%	21	13.1%	2.8%	9.1%	2.5%
Moderate	8	5.0%	3.0%	6.7%	2.2%	37	23.1%	12.1%	18.5%	7.1%
Middle	121	75.6%	63.9%	77.8%	84.8%	29	18.1%	12.1%	22.9%	11.2%
Upper	31	19.4%	33.1%	15.2%	12.4%	49	30.6%	51.0%	37.8%	26.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	15.0%	22.0%	11.8%	52.6%
<b>Total</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	9	5.5%	5.5%		3.1%	3.1%				
Moderate	21	12.7%	6.6%		10.4%	5.2%				
Middle	92	55.8%	55.9%		65.4%	71.1%				
Upper	43	26.1%	32.0%		16.6%	19.5%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		4.5%	0.6%				
<b>Total</b>	<b>165</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	91	55.2%	48.9%		40.1%	44.4%				
<b>By Loan Size</b>										
\$100,000 or less	90	54.5%	15.4%		82.9%	19.7%				
\$100,001-\$250,000	46	27.9%	28.2%		9.0%	22.7%				
\$250,001-\$1 Million	29	17.6%	56.4%		8.1%	57.5%				
<b>Total</b>	<b>165</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases



**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 39740

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	1	2.0%	0.4%	3.7%	1.3%	2	4.1%	1.0%	9.2%	4.7%
Moderate	1	2.0%	1.1%	4.2%	2.5%	14	28.6%	21.1%	27.8%	21.9%
Middle	36	73.5%	64.0%	61.7%	58.1%	12	24.5%	22.8%	24.1%	24.6%
Upper	11	22.4%	34.4%	30.4%	38.2%	7	14.3%	22.2%	29.6%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	28.6%	32.8%	9.3%	8.5%
<b>Total</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.9%	0.7%	3	3.0%	1.5%	6.4%	2.8%
Moderate	1	1.0%	0.2%	2.7%	1.4%	10	10.0%	9.1%	15.8%	9.0%
Middle	64	64.0%	59.9%	60.3%	63.8%	17	17.0%	14.7%	23.5%	16.6%
Upper	35	35.0%	39.8%	35.1%	34.1%	31	31.0%	36.7%	40.9%	38.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	39	39.0%	38.0%	13.5%	33.3%
<b>Total</b>	<b>100</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	5	27.8%	42.1%	10.5%	2.4%	6	33.3%	18.3%	12.7%	3.4%
Moderate	0	0.0%	0.0%	5.8%	5.8%	5	27.8%	13.9%	22.1%	14.4%
Middle	10	55.6%	36.1%	59.8%	60.1%	4	22.2%	19.3%	25.0%	24.3%
Upper	3	16.7%	21.8%	23.8%	31.8%	2	11.1%	13.9%	38.4%	55.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	34.7%	1.9%	2.4%
<b>Total</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	16.2%	18.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	10.8%	2.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	51.4%	49.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	100.0%	100.0%	21.6%	29.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	6	3.6%	0.5%	3.1%	1.4%	11	6.5%	1.4%	7.8%	3.4%
Moderate	2	1.2%	0.5%	3.5%	1.9%	29	17.2%	12.2%	20.6%	13.3%
Middle	110	65.1%	58.5%	60.7%	61.4%	33	19.5%	16.5%	23.7%	19.1%
Upper	51	30.2%	40.5%	32.6%	35.3%	40	23.7%	30.9%	36.4%	38.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	56	33.1%	38.9%	11.5%	26.0%
<b>Total</b>	<b>169</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>169</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank		Aggregate					Aggregate	
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	8	6.2%	5.4%	6.0%	7.9%					
Moderate	6	4.6%	2.9%	7.6%	8.7%					
Middle	94	72.3%	64.4%	55.4%	52.9%					
Upper	22	16.9%	27.3%	28.3%	29.8%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.8%	0.6%					
<b>Total</b>	<b>130</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	71	54.6%	35.2%	43.5%	33.0%					
<b>By Loan Size</b>										
\$100,000 or less	77	59.2%	17.6%	87.8%	24.3%					
\$100,001-\$250,000	33	25.4%	31.4%	5.9%	18.2%					
\$250,001-\$1 Million	20	15.4%	51.0%	6.3%	57.5%					
<b>Total</b>	<b>130</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 44300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.2%	0.3%	0	0.0%	0.0%	5.5%	3.0%
Moderate	4	10.8%	6.8%	10.1%	6.8%	3	8.1%	5.9%	18.3%	12.9%
Middle	27	73.0%	76.0%	54.9%	51.6%	10	27.0%	20.7%	23.8%	21.6%
Upper	6	16.2%	17.2%	34.8%	41.4%	19	51.4%	58.4%	43.1%	53.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	13.5%	15.0%	9.3%	9.4%
<b>Total</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	5.0%	2.1%	5.4%	2.8%
Moderate	6	15.0%	10.6%	9.6%	6.8%	8	20.0%	14.1%	14.6%	9.0%
Middle	20	50.0%	44.4%	54.0%	49.6%	9	22.5%	19.5%	21.2%	16.3%
Upper	14	35.0%	45.0%	36.4%	43.6%	16	40.0%	48.8%	47.8%	53.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	12.5%	15.5%	11.0%	18.7%
<b>Total</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.3%	0.1%	6	50.0%	48.5%	11.7%	4.9%
Moderate	1	8.3%	10.3%	14.4%	9.0%	1	8.3%	10.3%	22.6%	13.1%
Middle	9	75.0%	79.4%	62.5%	59.0%	3	25.0%	20.6%	26.6%	24.2%
Upper	2	16.7%	10.3%	22.8%	32.0%	2	16.7%	20.6%	35.3%	49.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	8.8%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	40.0%	1.4%	30.0%	16.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	60.0%	98.6%	60.0%	79.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	10.0%	4.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.1%	0.1%	8	8.5%	0.4%	5.9%	2.6%
Moderate	13	13.8%	3.5%	10.2%	7.8%	12	12.8%	2.9%	16.5%	9.6%
Middle	59	62.8%	87.4%	55.0%	53.5%	22	23.4%	5.9%	22.5%	16.8%
Upper	22	23.4%	9.0%	34.6%	38.6%	37	39.4%	15.8%	44.9%	47.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	16.0%	74.9%	10.2%	23.0%
<b>Total</b>	<b>94</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>94</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	3	5.5%	1.3%	5.5%	5.7%					
Moderate	9	16.4%	9.7%	12.1%	9.4%					
Middle	21	38.2%	28.3%	46.0%	44.9%					
Upper	20	36.4%	38.5%	32.4%	36.0%					
Unknown	2	3.6%	22.1%	0.8%	3.0%					
Tract Unknown	0	0.0%	0.0%	3.1%	0.9%					
<b>Total</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	30	54.5%	28.5%	49.1%	46.3%					
<b>By Loan Size</b>										
\$100,000 or less	33	60.0%	18.8%	89.0%	29.3%					
\$100,001-\$250,000	15	27.3%	29.3%	5.5%	18.0%					
\$250,001-\$1 Million	7	12.7%	51.9%	5.5%	52.7%					
<b>Total</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 29540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	3	5.6%	2.3%	2.6%	1.4%	5	9.3%	5.4%	7.0%	4.0%
Moderate	7	13.0%	6.0%	7.3%	4.3%	12	22.2%	16.9%	26.2%	20.8%
Middle	38	70.4%	74.2%	74.8%	74.9%	13	24.1%	23.2%	26.1%	25.4%
Upper	6	11.1%	17.5%	15.4%	19.3%	10	18.5%	23.0%	31.3%	40.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	25.9%	31.5%	9.4%	8.8%
<b>Total</b>	<b>54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	4	4.9%	4.6%	1.6%	0.8%	5	6.2%	2.9%	5.9%	3.1%
Moderate	5	6.2%	3.6%	5.0%	2.8%	9	11.1%	6.6%	17.0%	11.2%
Middle	60	74.1%	73.5%	77.5%	79.7%	9	11.1%	8.1%	25.0%	19.5%
Upper	12	14.8%	18.3%	15.8%	16.7%	20	24.7%	33.7%	37.9%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	38	46.9%	48.7%	14.2%	26.3%
<b>Total</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.5%	0.6%	1	7.7%	0.7%	8.5%	3.7%
Moderate	1	7.7%	1.5%	5.7%	3.1%	3	23.1%	6.9%	19.1%	12.8%
Middle	11	84.6%	93.1%	77.5%	79.6%	3	23.1%	72.0%	25.9%	22.3%
Upper	1	7.7%	5.5%	15.3%	16.6%	5	38.5%	14.9%	43.9%	56.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	7.7%	5.5%	2.7%	4.3%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	9.9%	1.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	8.3%	31.0%	13.6%	12.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	11	91.7%	69.0%	70.4%	84.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	6.2%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	7	4.4%	2.2%	2.1%	1.1%	11	6.9%	2.3%	6.4%	3.3%
Moderate	14	8.8%	15.3%	6.0%	3.9%	24	15.0%	6.2%	20.6%	14.3%
Middle	120	75.0%	71.9%	76.4%	78.1%	25	15.6%	8.6%	25.3%	20.8%
Upper	19	11.9%	10.6%	15.6%	16.9%	35	21.9%	17.5%	35.5%	38.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	65	40.6%	65.5%	12.1%	22.9%
<b>Total</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Low	6	5.7%	2.9%	4.2%	5.7%	6	5.7%	2.9%	4.2%	5.7%
Moderate	4	3.8%	2.9%	4.1%	3.8%	4	3.8%	2.9%	4.1%	3.8%
Middle	85	80.2%	85.4%	76.3%	75.0%	85	80.2%	85.4%	76.3%	75.0%
Upper	11	10.4%	8.8%	12.8%	14.9%	11	10.4%	8.8%	12.8%	14.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.5%	0	0.0%	0.0%	0.0%	0.5%
<b>Total</b>	<b>106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	59	55.7%	27.2%	45.9%	39.1%	59	55.7%	27.2%	45.9%	39.1%
<b>By Loan Size</b>										
\$100,000 or less	62	58.5%	14.0%	87.6%	23.7%	62	58.5%	14.0%	87.6%	23.7%
\$100,001-\$250,000	18	17.0%	15.1%	5.9%	17.8%	18	17.0%	15.1%	5.9%	17.8%
\$250,001-\$1 Million	26	24.5%	70.9%	6.5%	58.5%	26	24.5%	70.9%	6.5%	58.5%
<b>Total</b>	<b>106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 48700

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	1.3%	0.5%	0	0.0%	0.0%	3.6%	1.8%
Moderate	0	0.0%	0.0%	5.1%	2.7%	6	21.4%	8.9%	18.1%	13.1%
Middle	23	82.1%	80.1%	86.4%	85.9%	4	14.3%	9.0%	25.2%	22.1%
Upper	5	17.9%	19.9%	7.2%	10.8%	10	35.7%	28.6%	42.5%	53.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	28.6%	53.5%	10.6%	9.9%
<b>Total</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.8%	2.8%	0	0.0%	0.0%	3.8%	1.9%
Moderate	1	3.8%	1.4%	2.8%	1.8%	1	3.8%	1.7%	13.3%	8.7%
Middle	19	73.1%	57.1%	86.7%	82.2%	4	15.4%	9.1%	24.4%	20.0%
Upper	6	23.1%	41.5%	9.7%	13.2%	11	42.3%	62.4%	46.2%	54.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	38.5%	26.8%	12.3%	15.4%
<b>Total</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.7%	0.5%	4	25.0%	11.0%	7.2%	3.5%
Moderate	1	6.3%	2.1%	4.8%	3.7%	7	43.8%	69.7%	16.8%	11.6%
Middle	14	87.5%	93.1%	88.2%	87.1%	3	18.8%	12.4%	25.2%	19.8%
Upper	1	6.3%	4.8%	6.3%	8.6%	2	12.5%	6.9%	44.2%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.5%	9.2%
<b>Total</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	20.7%	30.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	17.2%	8.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	62.1%	61.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	1.1%	2.7%	4	5.7%	0.2%	4.1%	1.9%
Moderate	2	2.9%	0.6%	4.0%	2.5%	14	20.0%	6.8%	15.4%	10.4%
Middle	56	80.0%	70.8%	86.6%	83.3%	11	15.7%	9.1%	24.6%	20.2%
Upper	12	17.1%	28.6%	8.3%	11.5%	23	32.9%	42.2%	44.2%	51.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	25.7%	41.8%	11.7%	15.7%
<b>Total</b>	<b>70</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>70</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		<b>Bank</b>			<b>Aggregate</b>					
	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>% \$(000s)</b>
Low	3	4.9%		1.2%		2.1%		0.7%		
Moderate	2	3.3%		1.4%		4.6%		6.1%		
Middle	47	77.0%		88.7%		83.1%		85.7%		
Upper	9	14.8%		8.7%		9.0%		7.2%		
Unknown	0	0.0%		0.0%		0.0%		0.0%		
Tract Unknown	0	0.0%		0.0%		1.3%		0.3%		
<b>Total</b>	<b>61</b>	<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		
<b>By Revenue</b>										
\$1 Million or Less	28	45.9%		28.5%		38.7%		37.1%		
<b>By Loan Size</b>										
\$100,000 or less	21	34.4%		4.9%		89.0%		24.2%		
\$100,001-\$250,000	16	26.2%		14.1%		5.5%		18.0%		
\$250,001-\$1 Million	24	39.3%		80.9%		5.5%		57.8%		
<b>Total</b>	<b>61</b>	<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 10900

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	7	8.2%	6.8%	4.0%	2.3%	2	2.4%	1.8%	9.7%	5.2%
Moderate	14	16.5%	13.3%	16.5%	10.6%	3	3.5%	2.0%	23.7%	18.0%
Middle	42	49.4%	47.0%	45.2%	41.4%	6	7.1%	7.8%	21.7%	21.3%
Upper	22	25.9%	32.9%	34.4%	45.8%	4	4.7%	7.3%	32.5%	43.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	70	82.4%	81.1%	12.4%	12.6%
<b>Total</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	1	1.3%	0.9%	2.9%	2.3%	1	1.3%	0.6%	6.6%	2.9%
Moderate	18	23.7%	18.6%	13.9%	13.8%	2	2.6%	1.9%	16.4%	9.0%
Middle	34	44.7%	41.5%	46.4%	40.2%	4	5.3%	3.0%	21.7%	14.6%
Upper	23	30.3%	39.1%	36.9%	43.7%	10	13.2%	14.7%	41.1%	38.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	59	77.6%	79.8%	14.1%	35.2%
<b>Total</b>	<b>76</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>76</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	3.1%	1.2%	2	40.0%	33.3%	9.6%	4.6%
Moderate	3	60.0%	60.0%	16.8%	12.8%	0	0.0%	0.0%	21.7%	15.2%
Middle	2	40.0%	40.0%	51.4%	48.7%	2	40.0%	33.3%	26.6%	22.3%
Upper	0	0.0%	0.0%	28.7%	37.3%	1	20.0%	33.3%	39.7%	53.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.4%	4.6%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	18.0%	16.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	40.0%	49.9%	39.0%	52.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	20.0%	0.3%	34.0%	10.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	40.0%	49.8%	9.0%	20.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	8	4.7%	1.2%	3.4%	2.8%	5	2.9%	0.4%	7.9%	3.6%
Moderate	37	21.6%	39.3%	15.1%	14.1%	5	2.9%	0.6%	19.4%	11.8%
Middle	79	46.2%	14.0%	46.2%	39.7%	12	7.0%	1.7%	21.9%	16.4%
Upper	47	27.5%	45.5%	35.3%	43.4%	15	8.8%	3.4%	37.7%	38.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	134	78.4%	93.9%	13.1%	29.3%
<b>Total</b>	<b>171</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>171</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)					
Low	4	4.8%	4.9%	5.8%	5.7%					
Moderate	12	14.3%	11.7%	17.3%	16.2%					
Middle	26	31.0%	28.7%	42.4%	42.9%					
Upper	42	50.0%	54.7%	32.6%	34.6%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	1.8%	0.6%					
<b>Total</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	33	39.3%	36.6%	49.6%	39.8%					
<b>By Loan Size</b>										
\$100,000 or less	35	41.7%	10.4%	90.5%	32.0%					
\$100,001-\$250,000	15	17.9%	11.4%	4.6%	16.7%					
\$250,001-\$1 Million	34	40.5%	78.2%	4.8%	51.3%					
<b>Total</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 30140

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	11.1%	5.5%	8.0%	4.2%
Moderate	2	11.1%	9.1%	6.6%	3.5%	3	16.7%	14.8%	22.4%	17.2%
Middle	13	72.2%	71.1%	59.2%	55.0%	3	16.7%	8.6%	26.3%	24.9%
Upper	3	16.7%	19.7%	34.2%	41.4%	8	44.4%	62.2%	34.4%	43.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	11.1%	9.0%	8.9%	9.9%
<b>Total</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.4%	3.5%
Moderate	5	15.6%	10.6%	5.4%	2.8%	7	21.9%	14.6%	16.9%	12.3%
Middle	18	56.3%	58.4%	62.9%	57.2%	7	21.9%	19.9%	24.9%	21.7%
Upper	9	28.1%	31.0%	31.7%	40.0%	6	18.8%	30.3%	37.7%	43.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	37.5%	35.2%	14.2%	18.9%
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	37.5%	62.5%	13.4%	8.2%
Moderate	0	0.0%	0.0%	8.2%	12.0%	0	0.0%	0.0%	16.4%	12.8%
Middle	3	37.5%	22.6%	65.4%	64.2%	2	25.0%	12.5%	27.5%	26.5%
Upper	5	62.5%	77.4%	26.4%	23.7%	3	37.5%	25.0%	39.4%	42.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.3%	10.3%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	31.8%	29.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	54.5%	9.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.6%	60.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	8.6%	3.2%	7.4%	3.7%
Moderate	7	12.1%	9.9%	6.1%	4.8%	10	17.2%	14.4%	18.8%	13.6%
Middle	34	58.6%	62.0%	61.6%	53.7%	12	20.7%	15.9%	25.4%	21.8%
Upper	17	29.3%	28.2%	32.2%	41.5%	17	29.3%	41.0%	36.4%	41.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	24.1%	25.5%	12.0%	19.7%
<b>Total</b>	<b>58</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>58</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0		0.0%		0.0%		0.0%		0.0%	0.0%
Moderate	3		12.5%		9.5%		4.7%		6.0%	6.0%
Middle	15		62.5%		51.5%		66.0%		61.6%	61.6%
Upper	6		25.0%		39.0%		25.3%		31.6%	31.6%
Unknown	0		0.0%		0.0%		0.0%		0.0%	0.0%
Tract Unknown	0		0.0%		0.0%		4.0%		0.7%	0.7%
<b>Total</b>	<b>24</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	8		33.3%		24.6%		45.6%		38.6%	38.6%
<b>By Loan Size</b>										
\$100,000 or less	6		25.0%		3.2%		91.2%		27.1%	27.1%
\$100,001-\$250,000	6		25.0%		16.4%		4.1%		17.1%	17.1%
\$250,001-\$1 Million	12		50.0%		80.4%		4.6%		55.8%	55.8%
<b>Total</b>	<b>24</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: PA Non-MSA Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.5%	1.2%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	3.6%	2.0%	12.6%	8.5%
Middle	12	42.9%	41.3%	49.9%	47.2%	0	0.0%	0.0%	25.3%	23.8%
Upper	16	57.1%	58.7%	50.1%	52.8%	6	21.4%	24.1%	47.2%	52.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	75.0%	73.9%	12.4%	13.7%
<i>Total</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.1%	1.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	10.5%	7.6%	8.4%	3.2%
Middle	11	57.9%	59.4%	48.7%	60.8%	1	5.3%	3.8%	17.5%	7.8%
Upper	8	42.1%	40.6%	51.3%	39.2%	2	10.5%	6.8%	54.8%	30.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	73.7%	81.8%	15.3%	57.3%
<i>Total</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.0%	3.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.8%	8.4%
Middle	1	33.3%	11.4%	39.7%	43.8%	1	33.3%	11.4%	21.8%	18.9%
Upper	2	66.7%	88.6%	60.3%	56.2%	2	66.7%	88.6%	55.1%	63.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	5.6%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	66.7%	83.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	17.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.7%	1.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	6.0%	4.2%	10.1%	4.5%
Middle	24	48.0%	48.3%	48.7%	57.3%	2	4.0%	1.5%	20.5%	11.7%
Upper	26	52.0%	51.7%	51.3%	42.7%	10	20.0%	17.6%	52.0%	36.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	35	70.0%	76.7%	13.6%	46.2%
<i>Total</i>	<i>50</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>50</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank		Aggregate				Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	%	%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Middle	13	76.5%	68.8%	49.3%	57.8%	49.3%	57.8%	57.8%	57.8%	57.8%
Upper	4	23.5%	31.2%	40.3%	39.0%	40.3%	39.0%	39.0%	39.0%	39.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	10.4%	3.1%	3.1%	3.1%	3.1%
<i>Total</i>	<i>17</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>By Revenue</b>										
\$1 Million or Less	7	41.2%	13.6%	51.7%	45.6%	51.7%	45.6%	45.6%	45.6%	45.6%
<b>By Loan Size</b>										
\$100,000 or less	8	47.1%	13.2%	94.0%	42.5%	94.0%	42.5%	42.5%	42.5%	42.5%
\$100,001-\$250,000	5	29.4%	30.9%	3.3%	16.8%	3.3%	16.8%	16.8%	16.8%	16.8%
\$250,001-\$1 Million	4	23.5%	55.8%	2.7%	40.7%	2.7%	40.7%	40.7%	40.7%	40.7%
<i>Total</i>	<i>17</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: PA Non-MSA Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	2.0%
Moderate	7	17.1%	11.1%	2.6%	2.1%	9	22.0%	9.6%	21.1%	15.2%
Middle	25	61.0%	62.3%	47.6%	43.3%	6	14.6%	12.5%	24.2%	22.8%
Upper	9	22.0%	26.6%	49.8%	54.6%	21	51.2%	64.1%	36.6%	45.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	12.2%	13.8%	14.2%	14.2%
<b>Total</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.9%	1.8%
Moderate	0	0.0%	0.0%	2.6%	2.0%	0	0.0%	0.0%	13.1%	7.1%
Middle	7	53.8%	56.0%	46.7%	45.8%	2	15.4%	11.6%	21.0%	13.8%
Upper	6	46.2%	44.0%	50.7%	52.3%	8	61.5%	72.9%	45.4%	40.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	23.1%	15.5%	16.6%	36.7%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	9.3%	3.8%
Moderate	0	0.0%	0.0%	4.0%	3.0%	0	0.0%	0.0%	16.1%	8.6%
Middle	1	50.0%	71.4%	59.8%	56.1%	0	0.0%	0.0%	26.1%	20.0%
Upper	1	50.0%	28.6%	36.2%	40.9%	0	0.0%	0.0%	45.3%	61.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.2%	6.1%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	4.2%	0.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	79.2%	92.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	7.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	3.6%	0.1%	4.2%	1.9%
Moderate	7	12.5%	8.5%	2.7%	2.0%	9	16.1%	7.4%	16.1%	9.7%
Middle	33	58.9%	60.8%	47.9%	45.6%	8	14.3%	12.3%	22.4%	16.8%
Upper	16	28.6%	30.7%	49.3%	52.4%	29	51.8%	66.1%	42.1%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	14.3%	14.1%	15.1%	29.3%
<b>Total</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0		0.0%		0.0%		0.0%		0.0%	0.0%
Moderate	2		15.4%		17.4%		3.2%		2.4%	2.4%
Middle	9		69.2%		36.3%		51.8%		52.5%	52.5%
Upper	2		15.4%		46.3%		43.1%		44.8%	44.8%
Unknown	0		0.0%		0.0%		0.0%		0.0%	0.0%
Tract Unknown	0		0.0%		0.0%		1.9%		0.3%	0.3%
<b>Total</b>	<b>13</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	4		30.8%		11.2%		45.8%		43.5%	43.5%
<b>By Loan Size</b>										
\$100,000 or less	8		61.5%		20.8%		88.0%		27.8%	27.8%
\$100,001-\$250,000	1		7.7%		5.1%		6.1%		19.4%	19.4%
\$250,001-\$1 Million	4		30.8%		74.1%		5.9%		52.7%	52.7%
<b>Total</b>	<b>13</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases



**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: PA Non-MSA Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	9.1%	3.0%	7.7%	4.2%
Moderate	0	0.0%	0.0%	13.3%	10.0%	1	9.1%	5.4%	23.8%	16.9%
Middle	11	100.0%	100.0%	76.0%	75.5%	2	18.2%	22.4%	25.7%	23.4%
Upper	0	0.0%	0.0%	10.7%	14.5%	3	27.3%	42.2%	36.2%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	36.4%	27.0%	6.5%	5.8%
<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.0%	3.0%	6.0%	1.6%
Moderate	0	0.0%	0.0%	13.4%	19.8%	4	20.0%	16.1%	17.4%	6.1%
Middle	20	100.0%	100.0%	79.3%	74.8%	3	15.0%	10.7%	23.6%	9.7%
Upper	0	0.0%	0.0%	7.3%	5.5%	8	40.0%	54.8%	42.9%	25.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	20.0%	15.5%	10.1%	56.9%
<i>Total</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	7	29.2%	22.5%	11.9%	4.9%
Moderate	3	12.5%	10.9%	17.1%	17.4%	10	41.7%	39.1%	20.2%	11.4%
Middle	21	87.5%	89.1%	78.4%	74.8%	5	20.8%	26.8%	24.8%	19.3%
Upper	0	0.0%	0.0%	4.5%	7.8%	2	8.3%	11.6%	39.1%	60.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.0%	4.4%
<i>Total</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	17.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	75.0%	82.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	9	16.4%	3.7%	7.7%	2.5%
Moderate	3	5.5%	0.4%	14.1%	16.9%	15	27.3%	13.6%	20.0%	9.3%
Middle	52	94.5%	99.6%	78.0%	75.1%	10	18.2%	15.1%	24.4%	13.9%
Upper	0	0.0%	0.0%	7.9%	8.0%	13	23.6%	49.0%	39.7%	34.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	14.5%	18.6%	8.2%	40.1%
<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	16.6%	0.0%	18.1%	0.0%	0.0%
Middle	34	97.1%	99.5%	75.9%	78.0%	75.9%	78.0%	78.0%	78.0%	78.0%
Upper	1	2.9%	0.5%	4.7%	0.0%	4.7%	0.0%	3.5%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	2.8%	0.0%	0.3%	0.0%	0.0%
<i>Total</i>	<i>35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>By Revenue</b>										
\$1 Million or Less	19	54.3%	32.2%	50.1%	40.8%					
<b>By Loan Size</b>										
\$100,000 or less	16	45.7%	7.2%	85.9%	28.9%					
\$100,001-\$250,000	7	20.0%	12.9%	7.7%	19.9%					
\$250,001-\$1 Million	12	34.3%	79.9%	6.4%	51.2%					
<i>Total</i>	<i>35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: DE Non-MSA Group

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	3	3.9%	0.8%	2.9%	1.1%
Moderate	5	6.5%	2.4%	7.2%	5.1%	10	13.0%	4.8%	10.8%	6.1%
Middle	41	53.2%	24.6%	71.3%	63.9%	9	11.7%	6.3%	15.9%	11.4%
Upper	31	40.3%	72.9%	21.5%	31.0%	34	44.2%	49.7%	60.0%	68.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	27.3%	38.4%	10.4%	12.7%
<i>Total</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Refinance</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	4	3.0%	1.4%	3.7%	1.7%
Moderate	10	7.5%	4.6%	6.1%	4.2%	14	10.5%	5.7%	8.6%	4.3%
Middle	92	69.2%	61.6%	66.6%	63.6%	21	15.8%	10.2%	15.4%	9.7%
Upper	31	23.3%	33.8%	27.3%	32.2%	58	43.6%	55.8%	58.5%	58.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	36	27.1%	26.9%	13.8%	25.5%
<i>Total</i>	<i>133</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>133</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	6	10.9%	2.0%	8.2%	1.8%
Moderate	6	10.9%	3.8%	7.1%	5.2%	12	21.8%	6.8%	14.2%	7.8%
Middle	42	76.4%	91.4%	72.8%	55.2%	16	29.1%	13.7%	22.2%	16.9%
Upper	7	12.7%	4.8%	20.1%	39.6%	19	34.5%	29.7%	48.5%	61.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.6%	47.8%	6.9%	12.1%
<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	8.3%	4.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	58.3%	47.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	48.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>HMDA Totals</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	13	4.9%	1.1%	3.5%	1.4%
Moderate	21	7.9%	3.6%	6.6%	4.6%	36	13.6%	5.3%	9.7%	5.1%
Middle	175	66.0%	44.8%	68.8%	63.6%	46	17.4%	8.4%	15.8%	10.5%
Upper	69	26.0%	51.6%	24.6%	31.8%	111	41.9%	52.5%	58.8%	62.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	59	22.3%	32.6%	12.2%	20.2%
<i>Total</i>	<i>265</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>265</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank			Aggregate					
		%	% \$(000s)		% \$(000s)		% \$(000s)			
Low	0	0.0%	0.0%		0.0%		0.0%			
Moderate	23	23.2%	31.2%		11.4%		12.9%			
Middle	61	61.6%	57.5%		63.1%		63.6%			
Upper	15	15.2%	11.4%		21.4%		22.2%			
Unknown	0	0.0%	0.0%		0.0%		0.0%			
Tract Unknown	0	0.0%	0.0%		4.2%		1.2%			
<i>Total</i>	<i>99</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>			
	<b>By Revenue</b>									
\$1 Million or Less	61	61.6%	39.4%		45.7%		41.7%			
	<b>By Loan Size</b>									
\$100,000 or less	54	54.5%	13.5%		93.9%		35.8%			
\$100,001-\$250,000	26	26.3%	23.4%		2.8%		13.6%			
\$250,001-\$1 Million	19	19.2%	63.1%		3.4%		50.6%			
<i>Total</i>	<i>99</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>			

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 20100

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate %	Bank %	Aggregate %	#	Bank %	Aggregate %	Bank %	Aggregate %
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	3	8.8%	6.0%	8.2%	5.0%
Moderate	1	2.9%	3.3%	6.5%	5.2%	5	14.7%	11.8%	28.3%	24.5%
Middle	27	79.4%	73.1%	77.3%	77.6%	4	11.8%	8.8%	25.8%	28.3%
Upper	6	17.6%	23.6%	16.3%	17.2%	7	20.6%	21.2%	19.6%	25.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	44.1%	52.2%	18.1%	17.1%
<b>Total</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	3	5.7%	2.9%	6.0%	3.3%
Moderate	3	5.7%	4.8%	7.5%	5.4%	6	11.3%	8.3%	16.7%	11.5%
Middle	43	81.1%	86.3%	74.2%	77.9%	5	9.4%	5.2%	20.7%	16.9%
Upper	7	13.2%	8.9%	18.3%	16.7%	8	15.1%	12.7%	28.8%	28.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	31	58.5%	71.0%	27.8%	40.2%
<b>Total</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	6	17.6%	5.8%	10.0%	3.8%
Moderate	3	8.8%	4.5%	8.5%	6.5%	10	29.4%	11.1%	25.0%	17.3%
Middle	24	70.6%	85.2%	76.2%	80.6%	7	20.6%	11.3%	22.7%	22.5%
Upper	7	20.6%	10.3%	15.4%	12.9%	11	32.4%	71.8%	36.5%	46.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.8%	9.7%
<b>Total</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	12	9.9%	4.2%	7.0%	4.0%
Moderate	7	5.8%	4.2%	7.1%	5.3%	21	17.4%	9.8%	21.8%	16.6%
Middle	94	77.7%	81.0%	75.6%	78.1%	16	13.2%	6.8%	22.9%	21.3%
Upper	20	16.5%	14.8%	17.4%	16.6%	26	21.5%	17.9%	25.3%	26.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	46	38.0%	61.2%	23.0%	31.4%
<b>Total</b>	<b>121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank %	Aggregate %	Bank %	Aggregate %	#	Bank %	Aggregate %	Bank %	Aggregate %
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	13.8%	13.9%	13.8%	13.9%	4	17.5%	17.5%	27.0%	27.0%
Middle	24	82.8%	85.5%	82.8%	85.5%	16	62.4%	62.4%	58.9%	58.9%
Upper	1	3.4%	0.6%	3.4%	0.6%	1	17.3%	17.3%	13.2%	13.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0	2.8%	2.8%	0.9%	0.9%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>By Revenue</b>									
\$1 Million or Less	17	58.6%	46.2%	58.6%	46.2%	12	39.6%	46.2%	39.6%	40.5%
	<b>By Loan Size</b>									
\$100,000 or less	16	55.2%	17.6%	55.2%	17.6%	16	94.6%	94.6%	39.0%	39.0%
\$100,001-\$250,000	7	24.1%	26.6%	24.1%	26.6%	7	2.6%	2.6%	14.2%	14.2%
\$250,001-\$1 Million	6	20.7%	55.8%	20.7%	55.8%	6	2.8%	2.8%	46.8%	46.8%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 40060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	13	9.2%	5.1%	2.8%	1.3%	1	0.7%	0.2%	8.9%	4.2%
Moderate	34	24.1%	11.8%	17.1%	10.4%	5	3.5%	2.1%	20.7%	14.3%
Middle	25	17.7%	22.2%	29.9%	25.0%	19	13.5%	13.1%	18.8%	17.4%
Upper	69	48.9%	60.8%	50.2%	63.2%	50	35.5%	47.4%	36.7%	50.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	66	46.8%	37.3%	14.9%	13.8%
<b>Total</b>	<b>141</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>141</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	5	6.0%	4.1%	3.4%	5.7%	0	0.0%	0.0%	7.5%	3.6%
Moderate	33	39.8%	31.5%	15.4%	15.3%	0	0.0%	0.0%	16.0%	9.5%
Middle	22	26.5%	23.6%	29.1%	25.6%	1	1.2%	0.9%	19.3%	14.0%
Upper	23	27.7%	40.8%	52.1%	53.4%	9	10.8%	12.6%	39.1%	40.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	73	88.0%	86.4%	18.2%	32.4%
<b>Total</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	4.5%	1.2%	0	0.0%	0.0%	11.2%	3.4%
Moderate	0	0.0%	0.0%	18.5%	9.7%	0	0.0%	0.0%	24.6%	14.3%
Middle	0	0.0%	0.0%	31.0%	22.8%	0	0.0%	0.0%	20.7%	17.5%
Upper	1	100.0%	100.0%	46.0%	66.3%	1	100.0%	100.0%	38.0%	55.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.4%	9.6%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	2	28.6%	33.1%	23.5%	26.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	28.6%	1.0%	23.5%	24.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	32.4%	19.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	42.9%	66.0%	20.6%	29.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	20	8.6%	22.4%	3.3%	5.2%	1	0.4%	0.0%	8.2%	3.6%
Moderate	69	29.7%	7.5%	16.2%	13.9%	5	2.2%	0.5%	18.1%	10.8%
Middle	47	20.3%	8.5%	29.5%	25.0%	20	8.6%	3.4%	19.1%	14.5%
Upper	96	41.4%	61.5%	51.1%	55.9%	60	25.9%	13.4%	38.0%	42.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	146	62.9%	82.6%	16.6%	29.0%
<b>Total</b>	<b>232</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>232</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	2	5.1%	1.5%	7.1%	10.1%					
Moderate	6	15.4%	8.2%	19.1%	21.6%					
Middle	13	33.3%	24.1%	28.6%	29.2%					
Upper	18	46.2%	66.2%	43.8%	38.1%					
Unknown	0	0.0%	0.0%	0.1%	0.2%					
Tract Unknown	0	0.0%	0.0%	1.4%	0.8%					
<b>Total</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	21	53.8%	41.8%	46.1%	30.0%					
<b>By Loan Size</b>										
\$100,000 or less	25	64.1%	19.4%	88.4%	24.1%					
\$100,001-\$250,000	6	15.4%	15.7%	4.8%	15.0%					
\$250,001-\$1 Million	8	20.5%	64.9%	6.8%	61.0%					
<b>Total</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD 48424

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank		Aggregate		#	Bank		Aggregate	
	%	% \$(000s)	%	% \$(000s)	%	%	% \$(000s)	%	% \$(000s)	
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	1.2%	0.8%	0	0.0%	0.0%	4.7%	1.5%
Moderate	3	12.0%	6.8%	12.8%	6.2%	0	0.0%	0.0%	14.6%	6.9%
Middle	13	52.0%	40.3%	36.3%	29.7%	0	0.0%	0.0%	17.9%	11.7%
Upper	9	36.0%	52.9%	49.6%	63.2%	6	24.0%	49.9%	51.6%	64.1%
Unknown	0	0.0%	0.0%	0.1%	0.1%	19	76.0%	50.1%	11.2%	15.7%
<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	1	2.0%	0.5%	1.0%	0.5%	0	0.0%	0.0%	7.9%	3.0%
Moderate	12	23.5%	15.7%	13.0%	11.6%	0	0.0%	0.0%	12.0%	5.1%
Middle	16	31.4%	33.3%	35.3%	30.6%	1	2.0%	1.0%	17.9%	9.6%
Upper	22	43.1%	50.4%	50.6%	57.2%	7	13.7%	23.5%	51.2%	48.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	43	84.3%	75.5%	11.0%	33.6%
<i>Total</i>	<i>51</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>51</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.8%	0.3%	0	0.0%	0.0%	9.4%	1.1%
Moderate	0	0.0%	0.0%	18.5%	4.9%	0	0.0%	0.0%	15.3%	3.5%
Middle	1	100.0%	100.0%	33.3%	17.9%	0	0.0%	0.0%	21.0%	9.0%
Upper	0	0.0%	0.0%	46.4%	77.0%	0	0.0%	0.0%	50.2%	74.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	4.1%	11.8%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	4.7%	14.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	37.2%	41.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	37.2%	26.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	20.9%	18.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	1	1.3%	0.3%	1.1%	0.9%	0	0.0%	0.0%	6.6%	2.3%
Moderate	15	19.5%	12.4%	13.1%	9.9%	0	0.0%	0.0%	13.2%	5.7%
Middle	30	39.0%	36.5%	35.7%	30.0%	1	1.3%	0.6%	18.0%	10.3%
Upper	31	40.3%	50.8%	50.0%	59.2%	13	16.9%	32.7%	51.3%	54.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	63	81.8%	66.7%	11.0%	27.2%
<i>Total</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank		Aggregate			Bank		Aggregate	
		%	% \$(000s)	%	% \$(000s)		%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%		3.5%	0.0%	4.8%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%		16.2%	0.0%	20.8%	0.0%
Middle	2	33.3%	33.3%	52.7%	30.3%		30.3%	30.3%	30.5%	30.5%
Upper	4	66.7%	66.7%	47.3%	49.2%		49.2%	49.2%	43.0%	43.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%		0.2%	0.0%	0.3%	0.3%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%		0.7%	0.0%	0.5%	0.5%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>By Revenue</b>										
\$1 Million or Less	2	33.3%	33.3%	24.3%	24.3%		52.6%	52.6%	35.0%	35.0%
<b>By Loan Size</b>										
\$100,000 or less	0	0.0%	0.0%	0.0%	0.0%		95.2%	95.2%	41.9%	41.9%
\$100,001-\$250,000	2	33.3%	33.3%	18.4%	18.4%		2.3%	2.3%	13.5%	13.5%
\$250,001-\$1 Million	4	66.7%	66.7%	81.6%	81.6%		2.5%	2.5%	44.6%	44.6%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD 14484

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	3	8.3%	8.0%	5.8%	5.2%	0	0.0%	0.0%	3.2%	1.5%
Moderate	4	11.1%	11.7%	14.0%	11.3%	0	0.0%	0.0%	16.6%	10.1%
Middle	14	38.9%	32.0%	35.5%	28.2%	1	2.8%	2.2%	22.0%	17.6%
Upper	15	41.7%	48.3%	44.6%	55.3%	3	8.3%	12.7%	44.9%	55.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	88.9%	85.0%	13.4%	14.9%
<b>Total</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	4	6.8%	5.6%	5.0%	4.4%	1	1.7%	0.6%	4.0%	2.1%
Moderate	12	20.3%	18.8%	11.8%	10.0%	2	3.4%	3.5%	12.8%	8.3%
Middle	33	55.9%	54.1%	34.4%	28.2%	4	6.8%	5.5%	21.8%	17.4%
Upper	10	16.9%	21.4%	48.8%	57.5%	3	5.1%	7.8%	49.6%	58.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	49	83.1%	82.6%	11.9%	13.9%
<b>Total</b>	<b>59</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>59</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	3.9%	4.0%	0	0.0%	0.0%	4.7%	2.0%
Moderate	0	0.0%	0.0%	11.0%	8.8%	1	50.0%	35.5%	14.6%	8.8%
Middle	0	0.0%	0.0%	36.1%	25.6%	0	0.0%	0.0%	23.2%	14.8%
Upper	2	100.0%	100.0%	48.9%	61.5%	0	0.0%	0.0%	48.9%	56.7%
Unknown	0	0.0%	0.0%	0.0%	0.1%	1	50.0%	64.5%	8.6%	17.7%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	22.0%	24.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	31.1%	23.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	19.8%	16.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	27.1%	35.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	7	7.2%	6.3%	5.3%	5.7%	1	1.0%	0.4%	3.7%	1.8%
Moderate	16	16.5%	15.8%	12.6%	11.2%	3	3.1%	3.0%	14.0%	8.5%
Middle	47	48.5%	44.9%	34.8%	27.5%	5	5.2%	4.2%	21.8%	16.5%
Upper	27	27.8%	32.9%	47.3%	55.6%	6	6.2%	9.4%	47.7%	54.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	82	84.5%	83.0%	12.8%	19.1%
<b>Total</b>	<b>97</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>97</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	0	0.0%	0.0%	0.0%	7.0%	9.0%				
Moderate	2	9.1%	9.1%	7.0%	11.2%	10.3%				
Middle	10	45.5%	45.5%	47.6%	31.3%	29.7%				
Upper	10	45.5%	45.5%	45.4%	48.8%	49.8%				
Unknown	0	0.0%	0.0%	0.0%	0.6%	0.8%				
Tract Unknown	0	0.0%	0.0%	0.0%	1.0%	0.5%				
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	0	0.0%	0.0%	0.0%	46.1%	31.9%				
<b>By Loan Size</b>										
\$100,000 or less	0	0.0%	0.0%	0.0%	92.6%	29.6%				
\$100,001-\$250,000	0	0.0%	0.0%	0.0%	3.1%	13.4%				
\$250,001-\$1 Million	22	100.0%	100.0%	100.0%	4.3%	57.0%				
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 14860

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	2	2.4%	1.1%	3.7%	1.6%	2	2.4%	0.8%	7.6%	2.3%
Moderate	19	22.4%	14.7%	14.7%	6.9%	2	2.4%	1.5%	17.2%	8.2%
Middle	47	55.3%	52.7%	40.1%	25.9%	9	10.6%	9.1%	18.2%	11.7%
Upper	17	20.0%	31.5%	41.4%	65.7%	8	9.4%	17.3%	47.1%	67.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	64	75.3%	71.3%	10.0%	10.2%
<i>Total</i>	<i>85</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>85</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	6	9.0%	6.1%	3.0%	1.3%	1	1.5%	0.8%	6.5%	2.5%
Moderate	18	26.9%	18.5%	11.6%	7.3%	2	3.0%	2.4%	13.6%	6.3%
Middle	29	43.3%	37.3%	36.6%	24.7%	1	1.5%	2.6%	18.6%	10.9%
Upper	14	20.9%	38.1%	48.8%	66.7%	11	16.4%	26.0%	51.7%	65.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	52	77.6%	68.3%	9.5%	14.4%
<i>Total</i>	<i>67</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>67</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	2.8%	0.8%	0	0.0%	0.0%	8.1%	2.0%
Moderate	0	0.0%	0.0%	10.7%	4.0%	0	0.0%	0.0%	13.0%	4.9%
Middle	1	33.3%	23.6%	34.3%	16.4%	0	0.0%	0.0%	18.9%	8.2%
Upper	2	66.7%	76.4%	52.2%	78.8%	1	33.3%	23.6%	52.4%	74.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	66.7%	76.4%	7.6%	10.6%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	45.8%	66.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	27.7%	21.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	21.7%	8.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	4.8%	4.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	8	5.2%	3.3%	3.3%	2.4%	3	1.9%	0.8%	6.9%	2.4%
Moderate	37	23.9%	15.8%	12.7%	7.3%	4	2.6%	1.8%	14.8%	6.8%
Middle	77	49.7%	45.0%	37.7%	24.7%	10	6.5%	5.9%	18.4%	10.9%
Upper	33	21.3%	35.9%	46.2%	65.7%	20	12.9%	21.3%	50.0%	65.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	118	76.1%	70.2%	9.8%	14.1%
<i>Total</i>	<i>155</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>155</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank		Aggregate					Aggregate	
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	3		13.0%		7.6%		8.1%		11.3%	
Moderate	5		21.7%		32.4%		15.4%		19.5%	
Middle	11		47.8%		44.6%		32.5%		30.1%	
Upper	4		17.4%		15.5%		42.7%		38.5%	
Unknown	0		0.0%		0.0%		0.0%		0.0%	
Tract Unknown	0		0.0%		0.0%		1.2%		0.6%	
<i>Total</i>	<i>23</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	
<b>By Revenue</b>										
\$1 Million or Less	12		52.2%		32.7%		47.7%		32.9%	
<b>By Loan Size</b>										
\$100,000 or less	8		34.8%		5.7%		93.9%		39.1%	
\$100,001-\$250,000	5		21.7%		13.3%		3.1%		14.9%	
\$250,001-\$1 Million	10		43.5%		81.0%		2.9%		45.9%	
<i>Total</i>	<i>23</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	

Originations and Purchases

**APPENDIX H**  
**AGGREGATE LOAN DISTRIBUTION TABLES 2012**  
**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 37980

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	%	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	%	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	43	7.0%	3.5%	5.1%	2.8%	36	5.9%	3.2%	10.1%	5.1%
Moderate	108	17.6%	11.1%	13.8%	8.5%	76	12.4%	8.7%	21.6%	15.9%
Middle	210	34.3%	29.7%	34.2%	29.8%	66	10.8%	10.3%	21.7%	20.9%
Upper	251	41.0%	55.8%	46.8%	58.9%	116	19.0%	28.2%	33.8%	47.4%
Unknown	0	0.0%	0.0%	0.1%	0.0%	318	52.0%	49.7%	12.8%	10.7%
<b>Total</b>	<b>612</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>612</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	29	2.9%	4.1%	2.5%	1.4%	58	5.9%	2.9%	5.1%	2.5%
Moderate	131	13.2%	8.5%	9.2%	5.7%	90	9.1%	5.5%	13.5%	8.9%
Middle	391	39.5%	32.8%	30.8%	25.8%	101	10.2%	8.7%	20.4%	17.2%
Upper	440	44.4%	54.6%	57.4%	67.0%	268	27.0%	35.1%	45.4%	55.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	474	47.8%	47.7%	15.6%	15.6%
<b>Total</b>	<b>991</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>991</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	9	7.9%	1.3%	8.6%	3.4%	32	28.1%	1.5%	13.9%	4.9%
Moderate	19	16.7%	4.1%	16.3%	9.1%	26	22.8%	5.0%	21.3%	13.6%
Middle	45	39.5%	15.2%	34.0%	28.0%	21	18.4%	4.2%	22.8%	19.6%
Upper	41	36.0%	79.3%	41.0%	59.5%	23	20.2%	10.0%	36.9%	53.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	10.5%	79.4%	5.0%	8.6%
<b>Total</b>	<b>114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	16.8%	10.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	18.2%	4.9%	19.3%	10.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	6	54.5%	74.8%	31.8%	35.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	27.3%	20.2%	32.0%	43.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	81	4.7%	2.3%	3.5%	2.3%	126	7.3%	1.8%	6.9%	3.2%
Moderate	260	15.0%	7.6%	10.9%	6.8%	192	11.1%	4.0%	16.0%	10.5%
Middle	652	37.7%	48.8%	31.9%	27.5%	188	10.9%	5.5%	20.8%	17.4%
Upper	735	42.5%	41.3%	53.7%	63.4%	407	23.6%	19.0%	41.7%	50.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	815	47.2%	69.7%	14.6%	18.5%
<b>Total</b>	<b>1,728</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,728</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$(000s)	%	Aggregate % \$(000s)					
Low	16	3.2%	2.6%	4.8%	5.2%					
Moderate	82	16.4%	13.3%	10.9%	10.6%					
Middle	164	32.8%	36.5%	29.4%	30.5%					
Upper	237	47.4%	47.6%	51.4%	51.2%					
Unknown	1	0.2%	0.1%	0.7%	1.4%					
Tract Unknown	0	0.0%	0.0%	2.8%	0.9%					
<b>Total</b>	<b>500</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	220	44.0%	29.5%	40.1%	32.1%					
<b>By Loan Size</b>										
\$100,000 or less	257	51.4%	11.5%	93.1%	34.5%					
\$100,001-\$250,000	94	18.8%	14.8%	3.2%	15.1%					
\$250,001-\$1 Million	149	29.8%	73.7%	3.6%	50.4%					
<b>Total</b>	<b>500</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases



**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 35620

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	117	11.6%	4.6%	2.6%	2.2%	32	3.2%	0.8%	2.5%	1.0%
Moderate	195	19.4%	19.0%	12.8%	10.4%	122	12.1%	2.9%	11.9%	6.3%
Middle	350	34.8%	39.5%	36.1%	30.4%	128	12.7%	6.6%	21.5%	14.7%
Upper	342	34.0%	36.6%	48.3%	56.6%	233	23.2%	24.7%	54.7%	67.3%
Unknown	2	0.2%	0.3%	0.2%	0.4%	491	48.8%	65.0%	9.4%	10.7%
<b>Total</b>	<b>1,006</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,006</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	10	1.5%	1.4%	1.2%	1.2%	9	1.3%	0.4%	2.9%	1.5%
Moderate	76	11.3%	11.5%	8.0%	6.6%	45	6.7%	2.9%	8.7%	5.0%
Middle	257	38.1%	32.7%	32.4%	27.0%	64	9.5%	5.8%	17.4%	12.1%
Upper	330	48.9%	54.1%	58.3%	64.9%	201	29.8%	28.3%	60.2%	69.7%
Unknown	2	0.3%	0.3%	0.1%	0.3%	356	52.7%	62.6%	10.7%	11.7%
<b>Total</b>	<b>675</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>675</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.4%	1.0%	6	7.1%	0.0%	5.4%	1.2%
Moderate	3	3.5%	0.3%	9.6%	6.3%	11	12.9%	0.1%	13.5%	5.3%
Middle	40	47.1%	28.6%	40.3%	32.0%	14	16.5%	0.2%	21.9%	11.7%
Upper	41	48.2%	70.8%	48.7%	60.5%	29	34.1%	1.6%	53.2%	58.9%
Unknown	1	1.2%	0.2%	0.0%	0.1%	25	29.4%	98.0%	6.0%	22.9%
<b>Total</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	2	2.0%	1.6%	11.7%	10.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	19	19.4%	19.7%	28.1%	21.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	10	10.2%	11.7%	22.6%	21.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	67	68.4%	67.0%	37.5%	46.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.1%	0.1%	98	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>98</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>98</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	129	6.9%	2.1%	1.8%	2.5%	47	2.5%	0.3%	2.8%	1.1%
Moderate	293	15.7%	15.2%	10.1%	9.6%	178	9.5%	1.2%	9.9%	4.9%
Middle	657	35.2%	24.7%	33.8%	27.8%	206	11.1%	2.6%	18.7%	11.8%
Upper	780	41.8%	57.9%	54.1%	59.8%	463	24.8%	10.7%	57.1%	61.1%
Unknown	5	0.3%	0.2%	0.1%	0.3%	970	52.0%	85.3%	11.5%	21.1%
<b>Total</b>	<b>1,864</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,864</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	9	1.7%	1.3%	4.7%	4.7%					
Moderate	59	10.9%	12.0%	13.7%	13.7%					
Middle	165	30.6%	39.6%	30.6%	31.4%					
Upper	296	54.9%	46.2%	47.1%	45.8%					
Unknown	10	1.9%	1.0%	2.0%	3.1%					
Tract Unknown	0	0.0%	0.0%	1.9%	1.2%					
<b>Total</b>	<b>539</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	206	38.2%	24.5%	37.3%	28.6%					
<b>By Loan Size</b>										
\$100,000 or less	240	44.5%	8.9%	95.8%	41.7%					
\$100,001-\$250,000	134	24.9%	18.3%	1.9%	12.4%					
\$250,001-\$1 Million	165	30.6%	72.8%	2.2%	45.9%					
<b>Total</b>	<b>539</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 47900

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	20	4.2%	3.7%	3.8%	2.9%	28	5.9%	3.3%	10.8%	5.3%
Moderate	128	27.1%	24.0%	17.7%	12.7%	53	11.2%	8.6%	20.5%	14.9%
Middle	193	40.8%	35.4%	37.7%	32.1%	68	14.4%	15.7%	23.4%	22.9%
Upper	132	27.9%	36.9%	40.8%	52.3%	91	19.2%	27.2%	33.7%	46.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	233	49.3%	45.2%	11.7%	10.6%
<b>Total</b>	<b>473</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>473</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	44	3.8%	3.0%	2.5%	2.0%	42	3.7%	1.8%	5.5%	2.8%
Moderate	247	21.5%	17.0%	13.1%	9.8%	110	9.6%	6.6%	12.7%	8.7%
Middle	492	42.9%	38.9%	34.6%	29.2%	145	12.6%	11.6%	21.6%	19.0%
Upper	364	31.7%	41.0%	49.8%	59.0%	274	23.9%	32.2%	39.7%	47.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	576	50.2%	47.9%	20.6%	21.9%
<b>Total</b>	<b>1,147</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,147</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	4.5%	2.1%	18	15.7%	0.2%	11.7%	4.1%
Moderate	35	30.4%	3.8%	18.0%	10.2%	29	25.2%	0.4%	21.1%	12.2%
Middle	58	50.4%	3.1%	38.6%	27.1%	28	24.3%	1.1%	25.4%	20.7%
Upper	22	19.1%	93.1%	38.8%	60.5%	27	23.5%	0.8%	38.4%	52.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	11.3%	97.5%	3.4%	10.2%
<b>Total</b>	<b>115</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>115</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	6	30.0%	25.0%	24.2%	15.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	30.0%	33.3%	32.1%	35.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	20.0%	29.9%	18.8%	31.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	20.0%	11.8%	24.9%	18.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	70	4.0%	16.3%	2.9%	2.5%	88	5.0%	0.8%	7.0%	3.4%
Moderate	416	23.7%	27.0%	14.4%	11.2%	192	10.9%	2.5%	14.9%	10.2%
Middle	747	42.6%	31.4%	35.5%	30.0%	241	13.7%	4.5%	22.2%	19.6%
Upper	522	29.7%	25.2%	47.2%	56.3%	392	22.3%	10.7%	38.0%	46.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	842	48.0%	81.5%	17.9%	20.5%
<b>Total</b>	<b>1,755</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,755</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank			Aggregate					
		%	% \$(000s)		%	% \$(000s)				
Low	24	4.1%	3.2%		3.4%	3.7%				
Moderate	152	26.1%	23.7%		18.0%	17.6%				
Middle	207	35.6%	37.3%		33.9%	36.1%				
Upper	199	34.2%	35.9%		42.8%	41.8%				
Unknown	0	0.0%	0.0%		0.1%	0.1%				
Tract Unknown	0	0.0%	0.0%		1.7%	0.7%				
<b>Total</b>	<b>582</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	310	53.3%	31.4%		44.6%	31.7%				
<b>By Loan Size</b>										
\$100,000 or less	340	58.4%	16.8%		93.5%	31.8%				
\$100,001-\$250,000	116	19.9%	21.1%		2.9%	14.5%				
\$250,001-\$1 Million	126	21.6%	62.1%		3.6%	53.7%				
<b>Total</b>	<b>582</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 19060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	11.1%	5.8%	9.8%	5.7%
Moderate	6	33.3%	29.7%	18.8%	18.5%	4	22.2%	17.1%	24.5%	19.9%
Middle	10	55.6%	43.2%	63.4%	57.9%	3	16.7%	13.6%	29.2%	30.0%
Upper	2	11.1%	27.1%	17.7%	23.5%	7	38.9%	45.1%	24.2%	32.7%
Unknown	0	0.0%	0.0%	0.1%	0.1%	2	11.1%	18.5%	12.4%	11.7%
<i>Total</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	1.7%	0.4%	4.1%	1.9%
Moderate	12	20.0%	16.0%	13.5%	12.5%	5	8.3%	6.4%	14.6%	9.3%
Middle	32	53.3%	49.7%	63.9%	60.5%	15	25.0%	16.3%	22.2%	18.7%
Upper	16	26.7%	34.3%	22.5%	26.9%	28	46.7%	55.2%	44.6%	52.2%
Unknown	0	0.0%	0.0%	0.1%	0.1%	11	18.3%	21.7%	14.6%	17.8%
<i>Total</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	7	19.4%	31.5%	9.8%	3.4%
Moderate	14	38.9%	30.0%	26.4%	23.8%	11	30.6%	29.2%	16.9%	9.5%
Middle	20	55.6%	65.9%	61.4%	60.4%	11	30.6%	25.1%	26.4%	18.0%
Upper	2	5.6%	4.1%	12.2%	15.8%	7	19.4%	14.2%	44.5%	66.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.4%	2.9%
<i>Total</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.0%	26.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	80.0%	73.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	10	8.8%	2.4%	6.4%	3.2%
Moderate	32	28.1%	19.4%	16.4%	15.0%	20	17.5%	9.3%	17.9%	12.7%
Middle	62	54.4%	48.7%	63.5%	59.7%	29	25.4%	15.9%	24.7%	22.3%
Upper	20	17.5%	31.9%	20.0%	25.2%	42	36.8%	52.0%	38.0%	46.4%
Unknown	0	0.0%	0.0%	0.1%	0.1%	13	11.4%	20.4%	12.9%	15.4%
<i>Total</i>	<i>114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	12	20.7%	30.1%		17.4%	14.7%				
Middle	33	56.9%	58.6%		54.8%	77.0%				
Upper	13	22.4%	11.3%		15.2%	6.1%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		12.5%	2.2%				
<i>Total</i>	<i>58</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>				
<b>By Revenue</b>										
\$1 Million or Less	37	63.8%	33.0%		27.4%	20.1%				
<b>By Loan Size</b>										
\$100,000 or less	42	72.4%	25.3%		90.4%	25.8%				
\$100,001-\$250,000	9	15.5%	21.8%		3.6%	13.2%				
\$250,001-\$1 Million	7	12.1%	52.9%		6.0%	61.0%				
<i>Total</i>	<i>58</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>				

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 15380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)
	<b>Home Purchase</b>									
Low	64	3.9%	2.3%	2.3%	1.1%	200	12.1%	6.1%	10.5%	5.9%
Moderate	194	11.8%	7.1%	11.0%	6.5%	407	24.7%	17.6%	23.2%	17.9%
Middle	688	41.7%	33.2%	43.3%	35.6%	316	19.1%	18.4%	22.9%	22.9%
Upper	705	42.7%	57.4%	43.5%	56.8%	426	25.8%	38.3%	26.2%	38.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	302	18.3%	19.6%	17.2%	14.9%
<i>Total</i>	<i>1,651</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,651</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Refinance</b>									
Low	18	1.3%	1.0%	0.9%	0.5%	62	4.6%	2.6%	5.2%	2.8%
Moderate	114	8.4%	5.4%	6.6%	4.2%	247	18.2%	12.8%	15.1%	10.4%
Middle	558	41.0%	33.6%	38.7%	31.2%	377	27.7%	23.9%	25.5%	22.2%
Upper	670	49.3%	60.1%	53.8%	64.1%	524	38.5%	49.4%	38.2%	47.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	150	11.0%	11.3%	16.1%	16.6%
<i>Total</i>	<i>1,360</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,360</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Home Improvement</b>									
Low	24	8.1%	4.9%	4.5%	2.3%	56	18.9%	4.7%	14.3%	4.6%
Moderate	50	16.9%	7.2%	15.0%	6.6%	84	28.4%	17.1%	22.8%	15.0%
Middle	135	45.6%	40.7%	44.8%	34.7%	78	26.4%	25.2%	23.5%	22.2%
Upper	87	29.4%	47.3%	35.8%	56.4%	62	20.9%	37.5%	29.0%	46.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	5.4%	15.5%	10.5%	11.9%
<i>Total</i>	<i>296</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>296</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Multi-Family</b>									
Low	3	17.6%	15.3%	9.4%	5.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	19.6%	15.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	10	58.8%	51.3%	42.8%	39.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	23.5%	33.4%	28.3%	38.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>17</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>17</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>HMDA Totals</b>									
Low	109	3.3%	3.1%	1.9%	1.2%	318	9.6%	4.1%	8.3%	4.1%
Moderate	358	10.8%	5.8%	9.3%	6.1%	738	22.2%	14.1%	19.5%	13.4%
Middle	1,391	41.8%	35.1%	41.3%	33.9%	771	23.2%	19.0%	24.0%	21.1%
Upper	1,466	44.1%	56.1%	47.5%	58.8%	1,012	30.4%	39.1%	31.6%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	485	14.6%	23.7%	16.7%	21.0%
<i>Total</i>	<i>3,324</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3,324</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)
Low	72	8.4%	9.2%	6.6%	7.5%					
Moderate	130	15.2%	15.6%	13.1%	15.8%					
Middle	333	38.9%	38.0%	40.5%	41.6%					
Upper	320	37.4%	37.2%	37.1%	34.4%					
Unknown	1	0.1%	0.0%	0.1%	0.1%					
Tract Unknown	0	0.0%	0.0%	2.6%	0.5%					
<i>Total</i>	<i>856</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
	<b>By Revenue</b>									
\$1 Million or Less	408	47.7%	22.7%	26.6%	26.3%					
	<b>By Loan Size</b>									
\$100,000 or less	477	55.7%	13.3%	94.1%	33.3%					
\$100,001-\$250,000	189	22.1%	23.3%	2.9%	16.3%					
\$250,001-\$1 Million	190	22.2%	63.4%	3.0%	50.4%					
<i>Total</i>	<i>856</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 40380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate %	Bank %	Aggregate %	#	Bank %	Aggregate %	Bank %	Aggregate %
<b>Home Purchase</b>										
Low	18	2.1%	1.2%	2.0%	1.3%	104	12.4%	5.9%	10.5%	5.9%
Moderate	108	12.9%	6.6%	11.0%	6.9%	222	26.5%	16.9%	22.1%	16.8%
Middle	471	56.1%	40.5%	54.6%	48.1%	143	17.0%	13.2%	20.8%	19.7%
Upper	242	28.8%	51.7%	32.3%	43.8%	173	20.6%	26.9%	27.9%	39.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	197	23.5%	37.1%	18.8%	18.2%
<i>Total</i>	<i>839</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>839</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	8	1.5%	0.9%	1.2%	0.7%	19	3.6%	1.9%	6.0%	3.3%
Moderate	37	7.0%	5.1%	7.2%	4.7%	101	19.0%	13.5%	16.8%	11.5%
Middle	295	55.6%	49.9%	52.7%	45.9%	133	25.0%	21.8%	23.8%	20.2%
Upper	191	36.0%	44.2%	38.9%	48.7%	212	39.9%	50.8%	42.9%	54.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	66	12.4%	12.0%	10.5%	10.8%
<i>Total</i>	<i>531</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>531</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	5	3.4%	1.1%	2.5%	1.1%	18	12.2%	3.5%	11.8%	5.0%
Moderate	22	15.0%	5.2%	14.1%	7.7%	37	25.2%	14.8%	26.4%	16.3%
Middle	90	61.2%	56.3%	60.4%	57.2%	53	36.1%	21.6%	27.9%	25.3%
Upper	30	20.4%	37.4%	22.9%	34.0%	36	24.5%	41.2%	30.8%	47.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.0%	19.0%	3.2%	5.9%
<i>Total</i>	<i>147</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>147</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	3	13.0%	9.2%	18.1%	11.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	30.4%	48.9%	21.9%	31.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	9	39.1%	27.8%	47.6%	34.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	17.4%	14.1%	12.4%	22.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	34	2.2%	3.6%	1.8%	1.4%	141	9.2%	3.1%	8.6%	4.5%
Moderate	174	11.3%	19.1%	9.7%	6.8%	360	23.4%	11.0%	20.1%	13.7%
Middle	865	56.2%	38.9%	54.4%	46.8%	329	21.4%	11.3%	22.8%	19.3%
Upper	467	30.3%	38.4%	34.2%	45.0%	421	27.3%	24.4%	34.8%	44.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	289	18.8%	50.2%	13.7%	17.5%
<i>Total</i>	<i>1,540</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,540</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate %	Bank %	Aggregate %					
Low	89	13.7%	17.7%	7.4%	11.7%					
Moderate	62	9.6%	8.1%	14.4%	11.8%					
Middle	290	44.7%	45.8%	48.8%	49.8%					
Upper	207	31.9%	28.4%	26.1%	25.8%					
Unknown	1	0.2%	0.0%	0.1%	0.1%					
Tract Unknown	0	0.0%	0.0%	3.1%	0.9%					
<i>Total</i>	<i>649</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
<b>By Revenue</b>										
\$1 Million or Less	300	46.2%	23.3%	28.7%	29.5%					
<b>By Loan Size</b>										
\$100,000 or less	363	55.9%	13.9%	94.0%	33.5%					
\$100,001-\$250,000	153	23.6%	24.3%	2.9%	15.8%					
\$250,001-\$1 Million	133	20.5%	61.8%	3.0%	50.6%					
<i>Total</i>	<i>649</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 45060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	15	3.9%	2.5%	2.4%	1.3%	23	6.0%	3.6%	9.7%	5.5%
Moderate	42	10.9%	7.4%	11.8%	7.5%	63	16.4%	13.5%	21.8%	16.8%
Middle	147	38.3%	34.4%	39.6%	35.9%	55	14.3%	13.6%	21.4%	20.8%
Upper	180	46.9%	55.7%	46.2%	55.3%	54	14.1%	22.0%	29.8%	41.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	189	49.2%	47.3%	17.2%	15.4%
<b>Total</b>	<b>384</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>384</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	7	1.7%	0.7%	1.1%	0.6%	24	6.0%	3.6%	5.6%	2.9%
Moderate	38	9.5%	6.2%	7.8%	4.4%	58	14.5%	11.6%	14.9%	9.7%
Middle	152	37.9%	34.3%	39.6%	34.8%	101	25.2%	21.4%	23.3%	19.0%
Upper	204	50.9%	58.8%	51.5%	60.2%	139	34.7%	41.4%	44.9%	55.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	79	19.7%	22.0%	11.2%	12.8%
<b>Total</b>	<b>401</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>401</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	3	2.6%	9.3%	4.5%	2.5%	20	17.2%	9.3%	12.2%	6.5%
Moderate	15	12.9%	9.8%	10.7%	5.8%	50	43.1%	34.1%	25.7%	15.3%
Middle	51	44.0%	43.0%	43.4%	39.2%	21	18.1%	23.0%	22.7%	18.2%
Upper	45	38.8%	36.8%	41.2%	52.6%	24	20.7%	26.5%	37.0%	54.2%
Unknown	0	1.7%	1.2%	0.2%	0.0%	1	0.9%	7.1%	2.3%	5.8%
<b>Total</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	2	28.6%	1.0%	28.9%	16.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	14.3%	25.5%	21.1%	16.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	10.5%	1.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	57.1%	73.5%	39.5%	65.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	27	3.0%	1.6%	2.1%	1.2%	67	7.4%	3.4%	8.1%	4.2%
Moderate	96	10.6%	8.4%	9.9%	6.1%	171	18.8%	11.8%	19.0%	13.1%
Middle	350	38.5%	31.6%	39.9%	34.9%	177	19.5%	16.0%	22.4%	19.5%
Upper	433	47.7%	58.3%	48.1%	57.7%	217	23.9%	28.9%	37.3%	47.9%
Unknown	2	0.2%	0.0%	0.0%	0.0%	276	30.4%	39.9%	13.2%	15.3%
<b>Total</b>	<b>908</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>908</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	69	17.4%	19.2%		12.9%	16.5%				
Moderate	48	12.1%	9.7%		10.5%	10.8%				
Middle	151	38.1%	37.4%		40.2%	41.5%				
Upper	128	32.3%	33.6%		32.5%	30.2%				
Unknown	0	0.0%	0.0%		0.1%	0.0%				
Tract Unknown	0	0.0%	0.0%		3.8%	0.9%				
<b>Total</b>	<b>396</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	206	52.0%	32.7%		26.7%	23.4%				
<b>By Loan Size</b>										
\$100,000 or less	236	59.6%	16.5%		93.5%	30.2%				
\$100,001-\$250,000	87	22.0%	24.6%		3.0%	15.2%				
\$250,001-\$1 Million	73	18.4%	58.9%		3.4%	54.6%				
<b>Total</b>	<b>396</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 13780

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
	<b>Home Purchase</b>									
Low	7	4.7%	3.2%	2.5%	1.8%	11	7.4%	4.4%	9.4%	5.6%
Moderate	20	13.5%	11.3%	9.5%	6.5%	35	23.6%	19.4%	24.3%	19.8%
Middle	68	45.9%	43.0%	54.3%	50.2%	33	22.3%	19.0%	24.8%	24.8%
Upper	53	35.8%	42.6%	33.7%	41.5%	45	30.4%	41.2%	29.4%	40.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	16.2%	16.0%	12.0%	9.6%
<b>Total</b>	<b>148</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>148</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	7	3.3%	1.6%	1.2%	0.7%	12	5.6%	3.4%	5.4%	3.0%
Moderate	25	11.6%	7.1%	5.5%	3.8%	35	16.3%	12.2%	16.9%	11.7%
Middle	99	46.0%	43.5%	55.7%	52.1%	65	30.2%	25.6%	24.1%	20.4%
Upper	84	39.1%	47.8%	37.5%	43.4%	90	41.9%	54.2%	44.2%	54.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	6.0%	4.6%	9.3%	10.2%
<b>Total</b>	<b>215</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>215</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	2	3.3%	1.3%	1.5%	1.1%	10	16.7%	7.3%	13.3%	4.6%
Moderate	9	15.0%	10.0%	7.9%	5.4%	20	33.3%	25.8%	19.5%	12.6%
Middle	39	65.0%	73.4%	68.9%	61.8%	14	23.3%	20.3%	28.5%	24.9%
Upper	10	16.7%	15.3%	21.8%	31.7%	14	23.3%	45.0%	35.4%	54.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.3%	1.6%	3.4%	3.9%
<b>Total</b>	<b>60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	1	25.0%	2.9%	17.2%	3.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	24.1%	41.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	75.0%	97.1%	55.2%	55.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	3.4%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	17	4.0%	2.4%	1.9%	1.3%	33	7.7%	3.3%	8.0%	4.0%
Moderate	54	12.6%	7.6%	7.6%	7.5%	90	21.1%	13.2%	20.3%	14.5%
Middle	209	48.9%	51.6%	56.6%	51.9%	112	26.2%	19.4%	24.8%	21.2%
Upper	147	34.4%	38.5%	34.0%	39.3%	149	34.9%	41.4%	36.7%	44.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	43	10.1%	22.7%	10.3%	15.5%
<b>Total</b>	<b>427</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>427</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank		Aggregate						
		%	% \$(000s)	%	% \$(000s)					
Low	26	11.1%	9.6%	8.3%	11.4%					
Moderate	29	12.4%	11.6%	13.1%	13.5%					
Middle	115	49.1%	49.5%	46.2%	48.6%					
Upper	64	27.4%	29.2%	28.2%	25.8%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	4.2%	0.8%					
<b>Total</b>	<b>234</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	128	54.7%	34.8%	35.2%	40.4%					
	<b>By Loan Size</b>									
\$100,000 or less	148	63.2%	17.5%	93.9%	32.5%					
\$100,001-\$250,000	48	20.5%	25.0%	3.3%	17.8%					
\$250,001-\$1 Million	38	16.2%	57.4%	2.9%	49.7%					
<b>Total</b>	<b>234</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 10580

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	17	3.8%	2.0%	3.1%	1.7%	51	11.3%	6.5%	9.1%	5.2%
Moderate	46	10.2%	6.7%	9.2%	6.3%	112	24.8%	20.0%	24.3%	19.2%
Middle	259	57.3%	51.0%	55.6%	53.1%	96	21.2%	21.7%	24.9%	25.0%
Upper	130	28.8%	40.3%	32.0%	38.8%	96	21.2%	28.0%	29.3%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	97	21.5%	23.8%	12.4%	10.7%
<b>Total</b>	<b>452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	9	3.6%	2.8%	1.8%	1.1%	12	4.8%	2.4%	5.1%	2.8%
Moderate	24	9.6%	6.2%	6.4%	4.8%	49	19.5%	14.6%	15.8%	11.7%
Middle	135	53.8%	50.0%	55.9%	53.7%	65	25.9%	24.5%	23.7%	21.7%
Upper	83	33.1%	41.0%	35.9%	40.4%	72	28.7%	38.7%	39.0%	46.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	53	21.1%	19.8%	16.4%	17.1%
<b>Total</b>	<b>251</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>251</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	2.4%	1.8%	5	12.5%	0.8%	10.4%	5.4%
Moderate	3	7.5%	0.8%	9.7%	6.8%	7	17.5%	1.1%	20.7%	14.5%
Middle	32	80.0%	80.6%	59.8%	56.9%	7	17.5%	15.7%	27.0%	23.5%
Upper	5	12.5%	18.7%	28.0%	34.5%	14	35.0%	23.1%	37.6%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	17.5%	59.3%	4.3%	7.0%
<b>Total</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	16.4%	2.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.0%	10.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	8	61.5%	58.1%	41.4%	50.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	5	38.5%	41.9%	22.1%	36.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	26	3.4%	0.9%	2.4%	1.5%	68	9.0%	1.9%	6.7%	3.4%
Moderate	73	9.7%	2.5%	7.7%	5.9%	168	22.2%	7.0%	19.0%	13.3%
Middle	434	57.4%	55.4%	55.9%	53.2%	168	22.2%	8.8%	24.2%	20.8%
Upper	223	29.5%	41.2%	34.1%	39.4%	182	24.1%	12.3%	35.3%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	170	22.5%	70.0%	14.8%	22.6%
<b>Total</b>	<b>756</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>756</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	16	9.2%	11.8%	7.1%	10.7%					
Moderate	26	14.9%	15.6%	12.2%	12.9%					
Middle	90	51.7%	44.9%	50.0%	51.2%					
Upper	42	24.1%	27.7%	26.5%	24.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	4.2%	1.0%					
<b>Total</b>	<b>174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	63	36.2%	20.8%	27.9%	27.9%					
<b>By Loan Size</b>										
\$100,000 or less	78	44.8%	7.7%	93.9%	30.4%					
\$100,001-\$250,000	38	21.8%	16.8%	3.0%	16.3%					
\$250,001-\$1 Million	58	33.3%	75.5%	3.1%	53.3%					
<b>Total</b>	<b>174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases



**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 39100

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	19	9.9%	9.3%	4.0%	3.7%	27	14.1%	10.4%	6.0%	3.1%
Moderate	29	15.1%	12.1%	9.6%	6.6%	47	24.5%	20.5%	22.1%	16.6%
Middle	99	51.6%	52.1%	55.7%	54.6%	36	18.8%	19.4%	30.0%	29.4%
Upper	45	23.4%	26.5%	30.6%	35.1%	40	20.8%	27.1%	31.1%	40.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	42	21.9%	22.6%	10.8%	10.8%
<i>Total</i>	<i>192</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>192</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	2	1.6%	1.3%	1.8%	1.7%	6	4.7%	2.5%	5.2%	3.1%
Moderate	9	7.1%	5.0%	8.0%	6.5%	21	16.5%	10.5%	14.3%	10.6%
Middle	82	64.6%	66.8%	57.2%	56.6%	23	18.1%	14.9%	27.2%	24.5%
Upper	34	26.8%	27.0%	32.9%	35.3%	45	35.4%	45.8%	41.0%	47.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	25.2%	26.3%	12.4%	14.0%
<i>Total</i>	<i>127</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>127</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.4%	0.8%	6	22.2%	4.0%	12.0%	5.2%
Moderate	2	7.4%	1.1%	8.7%	6.4%	10	37.0%	9.6%	21.6%	14.8%
Middle	19	70.4%	93.7%	63.4%	57.9%	3	11.1%	1.5%	29.4%	28.4%
Upper	6	22.2%	5.2%	26.5%	34.8%	8	29.6%	84.9%	32.2%	43.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.8%	7.7%
<i>Total</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	2	28.6%	1.1%	17.9%	8.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	14.3%	1.0%	25.0%	10.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	42.9%	97.5%	50.0%	77.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	14.3%	0.4%	7.1%	3.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	23	6.5%	4.8%	2.7%	2.7%	39	11.0%	5.5%	5.7%	3.0%
Moderate	41	11.6%	7.2%	8.7%	6.7%	78	22.1%	12.6%	17.3%	12.4%
Middle	203	57.5%	67.5%	56.9%	57.0%	62	17.6%	13.4%	28.2%	25.1%
Upper	86	24.4%	20.5%	31.7%	33.6%	93	26.3%	27.6%	36.9%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	81	22.9%	41.0%	11.9%	17.0%
<i>Total</i>	<i>353</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>353</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	12	5.8%		4.0%		9.2%		8.4%		
Moderate	25	12.1%		18.0%		11.6%		14.9%		
Middle	127	61.7%		58.9%		49.6%		50.2%		
Upper	42	20.4%		19.0%		24.6%		23.8%		
Unknown	0	0.0%		0.0%		0.0%		0.0%		
Tract Unknown	0	0.0%		0.0%		5.1%		2.7%		
<i>Total</i>	<i>206</i>	<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		
<b>By Revenue</b>										
\$1 Million or Less	125		60.7%		24.0%		35.2%		33.6%	
<b>By Loan Size</b>										
\$100,000 or less	137		66.5%		17.7%		95.9%		41.6%	
\$100,001-\$250,000	37		18.0%		22.4%		2.2%		15.4%	
\$250,001-\$1 Million	32		15.5%		59.9%		1.9%		43.0%	
<i>Total</i>	<i>206</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 46540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	2	1.0%	0.4%	1.7%	0.8%	12	5.8%	3.2%	7.9%	4.5%
Moderate	17	8.2%	5.2%	8.3%	4.9%	30	14.4%	10.5%	23.1%	17.7%
Middle	107	51.4%	45.8%	58.2%	53.9%	33	15.9%	15.4%	23.7%	23.7%
Upper	82	39.4%	48.6%	31.8%	40.4%	57	27.4%	35.0%	26.5%	37.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	76	36.5%	35.8%	18.7%	16.2%
<b>Total</b>	<b>208</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>208</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	2	1.3%	0.4%	1.2%	0.5%	6	4.0%	2.3%	5.1%	2.5%
Moderate	5	3.4%	2.4%	4.8%	2.8%	27	18.1%	12.6%	15.5%	10.2%
Middle	82	55.0%	52.6%	56.3%	53.0%	41	27.5%	25.0%	24.7%	20.3%
Upper	60	40.3%	44.6%	37.8%	43.7%	58	38.9%	48.4%	47.5%	58.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	11.4%	11.7%	7.2%	8.7%
<b>Total</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	4	6.5%	1.1%	2.8%	1.5%	9	14.5%	4.2%	11.3%	6.2%
Moderate	4	6.5%	1.9%	7.1%	5.7%	16	25.8%	8.3%	21.7%	13.1%
Middle	42	67.7%	63.0%	63.6%	59.0%	17	27.4%	29.8%	25.5%	23.5%
Upper	12	19.4%	34.0%	26.5%	33.9%	20	32.3%	57.7%	40.0%	55.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.4%	1.6%
<b>Total</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	5.6%	0.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	16.7%	2.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	66.7%	92.4%	55.6%	87.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	33.3%	7.6%	22.2%	9.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	8	1.9%	0.4%	1.6%	0.7%	27	6.4%	2.6%	7.1%	3.5%
Moderate	26	6.1%	3.6%	6.5%	3.8%	73	17.2%	10.1%	19.3%	13.3%
Middle	235	55.3%	53.4%	58.1%	54.4%	91	21.4%	17.5%	24.4%	21.5%
Upper	156	36.7%	42.7%	33.8%	41.1%	135	31.8%	36.5%	38.3%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	99	23.3%	33.3%	11.0%	13.4%
<b>Total</b>	<b>425</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>425</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>		<b>Aggregate</b>		<b>%</b>		<b>% \$(000s)</b>		
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	
Low	6	5.0%	1.9%	4.1%	2.6%					
Moderate	7	5.8%	2.3%	12.4%	10.9%					
Middle	76	62.8%	63.8%	50.5%	50.7%					
Upper	31	25.6%	31.8%	27.1%	29.3%					
Unknown	1	0.8%	0.2%	1.5%	5.0%					
Tract Unknown	0	0.0%	0.0%	4.5%	1.4%					
<b>Total</b>	<b>121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	70	57.9%	25.7%	31.0%	34.0%					
<b>By Loan Size</b>										
\$100,000 or less	82	67.8%	22.1%	94.6%	38.0%					
\$100,001-\$250,000	19	15.7%	16.2%	3.1%	18.4%					
\$250,001-\$1 Million	20	16.5%	61.7%	2.3%	43.7%					
<b>Total</b>	<b>121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 28740

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$ (000s)	Aggregate %	Aggregate % \$ (000s)	#	Bank %	Aggregate % \$ (000s)	Aggregate %	Aggregate % \$ (000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	10.6%	6.7%	4.9%	2.3%
Moderate	4	8.5%	6.3%	10.0%	8.0%	12	25.5%	22.1%	20.0%	14.1%
Middle	36	76.6%	73.3%	74.3%	72.3%	10	21.3%	18.9%	26.2%	24.1%
Upper	7	14.9%	20.4%	15.7%	19.8%	14	29.8%	38.3%	39.8%	51.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	12.8%	14.0%	9.1%	8.2%
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	1.7%	1.0%	5.9%	3.7%
Moderate	5	8.3%	5.3%	8.4%	6.3%	9	15.0%	10.9%	15.3%	11.2%
Middle	49	81.7%	87.4%	73.8%	74.0%	16	26.7%	26.6%	24.1%	21.5%
Upper	6	10.0%	7.3%	17.8%	19.6%	17	28.3%	32.3%	44.2%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	28.3%	29.1%	10.5%	11.2%
<b>Total</b>	<b>60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	4	26.7%	13.9%	13.8%	6.7%
Moderate	2	13.3%	9.8%	10.0%	7.5%	6	40.0%	41.0%	25.7%	19.9%
Middle	11	73.3%	73.8%	77.0%	80.7%	1	6.7%	4.9%	19.7%	19.1%
Upper	2	13.3%	16.4%	13.0%	11.7%	4	26.7%	40.2%	36.1%	45.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.8%	8.6%
<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	9.1%	6.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	63.6%	71.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	27.3%	22.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	10	8.2%	3.9%	6.1%	3.2%
Moderate	11	9.0%	5.8%	9.1%	7.0%	27	22.1%	16.6%	17.5%	12.2%
Middle	96	78.7%	80.4%	74.2%	73.5%	27	22.1%	22.7%	24.3%	21.8%
Upper	15	12.3%	13.8%	16.8%	19.5%	35	28.7%	35.3%	41.9%	50.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	18.9%	21.5%	10.2%	12.2%
<b>Total</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$ (000s)	Aggregate %	Aggregate % \$ (000s)		Bank %	Aggregate % \$ (000s)	Aggregate %	Aggregate % \$ (000s)
Low	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Moderate	11	14.9%	38.3%	10.2%	13.7%		10.2%	13.7%	10.2%	13.7%
Middle	53	71.6%	44.4%	64.9%	66.4%		64.9%	66.4%	64.9%	66.4%
Upper	10	13.5%	17.3%	17.4%	17.1%		17.4%	17.1%	17.4%	17.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	7.5%	2.9%		7.5%	2.9%	7.5%	2.9%
<b>Total</b>	<b>74</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	39	52.7%	15.2%	31.5%	27.4%		31.5%	27.4%	31.5%	27.4%
<b>By Loan Size</b>										
\$100,000 or less	51	68.9%	16.1%	97.7%	47.5%		97.7%	47.5%	97.7%	47.5%
\$100,001-\$250,000	7	9.5%	10.0%	0.9%	9.3%		0.9%	9.3%	0.9%	9.3%
\$250,001-\$1 Million	16	21.6%	73.9%	1.4%	43.2%		1.4%	43.2%	1.4%	43.2%
<b>Total</b>	<b>74</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 27060

Income Categories	HMDA										
	By Tract Income					By Borrower Income					
	Bank		Aggregate			Bank		Aggregate			
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
<b>Home Purchase</b>											
Low	0	0.0%	0.0%	0.1%	0.1%	2	10.0%	6.2%	9.1%	5.5%	
Moderate	1	5.0%	1.5%	11.4%	8.5%	1	5.0%	3.5%	25.1%	18.7%	
Middle	15	75.0%	68.1%	62.4%	57.1%	1	5.0%	8.2%	24.9%	23.6%	
Upper	4	20.0%	30.4%	26.1%	34.4%	8	40.0%	47.5%	35.9%	47.4%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	40.0%	34.6%	5.0%	4.8%	
<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>Refinance</b>											
Low	0	0.0%	0.0%	0.2%	0.2%	1	5.0%	3.4%	4.8%	2.2%	
Moderate	1	5.0%	8.5%	11.9%	8.9%	5	25.0%	16.7%	22.5%	14.9%	
Middle	13	65.0%	54.5%	61.5%	55.7%	3	15.0%	16.2%	27.3%	24.0%	
Upper	6	30.0%	36.9%	26.3%	35.1%	10	50.0%	59.3%	40.3%	53.3%	
Unknown	0	0.0%	0.0%	0.1%	0.1%	1	5.0%	4.3%	5.1%	5.6%	
<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>Home Improvement</b>											
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.5%	3.2%	
Moderate	1	20.0%	1.9%	12.7%	10.9%	1	20.0%	4.8%	26.4%	19.0%	
Middle	2	40.0%	14.4%	70.9%	58.6%	1	20.0%	78.8%	26.7%	20.7%	
Upper	2	40.0%	83.7%	16.4%	30.5%	3	60.0%	16.3%	32.6%	52.7%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	4.4%	
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>Multi-Family</b>											
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	2	100.0%	100.0%	31.3%	38.7%	0	0.0%	0.0%	0.0%	0.0%	
Middle	0	0.0%	0.0%	18.8%	6.8%	0	0.0%	0.0%	0.0%	0.0%	
Upper	0	0.0%	0.0%	50.0%	54.5%	0	0.0%	0.0%	0.0%	0.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%	
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>HMDA Totals</b>											
Low	0	0.0%	0.0%	0.1%	0.1%	3	6.4%	3.3%	7.3%	3.5%	
Moderate	5	10.6%	34.8%	12.0%	10.2%	7	14.9%	6.3%	23.9%	16.1%	
Middle	30	63.8%	41.2%	63.0%	54.3%	5	10.6%	9.6%	26.1%	22.5%	
Upper	12	25.5%	24.0%	24.8%	35.3%	21	44.7%	35.2%	37.1%	48.4%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	23.4%	45.6%	5.5%	9.4%	
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>SMALL BUSINESS</b>											
<b>By Tract Income</b>											
		Bank		Aggregate							
		#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low		0	0.0%	0.0%	0.3%	0.0%					
Moderate		5	25.0%	9.0%	21.6%	24.9%					
Middle		8	40.0%	40.2%	45.1%	38.9%					
Upper		7	35.0%	50.8%	26.2%	34.6%					
Unknown		0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown		0	0.0%	0.0%	6.8%	1.6%					
<b>Total</b>		<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>											
\$1 Million or Less		8	40.0%	13.3%	33.2%	30.4%					
<b>By Loan Size</b>											
\$100,000 or less		9	45.0%	12.1%	93.8%	37.2%					
\$100,001-\$250,000		8	40.0%	38.7%	3.5%	20.0%					
\$250,001-\$1 Million		3	15.0%	49.2%	2.7%	42.8%					
<b>Total</b>		<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	1.0%	0.4%	1	7.1%	6.3%	7.3%	4.2%
Moderate	2	14.3%	6.8%	22.5%	16.6%	3	21.4%	23.2%	22.7%	17.1%
Middle	6	42.9%	38.6%	38.3%	33.4%	3	21.4%	26.8%	27.5%	25.5%
Upper	6	42.9%	54.6%	38.2%	49.5%	2	14.3%	18.5%	33.5%	45.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	35.7%	25.2%	9.0%	7.8%
<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.9%	0.3%	0	0.0%	0.0%	5.4%	2.5%
Moderate	3	37.5%	24.0%	19.0%	12.1%	2	25.0%	16.3%	14.6%	8.6%
Middle	1	12.5%	8.4%	35.0%	30.9%	2	25.0%	29.1%	23.1%	17.5%
Upper	4	50.0%	67.6%	45.1%	56.8%	1	12.5%	19.7%	50.5%	64.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	37.5%	34.8%	6.4%	6.8%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	2.6%	1.6%	1	33.3%	2.6%	12.8%	4.7%
Moderate	1	33.3%	84.2%	24.4%	17.8%	1	33.3%	13.2%	17.8%	11.5%
Middle	1	33.3%	13.2%	38.3%	32.1%	1	33.3%	84.2%	25.9%	25.4%
Upper	1	33.3%	2.6%	34.7%	48.4%	0	0.0%	0.0%	39.3%	54.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	3.8%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	20.0%	0.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	40.0%	0.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	40.0%	99.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	1.3%	0.5%	2	8.0%	3.6%	7.6%	3.3%
Moderate	6	24.0%	17.9%	21.4%	13.8%	6	24.0%	19.9%	18.1%	11.9%
Middle	8	32.0%	25.3%	36.8%	30.3%	6	24.0%	30.9%	25.2%	20.5%
Upper	11	44.0%	56.9%	40.5%	55.4%	3	12.0%	18.0%	42.0%	52.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	32.0%	27.6%	7.1%	12.1%
<b>Total</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	3	13.6%	7.0%	14.8%	22.0%					
Moderate	10	45.5%	59.4%	26.4%	38.6%					
Middle	4	18.2%	28.5%	28.2%	15.1%					
Upper	5	22.7%	5.1%	27.8%	23.0%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.8%	1.2%					
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	10	45.5%	42.9%	29.2%	27.4%					
<b>By Loan Size</b>										
\$100,000 or less	15	68.2%	29.3%	91.9%	27.4%					
\$100,001-\$250,000	4	18.2%	21.4%	3.3%	13.4%					
\$250,001-\$1 Million	3	13.6%	49.3%	4.8%	59.2%					
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: NY Non-MSA Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.1%	0.0%	18	8.7%	5.2%	6.7%	3.7%
Moderate	15	7.2%	5.1%	8.1%	5.7%	49	23.7%	18.9%	22.5%	16.5%
Middle	162	78.3%	76.5%	79.9%	80.0%	49	23.7%	22.5%	24.9%	22.9%
Upper	30	14.5%	18.4%	11.7%	14.1%	63	30.4%	40.4%	32.0%	44.4%
Unknown	0	0.0%	0.0%	0.1%	0.1%	28	13.5%	13.0%	14.0%	12.6%
<b>Total</b>	<b>207</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>207</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.1%	0.1%	7	4.7%	2.9%	4.9%	2.6%
Moderate	15	10.1%	5.7%	6.6%	4.4%	30	20.1%	13.4%	14.9%	9.4%
Middle	116	77.9%	83.1%	79.8%	80.6%	36	24.2%	22.0%	25.9%	20.3%
Upper	18	12.1%	11.2%	13.5%	14.9%	59	39.6%	52.8%	45.4%	58.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	11.4%	8.9%	8.9%	9.5%
<b>Total</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.1%	0.1%	9	10.7%	4.2%	12.1%	5.6%
Moderate	6	7.1%	5.5%	7.9%	4.9%	30	35.7%	25.0%	25.4%	17.6%
Middle	67	79.8%	71.2%	83.3%	82.1%	23	27.4%	23.7%	28.9%	24.5%
Upper	11	13.1%	23.3%	8.8%	13.0%	22	26.2%	47.1%	30.8%	47.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.8%	4.4%
<b>Total</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	16.7%	23.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	5.6%	1.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	77.8%	75.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.1%	0.6%	34	7.7%	4.2%	7.1%	3.2%
Moderate	36	8.2%	5.4%	7.5%	4.9%	109	24.8%	16.8%	20.0%	12.9%
Middle	345	78.4%	79.2%	80.5%	80.3%	108	24.5%	22.3%	26.0%	21.3%
Upper	59	13.4%	15.5%	11.8%	14.1%	144	32.7%	45.8%	37.1%	49.9%
Unknown	0	0.0%	0.0%	0.1%	0.1%	45	10.2%	11.0%	9.8%	12.6%
<b>Total</b>	<b>440</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>440</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	6	3.8%	5.4%	1.6%	2.0%					
Moderate	18	11.4%	24.8%	10.5%	13.7%					
Middle	112	70.9%	59.1%	72.3%	72.9%					
Upper	22	13.9%	10.7%	8.9%	9.9%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	6.6%	1.4%					
<b>Total</b>	<b>158</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	81	51.3%	12.7%	31.6%	33.1%					
<b>By Loan Size</b>										
\$100,000 or less	103	65.2%	16.1%	93.5%	35.9%					
\$100,001-\$250,000	24	15.2%	17.5%	3.7%	18.7%					
\$250,001-\$1 Million	31	19.6%	66.4%	2.8%	45.4%					
<b>Total</b>	<b>158</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: NY Non-MSA Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.7%	0.4%	3	3.8%	2.2%	6.3%	3.7%
Moderate	1	1.3%	1.1%	1.0%	0.7%	12	15.2%	11.4%	22.1%	16.8%
Middle	66	83.5%	80.9%	75.7%	72.8%	21	26.6%	26.7%	24.0%	22.6%
Upper	12	15.2%	18.1%	22.6%	26.2%	21	26.6%	34.3%	31.5%	43.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	27.8%	25.3%	16.0%	13.9%
<b>Total</b>	<b>79</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>79</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	1	1.0%	0.6%	0.6%	0.4%	2	2.1%	1.6%	4.0%	2.1%
Moderate	0	0.0%	0.0%	0.5%	0.3%	8	8.2%	6.5%	13.8%	8.9%
Middle	56	57.7%	55.5%	73.7%	70.3%	29	29.9%	26.8%	24.3%	19.6%
Upper	40	41.2%	43.9%	25.2%	29.0%	44	45.4%	52.9%	48.7%	59.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	14.4%	12.2%	9.1%	9.7%
<b>Total</b>	<b>97</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>97</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.4%	0.2%	2	6.5%	4.7%	11.4%	4.4%
Moderate	1	3.2%	23.8%	1.1%	1.0%	6	19.4%	10.8%	23.1%	14.2%
Middle	24	77.4%	64.0%	74.9%	71.4%	7	22.6%	34.6%	26.6%	24.5%
Upper	6	19.4%	12.2%	23.6%	27.3%	15	48.4%	47.7%	36.8%	53.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.2%	2.3%	2.1%	3.8%
<b>Total</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	81.8%	69.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	18.2%	30.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	1	0.5%	0.3%	0.6%	0.4%	7	3.4%	1.9%	6.4%	2.9%
Moderate	2	1.0%	0.9%	0.8%	0.5%	26	12.6%	8.7%	18.8%	12.7%
Middle	146	70.5%	66.5%	74.7%	71.5%	57	27.5%	26.9%	24.6%	21.2%
Upper	58	28.0%	32.3%	23.9%	27.6%	80	38.6%	44.9%	39.7%	51.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	37	17.9%	17.6%	10.5%	11.5%
<b>Total</b>	<b>207</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>207</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	2	3.6%	1.6%	2.7%	3.9%					
Moderate	0	0.0%	0.0%	1.4%	1.0%					
Middle	37	66.1%	71.5%	69.1%	72.9%					
Upper	17	30.4%	26.9%	19.9%	20.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	7.0%	2.1%					
<b>Total</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	36	64.3%	36.3%	29.5%	26.9%					
<b>By Loan Size</b>										
\$100,000 or less	34	60.7%	17.9%	93.2%	33.4%					
\$100,001-\$250,000	14	25.0%	30.3%	3.6%	18.0%					
\$250,001-\$1 Million	8	14.3%	51.9%	3.2%	48.6%					
<b>Total</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: NY Non-MSA Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	5.0%	2.2%	3.1%	1.2%
Moderate	4	10.0%	6.3%	10.7%	7.6%	6	15.0%	13.4%	12.3%	9.1%
Middle	18	45.0%	44.1%	48.4%	49.5%	9	22.5%	19.5%	22.3%	20.3%
Upper	18	45.0%	49.5%	40.9%	42.8%	19	47.5%	57.7%	44.3%	55.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	10.0%	7.3%	17.9%	14.4%
<b>Total</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.1%	1.2%
Moderate	2	14.3%	15.1%	10.5%	8.2%	0	0.0%	0.0%	8.1%	5.2%
Middle	5	35.7%	26.1%	53.5%	54.1%	3	21.4%	14.4%	16.8%	13.3%
Upper	7	50.0%	58.7%	36.0%	37.7%	4	28.6%	35.1%	57.6%	63.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	50.0%	50.6%	15.4%	16.6%
<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.0%	1.6%
Moderate	0	0.0%	0.0%	10.0%	1.9%	1	33.3%	33.3%	10.0%	4.6%
Middle	3	100.0%	100.0%	58.0%	64.7%	1	33.3%	25.0%	34.0%	26.1%
Upper	0	0.0%	0.0%	32.0%	33.4%	1	33.3%	41.7%	48.0%	67.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.0%	0.3%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.3%	40.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	71.4%	36.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	14.3%	23.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	3.5%	1.5%	2.7%	1.2%
Moderate	6	10.5%	9.0%	10.6%	8.5%	7	12.3%	9.3%	9.9%	6.6%
Middle	26	45.6%	38.8%	51.7%	52.1%	13	22.8%	17.9%	19.8%	16.1%
Upper	25	43.9%	52.3%	37.7%	39.3%	24	42.1%	50.8%	51.2%	58.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	19.3%	20.4%	16.4%	17.2%
<b>Total</b>	<b>57</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>57</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	3	75.0%	97.1%	21.0%	24.6%	21.0%	24.6%	21.0%	24.6%	24.6%
Middle	1	25.0%	2.9%	38.9%	49.1%	38.9%	49.1%	38.9%	49.1%	49.1%
Upper	0	0.0%	0.0%	26.0%	20.7%	26.0%	20.7%	26.0%	20.7%	20.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	14.0%	5.6%	14.0%	5.6%	14.0%	5.6%	5.6%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	1	25.0%	2.9%	32.4%	25.1%	32.4%	25.1%	32.4%	25.1%	25.1%
<b>By Loan Size</b>										
\$100,000 or less	1	25.0%	2.9%	97.5%	49.9%	97.5%	49.9%	97.5%	49.9%	49.9%
\$100,001-\$250,000	2	50.0%	51.2%	1.5%	16.2%	1.5%	16.2%	1.5%	16.2%	16.2%
\$250,001-\$1 Million	1	25.0%	45.9%	1.0%	33.9%	1.0%	33.9%	1.0%	33.9%	33.9%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases



**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: NY Non-MSA Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)	#	%	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	1.1%
Moderate	1	4.3%	4.5%	11.6%	9.1%	1	4.3%	2.2%	11.8%	8.1%
Middle	15	65.2%	64.4%	68.1%	70.2%	7	30.4%	31.6%	35.2%	33.6%
Upper	7	30.4%	31.1%	20.3%	20.7%	6	26.1%	30.0%	40.0%	48.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	39.1%	36.1%	10.8%	8.9%
<b>Total</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.1%	1.6%
Moderate	1	8.3%	5.1%	5.9%	3.8%	0	0.0%	0.0%	10.4%	6.8%
Middle	11	91.7%	94.9%	70.4%	73.0%	2	16.7%	11.5%	18.7%	14.7%
Upper	0	0.0%	0.0%	23.6%	23.2%	8	66.7%	77.1%	46.1%	51.2%
Unknown	0	0.0%	0.0%	0.1%	0.0%	2	16.7%	11.4%	21.7%	25.7%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.8%	1.2%
Moderate	0	0.0%	0.0%	5.7%	5.2%	0	0.0%	0.0%	19.1%	16.8%
Middle	1	100.0%	100.0%	80.3%	80.4%	1	100.0%	100.0%	29.3%	21.8%
Upper	0	0.0%	0.0%	14.0%	14.4%	0	0.0%	0.0%	44.3%	57.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.5%	3.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	100.0%	100.0%	50.0%	98.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	1.2%
Moderate	2	5.3%	0.4%	8.5%	5.7%	1	2.6%	0.1%	12.1%	6.8%
Middle	27	71.1%	7.1%	70.5%	62.0%	10	26.3%	2.2%	27.4%	21.5%
Upper	9	23.7%	92.4%	21.0%	32.2%	14	36.8%	4.5%	43.0%	42.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	34.2%	93.1%	14.6%	27.6%
<b>Total</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
Moderate	0	0.0%	0.0%	0.0%	0.0%	15.5%	19.0%			
Middle	12	85.7%	75.2%	58.7%	54.5%					
Upper	2	14.3%	24.8%	21.4%	24.7%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	4.4%	1.8%					
<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	4	28.6%	8.8%	33.7%	37.4%					
<b>By Loan Size</b>										
\$100,000 or less	8	57.1%	19.2%	89.3%	32.9%					
\$100,001-\$250,000	3	21.4%	17.5%	6.5%	23.6%					
\$250,001-\$1 Million	3	21.4%	63.3%	4.2%	43.5%					
<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 12580

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	21	4.1%	2.0%	3.4%	1.7%	34	6.7%	2.5%	8.9%	4.3%
Moderate	74	14.5%	7.6%	13.2%	7.8%	84	16.5%	10.8%	22.1%	16.2%
Middle	212	41.7%	41.3%	40.7%	36.3%	68	13.4%	12.9%	21.2%	20.7%
Upper	202	39.7%	49.0%	42.6%	54.1%	116	22.8%	31.3%	32.5%	45.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	207	40.7%	42.5%	15.3%	13.1%
<i>Total</i>	<i>509</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>509</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	30	2.4%	1.3%	1.9%	1.1%	71	5.8%	2.7%	4.8%	2.5%
Moderate	157	12.8%	7.6%	8.6%	5.4%	165	13.5%	8.2%	12.4%	8.5%
Middle	459	37.5%	32.2%	36.4%	31.9%	212	17.3%	14.1%	19.3%	16.8%
Upper	579	47.3%	58.9%	53.1%	61.6%	408	33.3%	45.7%	40.0%	47.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	369	30.1%	29.3%	23.4%	24.6%
<i>Total</i>	<i>1,225</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,225</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	30	10.2%	10.0%	4.2%	1.5%	70	23.7%	7.7%	13.0%	4.7%
Moderate	76	25.8%	16.1%	12.8%	5.3%	79	26.8%	16.7%	21.1%	14.4%
Middle	117	39.7%	41.0%	39.0%	31.0%	75	25.4%	22.1%	24.0%	19.7%
Upper	71	24.1%	32.7%	43.9%	62.2%	64	21.7%	35.9%	37.6%	54.2%
Unknown	1	0.3%	0.2%	0.0%	0.0%	7	2.4%	17.6%	4.3%	7.0%
<i>Total</i>	<i>295</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>295</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	3	11.5%	2.0%	15.6%	3.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	26.9%	36.9%	28.9%	26.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	13	50.0%	50.9%	34.8%	35.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	11.5%	10.1%	20.7%	34.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	26	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	84	4.1%	1.8%	2.4%	1.3%	175	8.5%	1.6%	6.2%	3.0%
Moderate	314	15.3%	19.4%	10.0%	6.7%	328	16.0%	5.5%	15.4%	10.5%
Middle	801	39.0%	41.5%	37.7%	33.3%	355	17.3%	8.3%	20.0%	17.4%
Upper	855	41.6%	37.2%	49.9%	58.7%	588	28.6%	24.6%	37.8%	45.7%
Unknown	1	0.0%	0.0%	0.0%	0.0%	609	29.6%	60.0%	20.7%	23.4%
<i>Total</i>	<i>2,055</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,055</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)					
Low	34	4.6%	3.7%	4.7%	4.3%					
Moderate	105	14.2%	15.0%	11.5%	10.7%					
Middle	291	39.2%	39.0%	36.5%	37.9%					
Upper	309	41.6%	41.5%	44.9%	45.9%					
Unknown	3	0.4%	0.7%	0.3%	0.4%					
Tract Unknown	0	0.0%	0.0%	2.2%	0.8%					
<i>Total</i>	<i>742</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
<b>By Revenue</b>										
\$1 Million or Less	341	46.0%	26.4%	40.4%	28.6%					
<b>By Loan Size</b>										
\$100,000 or less	446	60.1%	18.6%	93.7%	34.0%					
\$100,001-\$250,000	156	21.0%	24.4%	2.9%	14.8%					
\$250,001-\$1 Million	140	18.9%	57.1%	3.4%	51.2%					
<i>Total</i>	<i>742</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25180

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	1	3.4%	1.3%	0.6%	0.4%	3	10.3%	4.5%	8.0%	4.5%
Moderate	4	13.8%	9.3%	14.0%	10.1%	8	27.6%	24.7%	22.8%	17.7%
Middle	15	51.7%	50.0%	54.7%	53.9%	3	10.3%	13.6%	22.6%	24.1%
Upper	9	31.0%	39.3%	30.8%	35.6%	6	20.7%	22.3%	28.0%	36.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	31.0%	34.9%	18.6%	16.9%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.0%	0.6%	3	2.5%	1.4%	4.8%	2.7%
Moderate	10	8.2%	7.3%	9.8%	6.9%	26	21.3%	14.8%	12.9%	9.0%
Middle	67	54.9%	51.8%	50.7%	49.2%	25	20.5%	16.2%	19.0%	16.5%
Upper	45	36.9%	40.9%	38.5%	43.3%	28	23.0%	27.0%	40.7%	47.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	32.8%	40.7%	22.6%	24.2%
<b>Total</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.8%	1.3%	7	24.1%	5.1%	9.2%	1.1%
Moderate	4	13.8%	3.3%	13.5%	3.8%	7	24.1%	9.5%	23.9%	17.8%
Middle	18	62.1%	87.4%	54.0%	54.3%	7	24.1%	13.9%	31.3%	38.4%
Upper	7	24.1%	9.3%	30.7%	40.7%	7	24.1%	23.8%	31.9%	38.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.4%	47.8%	3.7%	3.9%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	27.3%	3.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	36.4%	7.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	9.1%	23.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	100.0%	100.0%	27.3%	65.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	1	0.5%	0.1%	0.9%	0.6%	13	7.1%	1.3%	5.9%	3.2%
Moderate	18	9.9%	5.0%	11.3%	7.8%	41	22.5%	10.7%	16.3%	11.4%
Middle	100	54.9%	34.1%	52.0%	50.0%	35	19.2%	10.3%	20.5%	18.6%
Upper	63	34.6%	60.8%	35.8%	41.6%	41	22.5%	17.1%	36.4%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	52	28.6%	60.6%	20.9%	23.5%
<b>Total</b>	<b>182</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>182</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		<b>Bank</b>			<b>Aggregate</b>					
	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>% \$(000s)</b>
Low	4	4.3%	4.1%	6.4%	5.4%					
Moderate	24	26.1%	25.0%	16.3%	17.2%					
Middle	36	39.1%	46.5%	45.8%	45.9%					
Upper	28	30.4%	24.3%	27.7%	30.7%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.7%	0.7%					
<b>Total</b>	<b>92</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	47	51.1%	30.5%	34.3%	29.9%					
<b>By Loan Size</b>										
\$100,000 or less	65	70.7%	30.2%	92.2%	28.4%					
\$100,001-\$250,000	19	20.7%	32.6%	4.1%	18.2%					
\$250,001-\$1 Million	8	8.7%	37.2%	3.7%	53.4%					
<b>Total</b>	<b>92</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.5%	6.2%
Moderate	1	14.3%	11.8%	8.1%	5.4%	4	57.1%	59.4%	26.1%	21.8%
Middle	6	85.7%	88.2%	68.7%	65.5%	1	14.3%	14.7%	19.2%	18.5%
Upper	0	0.0%	0.0%	23.2%	29.1%	1	14.3%	14.2%	28.3%	37.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	14.3%	11.8%	16.8%	16.0%
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.1%	0.0%	2	5.7%	2.7%	6.0%	3.3%
Moderate	4	11.4%	9.5%	6.5%	4.8%	8	22.9%	15.0%	15.6%	11.6%
Middle	24	68.6%	62.3%	64.3%	61.2%	3	8.6%	5.9%	18.9%	16.8%
Upper	7	20.0%	28.2%	29.2%	33.9%	7	20.0%	30.1%	39.0%	45.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	42.9%	46.2%	20.5%	22.6%
<i>Total</i>	<i>35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	2.0%	1.1%	1	6.7%	4.0%	9.2%	6.3%
Moderate	5	33.3%	25.8%	7.1%	1.5%	3	20.0%	10.5%	13.3%	10.4%
Middle	7	46.7%	48.4%	61.2%	57.7%	9	60.0%	71.8%	27.6%	22.8%
Upper	3	20.0%	25.8%	29.6%	39.7%	2	13.3%	13.7%	44.9%	55.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.1%	5.2%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.1%	0.0%	3	5.3%	2.4%	7.2%	4.0%
Moderate	10	17.5%	10.1%	7.0%	4.6%	15	26.3%	20.7%	19.0%	13.9%
Middle	37	64.9%	65.3%	65.7%	64.9%	13	22.8%	8.5%	19.3%	16.3%
Upper	10	17.5%	24.5%	27.2%	30.4%	10	17.5%	27.7%	35.7%	40.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	28.1%	40.8%	18.8%	25.3%
<i>Total</i>	<i>57</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>57</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)			
Low	0	0.0%	0.0%	0.0%	0.0%	1.7%	1.7%			
Moderate	5	16.1%	16.1%	6.2%	6.2%	18.6%	18.9%			
Middle	16	51.6%	51.6%	73.0%	73.0%	55.5%	58.3%			
Upper	10	32.3%	32.3%	20.8%	20.8%	21.0%	20.0%			
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	3.2%	1.1%			
<i>Total</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>			
<b>By Revenue</b>										
\$1 Million or Less	14	45.2%	45.2%	33.0%	33.0%	48.5%	59.4%			
<b>By Loan Size</b>										
\$100,000 or less	16	51.6%	51.6%	11.1%	11.1%	91.7%	35.1%			
\$100,001-\$250,000	7	22.6%	22.6%	19.2%	19.2%	4.1%	16.6%			
\$250,001-\$1 Million	8	25.8%	25.8%	69.7%	69.7%	4.3%	48.3%			
<i>Total</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>			

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD Non-MSA Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	1.1%	0.5%	3	9.7%	3.6%	11.1%	5.2%
Moderate	2	6.5%	2.8%	19.2%	13.8%	6	19.4%	12.7%	22.7%	15.0%
Middle	23	74.2%	78.8%	69.1%	67.2%	6	19.4%	12.8%	16.2%	13.9%
Upper	6	19.4%	18.4%	10.7%	18.4%	11	35.5%	62.8%	34.0%	51.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	16.1%	8.1%	16.0%	14.1%
<b>Total</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.6%	0.4%	5	10.4%	3.4%	5.8%	3.0%
Moderate	8	16.7%	6.8%	14.5%	12.4%	11	22.9%	11.1%	14.5%	9.4%
Middle	32	66.7%	55.5%	72.4%	67.9%	7	14.6%	9.2%	19.7%	15.9%
Upper	8	16.7%	37.7%	12.4%	19.3%	16	33.3%	64.9%	41.4%	54.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	18.8%	11.5%	18.5%	17.6%
<b>Total</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	1	25.0%	24.2%	2.0%	0.1%	1	25.0%	21.2%	19.1%	3.0%
Moderate	1	25.0%	30.3%	13.2%	15.4%	1	25.0%	24.2%	21.1%	9.4%
Middle	2	50.0%	45.5%	78.9%	74.7%	1	25.0%	24.2%	23.0%	21.1%
Upper	0	0.0%	0.0%	5.9%	9.8%	1	25.0%	30.3%	30.9%	58.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.9%	8.4%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.0%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	80.0%	99.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	1	1.2%	0.0%	0.8%	0.4%	9	10.7%	2.5%	7.7%	3.5%
Moderate	11	13.1%	3.8%	15.7%	12.7%	18	21.4%	8.5%	16.9%	10.7%
Middle	58	69.0%	74.2%	71.8%	68.1%	14	16.7%	7.7%	18.9%	15.3%
Upper	14	16.7%	22.0%	11.7%	18.8%	28	33.3%	46.6%	39.1%	53.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	17.9%	34.7%	17.5%	17.4%
<b>Total</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Low	0	0.0%	0.0%	0.9%	2.2%					
Moderate	4	50.0%	66.4%	17.7%	25.4%					
Middle	3	37.5%	29.1%	64.9%	59.4%					
Upper	1	12.5%	4.4%	11.2%	11.5%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	5.3%	1.5%					
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	4	50.0%	9.0%	38.5%	39.3%					
<b>By Loan Size</b>										
\$100,000 or less	6	75.0%	19.3%	96.2%	43.6%					
\$100,001-\$250,000	0	0.0%	0.0%	1.8%	13.4%					
\$250,001-\$1 Million	2	25.0%	80.7%	2.0%	43.0%					
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD Non-MSA Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.7%	1.2%
Moderate	0	0.0%	0.0%	4.6%	3.3%	0	0.0%	0.0%	13.5%	9.8%
Middle	0	0.0%	0.0%	19.5%	17.2%	0	0.0%	0.0%	30.7%	28.5%
Upper	3	100.0%	100.0%	76.0%	79.5%	0	0.0%	0.0%	40.0%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	13.2%	12.4%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.7%	0.9%
Moderate	0	0.0%	0.0%	3.2%	2.4%	3	14.3%	10.0%	6.1%	4.2%
Middle	6	28.6%	26.9%	17.4%	16.6%	3	14.3%	11.3%	14.6%	11.9%
Upper	15	71.4%	73.1%	79.3%	81.0%	4	19.0%	16.7%	47.1%	49.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	52.4%	61.9%	30.5%	33.9%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	2.6%	7.5%	1.1%
Moderate	0	0.0%	0.0%	5.5%	2.2%	0	0.0%	0.0%	8.5%	3.5%
Middle	2	50.0%	4.1%	17.1%	16.5%	1	25.0%	1.2%	23.1%	22.1%
Upper	2	50.0%	95.9%	77.4%	81.3%	1	25.0%	2.9%	57.8%	65.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	93.3%	3.0%	7.7%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	5.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	94.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	3.6%	0.1%	2.1%	1.0%
Moderate	0	0.0%	0.0%	3.7%	2.7%	3	10.7%	8.1%	8.2%	5.8%
Middle	8	28.6%	22.0%	18.0%	18.2%	4	14.3%	9.2%	19.3%	16.7%
Upper	20	71.4%	78.0%	78.3%	79.1%	5	17.9%	13.7%	45.4%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	53.6%	68.8%	24.9%	28.5%
<i>Total</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0		0.0%		0.0%		0.0%		0.0%	0.0%
Moderate	0		0.0%		0.0%		4.7%		5.2%	5.2%
Middle	0		0.0%		0.0%		18.0%		13.6%	13.6%
Upper	1		100.0%		100.0%		71.7%		79.9%	79.9%
Unknown	0		0.0%		0.0%		0.0%		0.0%	0.0%
Tract Unknown	0		0.0%		0.0%		5.6%		1.2%	1.2%
<i>Total</i>	<i>1</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>
<b>By Revenue</b>										
\$1 Million or Less	<i>1</i>		<i>100.0%</i>		<i>100.0%</i>		<i>37.2%</i>		<i>42.0%</i>	<i>42.0%</i>
<b>By Loan Size</b>										
\$100,000 or less	<i>1</i>		<i>100.0%</i>		<i>100.0%</i>		<i>91.7%</i>		<i>26.2%</i>	<i>26.2%</i>
\$100,001-\$250,000	<i>0</i>		<i>0.0%</i>		<i>0.0%</i>		<i>3.1%</i>		<i>10.6%</i>	<i>10.6%</i>
\$250,001-\$1 Million	<i>0</i>		<i>0.0%</i>		<i>0.0%</i>		<i>5.2%</i>		<i>63.2%</i>	<i>63.2%</i>
<i>Total</i>	<i>1</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD Non-MSA Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.2%	1.6%
Moderate	1	6.7%	2.0%	8.2%	6.5%	1	6.7%	2.0%	8.7%	6.4%
Middle	14	93.3%	98.0%	91.7%	93.4%	2	13.3%	16.6%	12.1%	9.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	8	53.3%	56.0%	66.9%	72.5%
Unknown	0	0.0%	0.0%	0.1%	0.1%	4	26.7%	25.4%	9.1%	9.9%
<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	3.1%	1.6%	4.9%	3.0%
Moderate	2	6.3%	4.3%	9.2%	7.4%	8	25.0%	21.9%	11.1%	7.5%
Middle	30	93.8%	95.7%	90.8%	92.6%	6	18.8%	15.2%	18.4%	16.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	12	37.5%	44.8%	55.5%	63.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	15.6%	16.4%	10.1%	10.6%
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.3%	4.4%
Moderate	1	50.0%	54.5%	16.4%	6.6%	0	0.0%	0.0%	20.5%	24.4%
Middle	1	50.0%	45.5%	83.6%	93.4%	2	100.0%	100.0%	16.4%	10.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	46.6%	55.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.1%	5.3%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.0%	1.1%	4.4%	2.5%
Moderate	4	8.2%	3.6%	8.9%	7.0%	9	18.4%	15.2%	10.4%	7.3%
Middle	45	91.8%	96.4%	91.0%	92.9%	10	20.4%	15.9%	16.2%	13.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	20	40.8%	48.4%	59.2%	66.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	18.4%	19.4%	9.7%	10.5%
<b>Total</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
Moderate	1	25.0%		28.8%		18.2%				
Middle	3	75.0%		71.2%		77.9%				
Upper	0	0.0%		0.0%		0.0%				
Unknown	0	0.0%		0.0%		0.0%				
Tract Unknown	0	0.0%		0.0%		3.9%				
<b>Total</b>	<b>4</b>	<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	2	50.0%		37.0%		41.4%				41.2%
<b>By Loan Size</b>										
\$100,000 or less	2	50.0%		37.0%		92.2%				26.5%
\$100,001-\$250,000	2	50.0%		63.0%		2.9%				11.4%
\$250,001-\$1 Million	0	0.0%		0.0%		4.8%				62.1%
<b>Total</b>	<b>4</b>	<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>				<b>100.0%</b>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD Non-MSA Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	22.2%	7.5%	7.1%	2.6%
Moderate	3	33.3%	13.3%	24.6%	13.6%	3	33.3%	15.1%	12.4%	5.6%
Middle	6	66.7%	86.7%	75.4%	86.4%	1	11.1%	3.9%	13.7%	8.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	33.3%	73.4%	58.0%	74.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.9%	9.1%
<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	9.5%	4.9%	5.1%	2.1%
Moderate	11	52.4%	30.2%	28.8%	19.2%	7	33.3%	17.9%	11.2%	6.1%
Middle	10	47.6%	69.8%	71.2%	80.8%	6	28.6%	26.5%	17.1%	11.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	6	28.6%	50.7%	53.6%	67.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.0%	13.5%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	4	23.5%	10.9%	7.3%	0.7%
Moderate	8	47.1%	27.6%	50.0%	27.4%	7	41.2%	22.4%	26.8%	9.6%
Middle	9	52.9%	72.4%	50.0%	72.6%	2	11.8%	11.2%	22.0%	13.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	23.5%	55.4%	35.4%	72.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.5%	3.6%
<i>Total</i>	<i>17</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>17</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	8	17.0%	6.3%	5.8%	2.2%
Moderate	22	46.8%	23.3%	28.8%	17.8%	17	36.2%	17.0%	12.4%	6.1%
Middle	25	53.2%	76.7%	71.2%	82.2%	9	19.1%	16.8%	16.5%	10.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	13	27.7%	60.0%	53.8%	69.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.6%	11.9%
<i>Total</i>	<i>47</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>47</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	14	70.0%	71.4%		43.5%	35.6%				
Middle	6	30.0%	28.6%		50.2%	62.5%				
Upper	0	0.0%	0.0%		0.0%	0.0%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		6.3%	1.9%				
<i>Total</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>				
<b>By Revenue</b>										
\$1 Million or Less	<i>10</i>	<i>50.0%</i>	<i>17.0%</i>		<i>25.5%</i>		<i>31.7%</i>			
<b>By Loan Size</b>										
\$100,000 or less	15	75.0%	42.0%		93.0%		35.2%			
\$100,001-\$250,000	5	25.0%	58.0%		4.0%		19.8%			
\$250,001-\$1 Million	0	0.0%	0.0%		3.0%		45.0%			
<i>Total</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>			

Originations and Purchases



**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 49620

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	4	1.9%	0.6%	2.1%	1.0%	24	11.5%	4.7%	10.9%	6.5%
Moderate	14	6.7%	25.4%	4.9%	4.1%	59	28.4%	17.8%	25.9%	21.0%
Middle	140	67.3%	47.3%	69.3%	65.8%	43	20.7%	14.7%	24.3%	24.9%
Upper	50	24.0%	26.7%	23.8%	29.2%	50	24.0%	28.5%	24.8%	34.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	15.4%	34.3%	14.2%	13.7%
<b>Total</b>	<b>208</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>208</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	3	0.7%	0.5%	1.0%	0.5%	22	5.3%	2.9%	5.8%	3.3%
Moderate	22	5.3%	4.7%	4.0%	2.8%	64	15.4%	11.0%	16.0%	11.5%
Middle	285	68.5%	64.6%	68.8%	67.2%	87	20.9%	18.5%	22.2%	19.9%
Upper	106	25.5%	30.2%	26.3%	29.6%	154	37.0%	44.7%	34.9%	41.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	89	21.4%	22.9%	21.0%	23.4%
<b>Total</b>	<b>416</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>416</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	1	1.2%	0.3%	2.9%	1.3%	16	19.0%	24.5%	12.6%	7.2%
Moderate	7	8.3%	2.1%	6.9%	4.2%	19	22.6%	13.5%	24.0%	19.7%
Middle	65	77.4%	91.0%	66.3%	64.1%	17	20.2%	9.9%	27.3%	26.4%
Upper	11	13.1%	6.5%	23.9%	30.4%	28	33.3%	35.8%	32.7%	41.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	4.8%	16.3%	3.3%	4.8%
<b>Total</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	19.0%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	9.5%	1.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	61.9%	91.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	9.5%	6.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	8	1.1%	0.5%	1.4%	0.6%	62	8.7%	3.7%	7.8%	4.3%
Moderate	43	6.1%	11.7%	4.5%	3.2%	142	20.0%	12.7%	19.6%	14.6%
Middle	492	69.3%	61.3%	68.8%	67.1%	147	20.7%	15.8%	23.1%	21.4%
Upper	167	23.5%	26.6%	25.3%	29.1%	232	32.7%	35.8%	31.5%	38.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	127	17.9%	32.0%	18.1%	21.0%
<b>Total</b>	<b>710</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>710</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank			Aggregate					
		%	% \$(000s)	%	% \$(000s)	%	% \$(000s)			
Low	31	13.1%	14.2%	5.6%	9.4%					
Moderate	26	11.0%	11.4%	8.2%	10.3%					
Middle	136	57.4%	52.3%	64.6%	61.0%					
Upper	44	18.6%	22.1%	17.9%	18.5%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.7%	0.7%					
<b>Total</b>	<b>237</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	125	52.7%	28.2%	35.6%	33.7%					
<b>By Loan Size</b>										
\$100,000 or less	131	55.3%	13.1%	92.6%	31.3%					
\$100,001-\$250,000	54	22.8%	24.2%	3.7%	17.6%					
\$250,001-\$1 Million	52	21.9%	62.7%	3.8%	51.1%					
<b>Total</b>	<b>237</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25420

Income Categories	HMDA										
	By Tract Income					By Borrower Income					
	Bank		Aggregate			Bank		Aggregate			
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
	<b>Home Purchase</b>										
Low	1	0.9%	0.6%	1.2%	0.5%	12	11.2%	5.6%	11.4%	6.9%	
Moderate	23	21.5%	13.1%	13.1%	8.7%	24	22.4%	16.3%	25.8%	20.4%	
Middle	50	46.7%	42.4%	49.0%	44.8%	18	16.8%	16.7%	22.2%	22.5%	
Upper	33	30.8%	43.9%	36.7%	46.1%	28	26.2%	32.1%	28.4%	39.8%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	23.4%	29.2%	12.1%	10.4%	
<i>Total</i>	<i>107</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>107</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>Refinance</b>										
Low	2	0.9%	0.4%	0.9%	0.4%	10	4.3%	2.2%	5.9%	3.3%	
Moderate	17	7.2%	4.1%	9.9%	6.7%	48	20.4%	11.8%	16.7%	11.7%	
Middle	129	54.9%	45.7%	47.5%	43.3%	48	20.4%	14.4%	22.5%	19.6%	
Upper	87	37.0%	49.8%	41.8%	49.5%	86	36.6%	40.1%	36.9%	45.6%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	43	18.3%	31.5%	18.0%	19.9%	
<i>Total</i>	<i>235</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>235</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>Home Improvement</b>										
Low	2	4.4%	1.8%	1.3%	0.5%	5	11.1%	2.2%	10.4%	6.1%	
Moderate	11	24.4%	45.4%	13.3%	9.5%	21	46.7%	15.0%	23.5%	18.5%	
Middle	20	44.4%	15.7%	52.5%	45.6%	9	20.0%	35.2%	27.0%	21.6%	
Upper	12	26.7%	37.1%	32.9%	44.4%	10	22.2%	47.6%	36.9%	48.6%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	5.1%	
<i>Total</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>Multi-Family</b>										
Low	0	0.0%	0.0%	2.4%	1.3%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	4	66.7%	5.3%	47.0%	27.8%	0	0.0%	0.0%	0.0%	0.0%	
Middle	2	33.3%	94.7%	36.1%	41.5%	0	0.0%	0.0%	0.0%	0.0%	
Upper	0	0.0%	0.0%	14.5%	29.4%	0	0.0%	0.0%	0.0%	0.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	100.0%	100.0%	100.0%	100.0%	
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>HMDA Totals</b>										
Low	5	1.3%	0.3%	1.0%	0.5%	27	6.9%	2.3%	7.8%	4.4%	
Moderate	55	14.0%	6.7%	11.2%	8.1%	93	23.7%	9.4%	19.8%	14.2%	
Middle	201	51.1%	58.6%	48.2%	43.8%	75	19.1%	11.0%	22.6%	19.9%	
Upper	132	33.6%	34.4%	39.6%	47.6%	124	31.6%	27.3%	34.3%	42.3%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	74	18.8%	50.1%	15.5%	19.4%	
<i>Total</i>	<i>393</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>393</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>SMALL BUSINESS</b>										
	<b>By Tract Income</b>										
		Bank		Aggregate				Bank		Aggregate	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
Low	7	3.4%	0.6%				2.2%			2.1%	
Moderate	48	23.1%	22.0%				19.3%			19.6%	
Middle	88	42.3%	45.3%				46.7%			48.2%	
Upper	65	31.3%	32.2%				27.4%			29.4%	
Unknown	0	0.0%	0.0%				0.0%			0.0%	
Tract Unknown	0	0.0%	0.0%				4.4%			0.7%	
<i>Total</i>	<i>208</i>	<i>100.0%</i>	<i>100.0%</i>				<i>100.0%</i>			<i>100.0%</i>	
	<b>By Revenue</b>										
\$1 Million or Less	92	44.2%	23.6%				32.5%			33.4%	
	<b>By Loan Size</b>										
\$100,000 or less	123	59.1%	15.8%				91.9%			29.0%	
\$100,001-\$250,000	40	19.2%	18.4%				4.2%			18.6%	
\$250,001-\$1 Million	45	21.6%	65.8%				3.8%			52.4%	
<i>Total</i>	<i>208</i>	<i>100.0%</i>	<i>100.0%</i>				<i>100.0%</i>			<i>100.0%</i>	

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 42540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	1	0.4%	0.3%	0.9%	0.5%	24	10.6%	6.1%	9.1%	4.7%
Moderate	38	16.7%	10.6%	13.3%	8.1%	68	30.0%	22.2%	22.8%	16.6%
Middle	124	54.6%	54.6%	57.8%	55.4%	55	24.2%	23.9%	23.0%	21.2%
Upper	64	28.2%	34.5%	27.9%	36.0%	60	26.4%	38.8%	32.7%	47.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	8.8%	8.9%	12.3%	10.4%
<i>Total</i>	<i>227</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>227</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.4%	0.2%	7	2.9%	1.3%	5.4%	2.7%
Moderate	14	5.8%	3.4%	7.7%	4.8%	28	11.5%	6.6%	14.3%	9.5%
Middle	161	66.3%	59.9%	59.4%	56.1%	59	24.3%	19.5%	20.7%	16.8%
Upper	68	28.0%	36.7%	32.5%	38.9%	125	51.4%	63.8%	47.5%	57.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	9.9%	8.8%	12.1%	14.0%
<i>Total</i>	<i>243</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>243</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.8%	0.5%	16	24.2%	9.6%	12.2%	4.8%
Moderate	14	21.2%	12.9%	9.6%	5.3%	19	28.8%	15.3%	21.6%	14.1%
Middle	41	62.1%	52.9%	65.0%	58.4%	14	21.2%	11.8%	25.7%	21.7%
Upper	11	16.7%	34.2%	24.5%	35.8%	15	22.7%	20.4%	37.9%	56.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.0%	42.9%	2.6%	3.3%
<i>Total</i>	<i>66</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>66</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	3.2%	4.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	30.6%	5.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	80.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.1%	9.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	1	0.2%	0.1%	0.6%	0.5%	47	8.8%	3.5%	7.3%	3.3%
Moderate	66	12.3%	6.7%	9.7%	5.8%	115	21.5%	13.5%	17.6%	11.5%
Middle	326	60.8%	57.5%	59.5%	56.8%	128	23.9%	21.3%	21.9%	17.8%
Upper	143	26.7%	35.7%	30.2%	36.9%	200	37.3%	52.3%	41.8%	52.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	46	8.6%	9.3%	11.4%	15.3%
<i>Total</i>	<i>536</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>536</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank			Aggregate					
		%	% \$(000s)		%	% \$(000s)				
Low	4	2.6%	1.6%		4.3%	6.9%				
Moderate	28	18.3%	17.9%		12.6%	13.4%				
Middle	90	58.8%	67.8%		54.2%	55.7%				
Upper	31	20.3%	12.7%		21.9%	22.2%				
Unknown	0	0.0%	0.0%		0.3%	0.5%				
Tract Unknown	0	0.0%	0.0%		6.7%	1.2%				
<i>Total</i>	<i>153</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>				
<b>By Revenue</b>										
\$1 Million or Less	85	55.6%			40.8%			39.2%	36.8%	
<b>By Loan Size</b>										
\$100,000 or less	98	64.1%			24.6%			91.7%	34.9%	
\$100,001-\$250,000	36	23.5%			31.8%			4.5%	18.8%	
\$250,001-\$1 Million	19	12.4%			43.6%			3.7%	46.3%	
<i>Total</i>	<i>153</i>	<i>100.0%</i>			<i>100.0%</i>			<i>100.0%</i>	<i>100.0%</i>	

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: PA Non-MSA Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	8	7.8%	2.4%	6.9%	3.5%
Moderate	12	11.8%	7.4%	7.9%	4.4%	20	19.6%	11.6%	22.2%	15.6%
Middle	70	68.6%	60.0%	78.2%	75.7%	20	19.6%	15.3%	26.6%	24.9%
Upper	20	19.6%	32.6%	13.9%	19.8%	43	42.2%	59.3%	36.1%	49.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	10.8%	11.3%	8.2%	6.7%
<b>Total</b>	<b>102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	3.1%	1.4%	3.6%	1.9%
Moderate	7	4.3%	2.6%	4.9%	3.0%	14	8.7%	4.9%	13.0%	8.7%
Middle	107	66.5%	59.5%	76.4%	74.5%	24	14.9%	11.1%	21.8%	17.9%
Upper	47	29.2%	37.9%	18.5%	22.4%	93	57.8%	67.9%	48.9%	56.3%
Unknown	0	0.0%	0.0%	0.1%	0.1%	25	15.5%	14.7%	12.6%	15.2%
<b>Total</b>	<b>161</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>161</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	27	24.5%	14.5%	10.2%	3.2%
Moderate	21	19.1%	14.3%	9.8%	5.2%	29	26.4%	20.1%	19.4%	13.1%
Middle	76	69.1%	61.2%	79.0%	76.9%	17	15.5%	13.3%	23.7%	17.8%
Upper	13	11.8%	24.4%	10.9%	17.3%	36	32.7%	51.4%	43.5%	60.4%
Unknown	0	0.0%	0.0%	0.2%	0.6%	1	0.9%	0.6%	3.1%	5.5%
<b>Total</b>	<b>110</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>110</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	17.9%	9.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	82.1%	90.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	40	10.7%	2.1%	5.5%	2.5%
Moderate	40	10.7%	4.6%	6.6%	3.7%	63	16.9%	7.7%	16.8%	11.3%
Middle	253	67.8%	59.7%	77.3%	75.2%	61	16.4%	12.6%	23.6%	20.2%
Upper	80	21.4%	35.6%	16.0%	21.0%	172	46.1%	64.4%	43.8%	53.5%
Unknown	0	0.0%	0.0%	0.1%	0.1%	37	9.9%	13.1%	10.2%	12.6%
<b>Total</b>	<b>373</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>373</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.1%	0.0%				
Moderate	18	7.5%	4.2%		8.8%	7.8%				
Middle	173	71.8%	76.1%		70.6%	75.2%				
Upper	50	20.7%	19.7%		11.3%	14.5%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		9.2%	2.5%				
<b>Total</b>	<b>241</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	142	58.9%	33.7%		33.9%	39.6%				
<b>By Loan Size</b>										
\$100,000 or less	186	77.2%	28.5%		93.9%	34.0%				
\$100,001-\$250,000	29	12.0%	20.2%		3.0%	15.9%				
\$250,001-\$1 Million	26	10.8%	51.3%		3.0%	50.1%				
<b>Total</b>	<b>241</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 11020

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	5.7%	4.6%	8.7%	5.1%
Moderate	3	8.6%	6.7%	9.6%	5.0%	8	22.9%	17.2%	21.7%	17.1%
Middle	30	85.7%	86.7%	78.4%	78.8%	13	37.1%	31.8%	24.7%	24.3%
Upper	2	5.7%	6.6%	12.0%	16.2%	7	20.0%	35.8%	31.1%	42.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	14.3%	10.7%	13.8%	11.3%
<i>Total</i>	<i>35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.1%	0.1%	5	4.5%	2.2%	4.5%	2.3%
Moderate	6	5.4%	2.8%	5.4%	3.1%	14	12.5%	7.9%	16.4%	10.4%
Middle	79	70.5%	60.4%	78.6%	77.5%	25	22.3%	14.1%	22.2%	18.3%
Upper	27	24.1%	36.8%	15.9%	19.4%	55	49.1%	65.2%	45.1%	55.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	11.6%	10.6%	11.8%	13.5%
<i>Total</i>	<i>112</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>112</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	10	16.1%	17.3%	12.7%	5.6%
Moderate	2	3.2%	2.8%	6.0%	4.1%	14	22.6%	15.2%	21.0%	12.5%
Middle	55	88.7%	92.6%	82.6%	81.2%	22	35.5%	15.5%	26.7%	21.7%
Upper	5	8.1%	4.6%	11.4%	14.6%	15	24.2%	51.7%	36.7%	55.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.6%	0.4%	2.9%	4.6%
<i>Total</i>	<i>62</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>62</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	7.1%	2.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	7.1%	0.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	50.0%	4.0%	64.3%	67.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	50.0%	96.0%	21.4%	30.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.1%	0.1%	17	8.0%	2.8%	6.8%	3.3%
Moderate	11	5.2%	3.0%	6.6%	3.7%	36	16.9%	8.6%	18.4%	12.3%
Middle	166	77.9%	58.3%	79.0%	77.8%	60	28.2%	15.0%	23.4%	19.8%
Upper	36	16.9%	38.7%	14.2%	18.4%	77	36.2%	51.8%	39.9%	50.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	10.8%	21.8%	11.4%	14.3%
<i>Total</i>	<i>213</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>213</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>% \$(000s)</b>
Low	3	2.3%	0.3%			2.2%			0.8%	
Moderate	18	13.8%	19.2%			10.5%			8.6%	
Middle	88	67.7%	56.6%			63.6%			71.7%	
Upper	21	16.2%	23.8%			13.5%			17.9%	
Unknown	0	0.0%	0.0%			0.0%			0.0%	
Tract Unknown	0	0.0%	0.0%			10.2%			1.1%	
<i>Total</i>	<i>130</i>	<i>100.0%</i>	<i>100.0%</i>			<i>100.0%</i>			<i>100.0%</i>	
<b>By Revenue</b>										
\$1 Million or Less	69	53.1%				36.1%			36.9%	
<b>By Loan Size</b>										
\$100,000 or less	70	53.8%	11.7%			87.1%			21.1%	
\$100,001-\$250,000	31	23.8%	21.5%			6.0%			17.7%	
\$250,001-\$1 Million	29	22.3%	66.7%			6.9%			61.2%	
<i>Total</i>	<i>130</i>	<i>100.0%</i>	<i>100.0%</i>			<i>100.0%</i>			<i>100.0%</i>	

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 39740

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	1	1.9%	0.7%	4.4%	1.5%	2	3.8%	1.7%	11.4%	5.8%
Moderate	2	3.8%	2.4%	4.8%	2.7%	13	24.5%	22.0%	28.9%	24.2%
Middle	33	62.3%	53.5%	59.7%	56.6%	14	26.4%	22.8%	23.4%	24.2%
Upper	17	32.1%	43.4%	31.0%	39.1%	13	24.5%	30.4%	26.4%	36.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	20.8%	23.0%	10.0%	9.0%
<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>53</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.3%	0.5%	3	2.6%	1.3%	5.0%	3.0%
Moderate	0	0.0%	0.0%	2.5%	1.8%	14	12.2%	7.6%	15.9%	11.6%
Middle	68	59.1%	51.8%	57.8%	53.7%	27	23.5%	19.3%	23.8%	21.0%
Upper	47	40.9%	48.2%	38.4%	43.9%	24	20.9%	27.3%	41.4%	48.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	47	40.9%	44.5%	13.9%	15.5%
<i>Total</i>	<i>115</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>115</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	7.8%	1.2%	4	19.0%	16.8%	13.4%	4.6%
Moderate	3	14.3%	19.1%	6.8%	4.3%	9	42.9%	34.1%	26.6%	20.8%
Middle	14	66.7%	54.3%	60.6%	65.3%	2	9.5%	10.4%	23.7%	23.4%
Upper	4	19.0%	26.6%	24.8%	29.3%	6	28.6%	38.7%	33.8%	48.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.6%	3.0%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	22.2%	9.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.1%	33.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	55.6%	29.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	11.1%	28.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	1	0.5%	0.2%	2.8%	1.2%	9	4.7%	1.2%	7.7%	3.8%
Moderate	5	2.6%	0.7%	3.6%	3.4%	36	18.9%	10.1%	20.8%	15.5%
Middle	115	60.5%	42.6%	58.6%	54.1%	43	22.6%	16.6%	23.6%	21.3%
Upper	69	36.3%	56.5%	35.1%	41.4%	43	22.6%	23.1%	35.8%	43.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	59	31.1%	49.0%	12.1%	16.2%
<i>Total</i>	<i>190</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>190</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	11	10.0%	4.6%	6.3%	6.0%					
Moderate	3	2.7%	3.6%	7.5%	10.0%					
Middle	70	63.6%	57.6%	55.4%	53.5%					
Upper	26	23.6%	34.2%	26.0%	29.7%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	4.8%	0.8%					
<i>Total</i>	<i>110</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
<b>By Revenue</b>										
\$1 Million or Less	69	62.7%	31.5%	37.4%	33.8%					
<b>By Loan Size</b>										
\$100,000 or less	78	70.9%	21.8%	89.8%	24.8%					
\$100,001-\$250,000	16	14.5%	19.5%	4.9%	18.1%					
\$250,001-\$1 Million	16	14.5%	58.7%	5.3%	57.1%					
<i>Total</i>	<i>110</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 44300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank		Aggregate		#	Bank		Aggregate	
	%	% \$(000s)	%	% \$(000s)	%	%	% \$(000s)	%	% \$(000s)	
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.2%	0.1%	2	6.9%	4.3%	7.1%	3.9%
Moderate	4	13.8%	7.9%	10.7%	7.0%	5	17.2%	14.9%	18.5%	13.6%
Middle	12	41.4%	34.6%	55.4%	52.6%	6	20.7%	20.0%	24.6%	23.3%
Upper	13	44.8%	57.6%	33.6%	40.2%	14	48.3%	55.7%	40.3%	50.9%
Unknown	0	0.0%	0.0%	0.1%	0.1%	2	6.9%	5.1%	9.5%	8.4%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.4%	0.4%	4	4.6%	2.3%	3.9%	2.0%
Moderate	2	2.3%	2.6%	8.6%	6.2%	10	11.5%	7.3%	13.3%	8.9%
Middle	60	69.0%	65.5%	53.9%	51.4%	17	19.5%	15.6%	22.6%	18.7%
Upper	25	28.7%	31.9%	37.2%	42.1%	47	54.0%	65.8%	48.5%	57.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	10.3%	9.1%	11.7%	13.1%
<b>Total</b>	<b>87</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>87</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.5%	0.6%	2	14.3%	4.0%	13.3%	5.7%
Moderate	2	14.3%	2.0%	15.8%	12.3%	4	28.6%	3.7%	16.3%	9.1%
Middle	10	71.4%	32.1%	63.3%	57.9%	3	21.4%	7.4%	29.1%	29.2%
Upper	2	14.3%	65.9%	20.4%	29.1%	5	35.7%	84.9%	38.6%	50.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.7%	5.8%
<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	7.1%	1.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	28.6%	12.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	57.1%	85.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	7.1%	1.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.3%	0.4%	8	6.1%	1.1%	5.5%	2.6%
Moderate	8	6.1%	1.5%	9.7%	6.9%	19	14.4%	3.6%	15.0%	9.8%
Middle	84	63.6%	83.0%	55.0%	53.7%	26	19.7%	6.6%	23.6%	19.4%
Upper	40	30.3%	15.4%	34.9%	38.9%	66	50.0%	25.6%	45.3%	52.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	9.8%	63.0%	10.6%	16.1%
<b>Total</b>	<b>132</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>132</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank		Aggregate			Bank		Aggregate	
		%	% \$(000s)	%	% \$(000s)		%	% \$(000s)	%	% \$(000s)
Low	3	7.1%	0.5%				5.6%			5.2%
Moderate	4	9.5%	6.6%				9.9%			10.7%
Middle	22	52.4%	45.4%				50.1%			50.9%
Upper	11	26.2%	26.6%				29.5%			30.5%
Unknown	2	4.8%	20.9%				1.0%			1.8%
Tract Unknown	0	0.0%	0.0%				3.9%			0.9%
<b>Total</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>				<b>100.0%</b>			<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	27	64.3%	18.1%				42.6%			45.3%
<b>By Loan Size</b>										
\$100,000 or less	29	69.0%	19.2%				90.0%			29.2%
\$100,001-\$250,000	3	7.1%	5.6%				5.3%			19.2%
\$250,001-\$1 Million	10	23.8%	75.1%				4.7%			51.6%
<b>Total</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>				<b>100.0%</b>			<b>100.0%</b>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 29540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	3	4.7%	3.2%	1.9%	1.1%	7	10.9%	5.4%	11.2%	6.9%
Moderate	6	9.4%	5.1%	7.8%	4.9%	15	23.4%	22.1%	28.1%	23.5%
Middle	41	64.1%	66.1%	76.1%	75.9%	11	17.2%	16.3%	26.1%	27.1%
Upper	14	21.9%	25.6%	14.3%	18.2%	15	23.4%	30.6%	24.9%	33.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	25.0%	25.6%	9.7%	8.6%
<i>Total</i>	<i>64</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>64</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Refinance</b>									
Low	0	0.0%	0.0%	1.3%	0.8%	2	1.9%	1.0%	5.9%	3.3%
Moderate	3	2.9%	1.9%	4.3%	2.7%	16	15.5%	10.9%	18.4%	14.0%
Middle	81	78.6%	78.7%	76.9%	76.0%	15	14.6%	10.1%	24.9%	22.2%
Upper	19	18.4%	19.4%	17.5%	20.6%	40	38.8%	51.7%	35.6%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	30	29.1%	26.2%	15.2%	16.5%
<i>Total</i>	<i>103</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>103</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	2.7%	2.3%	2	11.1%	1.3%	9.1%	3.9%
Moderate	2	11.1%	1.8%	6.2%	4.0%	9	50.0%	17.2%	24.1%	18.7%
Middle	13	72.2%	92.1%	77.8%	76.2%	4	22.2%	9.5%	27.9%	26.9%
Upper	3	16.7%	6.2%	13.3%	17.4%	2	11.1%	70.5%	35.4%	46.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	1.5%	3.5%	4.0%
<i>Total</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	26.6%	8.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.1%	3.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	60.0%	3.9%	54.7%	67.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	40.0%	96.1%	4.7%	19.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>HMDA Totals</b>									
Low	3	1.6%	0.6%	1.7%	1.2%	11	5.8%	1.4%	7.8%	4.5%
Moderate	11	5.8%	1.7%	5.6%	3.5%	40	21.1%	8.7%	21.9%	17.0%
Middle	138	72.6%	45.9%	76.6%	75.7%	30	15.8%	7.2%	25.4%	23.3%
Upper	38	20.0%	51.8%	16.1%	19.6%	57	30.0%	26.7%	31.8%	39.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	52	27.4%	56.0%	13.0%	16.1%
<i>Total</i>	<i>190</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>190</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>					<b>By Revenue</b>				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	5	5.3%	8.1%	4.1%	5.1%					
Moderate	6	6.3%	6.2%	4.4%	4.8%					
Middle	77	81.1%	79.2%	75.2%	73.3%					
Upper	7	7.4%	6.5%	12.7%	16.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.7%	0.6%					
<i>Total</i>	<i>95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
	<b>By Loan Size</b>					<b>By Revenue</b>				
\$1 Million or Less	53	55.8%	34.2%	37.2%	35.2%					
\$100,000 or less	49	51.6%	10.2%	90.2%	25.4%					
\$100,001-\$250,000	23	24.2%	21.6%	4.7%	16.9%					
\$250,001-\$1 Million	23	24.2%	68.2%	5.2%	57.7%					
<i>Total</i>	<i>95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases



**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 48700

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	1	5.6%	4.2%	1.8%	0.9%	1	5.6%	3.4%	5.1%	2.9%
Moderate	1	5.6%	3.4%	4.7%	3.6%	4	22.2%	22.8%	18.9%	14.0%
Middle	15	83.3%	87.0%	87.4%	85.5%	5	27.8%	33.7%	23.8%	21.6%
Upper	1	5.6%	5.4%	6.0%	10.0%	5	27.8%	24.1%	42.4%	53.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	16.7%	15.9%	9.7%	7.9%
<b>Total</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.1%	0.7%	0	0.0%	0.0%	4.6%	2.6%
Moderate	1	2.7%	1.9%	2.0%	1.4%	3	8.1%	6.2%	14.2%	9.9%
Middle	31	83.8%	75.6%	86.4%	83.2%	5	13.5%	13.1%	21.7%	18.0%
Upper	5	13.5%	22.5%	10.5%	14.8%	19	51.4%	61.5%	48.3%	57.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	27.0%	19.3%	11.1%	12.4%
<b>Total</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.7%	1.2%	3	15.0%	7.7%	6.7%	3.3%
Moderate	0	0.0%	0.0%	3.6%	2.5%	6	30.0%	23.9%	18.1%	10.6%
Middle	17	85.0%	80.0%	88.2%	88.4%	7	35.0%	29.7%	24.0%	19.6%
Upper	3	15.0%	20.0%	6.5%	7.8%	4	20.0%	38.7%	45.8%	59.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.5%	7.1%
<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	21.4%	16.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.3%	13.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	64.3%	70.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	1	1.3%	1.3%	1.5%	1.0%	4	5.3%	1.2%	5.1%	2.7%
Moderate	2	2.7%	2.3%	3.2%	2.4%	13	17.3%	11.6%	16.2%	11.3%
Middle	63	84.0%	79.2%	86.9%	84.3%	17	22.7%	19.7%	22.6%	19.2%
Upper	9	12.0%	17.2%	8.5%	12.4%	28	37.3%	49.7%	45.9%	55.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	17.3%	17.8%	10.2%	11.5%
<b>Total</b>	<b>75</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>75</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)		%	% \$(000s)		% \$(000s)
Low	1	3.8%	0.5%	1.4%	1.0%		1.4%	1.0%		1.0%
Moderate	0	0.0%	0.0%	3.3%	4.2%		3.3%	4.2%		4.2%
Middle	23	88.5%	96.1%	81.5%	84.6%		81.5%	84.6%		84.6%
Upper	2	7.7%	3.4%	9.0%	9.2%		9.0%	9.2%		9.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%
Tract Unknown	0	0.0%	0.0%	4.8%	1.0%		4.8%	1.0%		1.0%
<b>Total</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	20	76.9%	66.6%	30.5%	41.2%		30.5%	41.2%		41.2%
<b>By Loan Size</b>										
\$100,000 or less	21	80.8%	46.0%	94.7%	36.7%		94.7%	36.7%		36.7%
\$100,001-\$250,000	4	15.4%	36.2%	2.7%	17.7%		2.7%	17.7%		17.7%
\$250,001-\$1 Million	1	3.8%	17.9%	2.5%	45.6%		2.5%	45.6%		45.6%
<b>Total</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 10900

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	1	1.6%	0.7%	3.4%	1.8%	3	4.7%	2.3%	12.8%	7.2%
Moderate	15	23.4%	18.6%	15.3%	10.1%	6	9.4%	7.9%	24.1%	19.4%
Middle	30	46.9%	43.9%	45.1%	42.1%	7	10.9%	8.4%	23.6%	24.1%
Upper	18	28.1%	36.8%	36.2%	45.9%	7	10.9%	15.5%	28.6%	39.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	41	64.1%	65.8%	10.9%	9.6%
<b>Total</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	5	5.2%	3.3%	1.7%	1.1%	5	5.2%	2.8%	5.7%	3.1%
Moderate	13	13.5%	9.5%	10.6%	7.2%	7	7.3%	4.0%	15.5%	11.0%
Middle	41	42.7%	41.3%	45.4%	41.2%	4	4.2%	3.2%	22.0%	19.2%
Upper	37	38.5%	45.9%	42.3%	50.5%	23	24.0%	30.1%	41.7%	50.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	57	59.4%	59.9%	15.1%	16.1%
<b>Total</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	1	25.0%	4.7%	3.4%	1.4%	2	50.0%	23.3%	11.2%	4.0%
Moderate	0	0.0%	0.0%	16.0%	13.0%	2	50.0%	76.7%	22.9%	15.4%
Middle	3	75.0%	95.3%	51.4%	47.5%	0	0.0%	0.0%	26.9%	22.2%
Upper	0	0.0%	0.0%	29.2%	38.1%	0	0.0%	0.0%	36.6%	55.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.4%	3.1%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	28.8%	7.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	44.8%	33.8%	30.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	55.2%	31.3%	34.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	6.3%	27.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	7	4.2%	1.1%	2.4%	1.5%	10	6.0%	1.2%	8.2%	4.4%
Moderate	29	17.5%	30.5%	12.4%	8.7%	15	9.0%	2.5%	18.5%	13.5%
Middle	75	45.2%	49.5%	45.6%	41.5%	11	6.6%	2.3%	22.7%	20.4%
Upper	55	33.1%	19.0%	39.6%	48.3%	30	18.1%	11.0%	37.2%	46.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	100	60.2%	83.0%	13.4%	15.6%
<b>Total</b>	<b>166</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>166</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)			
Low	3		3.9%		0.3%		5.6%			7.9%
Moderate	16		21.1%		27.6%		17.3%			16.9%
Middle	29		38.2%		29.1%		43.4%			40.8%
Upper	28		36.8%		43.0%		30.9%			33.6%
Unknown	0		0.0%		0.0%		0.0%			0.0%
Tract Unknown	0		0.0%		0.0%		2.8%			0.9%
<b>Total</b>	<b>76</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>			<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	41		53.9%		27.7%		43.2%			38.1%
<b>By Loan Size</b>										
\$100,000 or less	44		57.9%		14.8%		92.2%			34.6%
\$100,001-\$250,000	17		22.4%		20.6%		4.0%			17.4%
\$250,001-\$1 Million	15		19.7%		64.5%		3.8%			48.0%
<b>Total</b>	<b>76</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>			<b>100.0%</b>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 30140

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	11.5%	8.7%	11.1%	6.9%
Moderate	0	0.0%	0.0%	6.5%	3.4%	8	30.8%	27.3%	26.8%	22.7%
Middle	17	65.4%	65.4%	61.3%	57.8%	4	15.4%	20.5%	23.7%	24.3%
Upper	9	34.6%	34.6%	32.2%	38.8%	6	23.1%	27.4%	30.4%	39.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	19.2%	16.1%	8.0%	7.0%
<i>Total</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.6%	1.0%	5.3%	3.0%
Moderate	2	5.1%	4.2%	4.4%	2.5%	5	12.8%	10.2%	17.7%	13.0%
Middle	26	66.7%	61.6%	62.0%	57.9%	12	30.8%	27.3%	25.8%	22.9%
Upper	11	28.2%	34.2%	33.5%	39.6%	12	30.8%	38.1%	36.3%	43.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	23.1%	23.4%	15.0%	17.7%
<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	28.6%	26.1%	8.5%	3.5%
Moderate	1	14.3%	21.7%	4.2%	2.4%	1	14.3%	7.2%	17.2%	12.1%
Middle	6	85.7%	78.3%	66.2%	57.0%	2	28.6%	50.7%	32.9%	33.0%
Upper	0	0.0%	0.0%	29.6%	40.6%	2	28.6%	15.9%	39.3%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.1%	1.8%
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	35.7%	53.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	28.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	14.3%	18.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	6	8.3%	4.4%	7.3%	4.3%
Moderate	3	4.2%	2.6%	5.2%	3.2%	14	19.4%	17.2%	20.4%	16.2%
Middle	49	68.1%	63.3%	62.0%	57.6%	18	25.0%	24.7%	25.5%	23.5%
Upper	20	27.8%	34.1%	32.8%	39.2%	20	27.8%	33.5%	34.6%	41.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	19.4%	20.2%	12.2%	14.2%
<i>Total</i>	<i>72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	2	15.4%	22.4%	18.1%	18.1%	5.4%	5.4%	6.9%	6.9%	4.7%
Middle	6	46.2%	46.2%	38.5%	38.5%	23.0%	23.0%	26.4%	26.4%	26.4%
Upper	5	38.5%	38.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4.7%	4.7%	0.9%	0.9%	0.9%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	4.7%	4.7%	0.9%	0.9%	0.9%
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>By Revenue</b>										
\$1 Million or Less	7	53.8%	12.3%	39.1%	39.1%	39.5%	39.5%	39.5%	39.5%	39.5%
<b>By Loan Size</b>										
\$100,000 or less	7	53.8%	9.0%	93.4%	93.4%	27.1%	27.1%	27.1%	27.1%	27.1%
\$100,001-\$250,000	2	15.4%	12.7%	2.9%	2.9%	15.0%	15.0%	15.0%	15.0%	15.0%
\$250,001-\$1 Million	4	30.8%	78.3%	3.7%	3.7%	57.9%	57.9%	57.9%	57.9%	57.9%
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: PA Non-MSA Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.6%	0.7%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	10.5%	6.9%	14.4%	10.5%
Middle	10	52.6%	56.4%	55.6%	53.7%	1	5.3%	5.7%	24.0%	22.5%
Upper	9	47.4%	43.6%	44.4%	46.3%	5	26.3%	22.5%	44.6%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	57.9%	64.8%	15.3%	16.2%
<b>Total</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.3%	2.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	3.6%	8.9%	6.0%
Middle	13	72.2%	76.5%	50.0%	48.8%	1	5.6%	1.7%	17.5%	14.3%
Upper	5	27.8%	23.5%	50.0%	51.2%	5	27.8%	22.7%	55.7%	60.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	61.1%	72.1%	14.6%	16.6%
<b>Total</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.5%	2.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.3%	9.1%
Middle	1	33.3%	94.0%	48.3%	52.0%	0	0.0%	0.0%	21.3%	16.9%
Upper	2	66.7%	6.0%	51.7%	48.0%	1	33.3%	4.5%	57.4%	69.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	66.7%	95.5%	1.5%	2.6%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	90.9%	97.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	9.1%	2.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	1.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	7.1%	1.4%	10.9%	7.4%
Middle	26	61.9%	91.2%	51.8%	51.9%	2	4.8%	1.0%	19.9%	16.6%
Upper	16	38.1%	8.8%	48.2%	48.1%	11	26.2%	5.7%	51.9%	55.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	26	61.9%	91.9%	14.4%	18.8%
<b>Total</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	0		0.0%		0.0%		0.0%		0.0%	0.0%
Moderate	0		0.0%		0.0%		0.0%		0.0%	0.0%
Middle	2		40.0%		33.3%		44.8%		48.9%	
Upper	3		60.0%		66.7%		37.7%		45.9%	
Unknown	0		0.0%		0.0%		0.0%		0.0%	0.0%
Tract Unknown	0		0.0%		0.0%		17.5%		5.3%	
<b>Total</b>	<b>5</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	
	<b>By Revenue</b>									
\$1 Million or Less	3		60.0%		40.6%		40.1%		43.5%	
	<b>By Loan Size</b>									
\$100,000 or less	3		60.0%		19.1%		96.5%		49.8%	
\$100,001-\$250,000	0		0.0%		0.0%		1.8%		13.0%	
\$250,001-\$1 Million	2		40.0%		80.9%		1.7%		37.2%	
<b>Total</b>	<b>5</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: PA Non-MSA Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	6	4.3%	2.3%	4.9%	2.8%
Moderate	5	3.6%	3.4%	3.0%	2.6%	24	17.1%	13.2%	21.8%	17.0%
Middle	59	42.1%	37.1%	48.5%	43.2%	32	22.9%	20.1%	26.7%	25.9%
Upper	76	54.3%	59.5%	48.5%	54.2%	61	43.6%	51.8%	34.1%	42.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	12.1%	12.6%	12.4%	12.1%
<i>Total</i>	<i>140</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>140</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	2.0%	0.9%	3.2%	1.7%
Moderate	8	3.3%	2.5%	1.6%	1.4%	33	13.5%	7.7%	12.7%	8.5%
Middle	135	55.3%	54.1%	47.0%	42.8%	49	20.1%	15.0%	20.6%	17.0%
Upper	101	41.4%	43.3%	51.4%	55.8%	101	41.4%	45.5%	45.4%	51.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	56	23.0%	30.9%	18.2%	21.1%
<i>Total</i>	<i>244</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>244</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	14	25.5%	14.9%	9.0%	3.7%
Moderate	3	5.5%	2.3%	3.6%	3.3%	12	21.8%	9.9%	18.8%	12.7%
Middle	32	58.2%	72.2%	60.2%	54.9%	11	20.0%	13.6%	24.9%	23.2%
Upper	20	36.4%	25.5%	36.2%	41.8%	17	30.9%	25.6%	44.2%	54.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.8%	36.0%	3.1%	5.9%
<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.3%	13.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	66.7%	73.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	19.0%	12.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	25	5.7%	1.5%	4.0%	2.0%
Moderate	16	3.6%	2.8%	2.1%	1.9%	69	15.7%	9.6%	15.7%	11.1%
Middle	226	51.5%	48.4%	48.3%	43.4%	92	21.0%	16.7%	22.6%	19.7%
Upper	197	44.9%	48.7%	49.6%	54.6%	179	40.8%	47.5%	41.9%	48.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	74	16.9%	24.7%	15.7%	18.7%
<i>Total</i>	<i>439</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>439</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	8	5.9%	5.0%		3.0%	3.5%				
Middle	71	52.2%	50.6%		52.6%	50.6%				
Upper	57	41.9%	44.5%		41.3%	45.2%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		3.1%	0.7%				
<i>Total</i>	<i>136</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>				
<b>By Revenue</b>										
\$1 Million or Less	66	48.5%	26.5%		35.2%	41.1%				
<b>By Loan Size</b>										
\$100,000 or less	85	62.5%	17.8%		91.2%	30.5%				
\$100,001-\$250,000	21	15.4%	16.9%		4.8%	20.7%				
\$250,001-\$1 Million	30	22.1%	65.3%		4.0%	48.7%				
<i>Total</i>	<i>136</i>	<i>100.0%</i>	<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>				

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: PA Non-MSA Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	13.3%	5.3%	10.3%	6.2%
Moderate	4	26.7%	12.1%	12.1%	9.7%	3	20.0%	7.8%	31.2%	25.1%
Middle	10	66.7%	74.2%	76.6%	76.0%	1	6.7%	9.6%	22.4%	21.1%
Upper	1	6.7%	13.7%	11.2%	14.3%	1	6.7%	10.3%	28.4%	39.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	53.3%	66.9%	7.7%	8.0%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.3%	3.8%	5.6%	2.9%
Moderate	1	5.3%	3.0%	14.5%	11.8%	6	31.6%	21.8%	14.7%	9.8%
Middle	17	89.5%	85.9%	75.1%	73.1%	4	21.1%	17.3%	24.4%	20.6%
Upper	1	5.3%	11.1%	10.4%	15.1%	6	31.6%	47.8%	45.5%	54.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	10.5%	9.3%	9.9%	12.2%
<i>Total</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	7	25.9%	19.9%	8.8%	2.9%
Moderate	2	7.4%	3.7%	16.2%	16.6%	5	18.5%	19.3%	17.0%	11.8%
Middle	25	92.6%	96.3%	78.8%	79.4%	6	22.2%	24.2%	29.3%	23.1%
Upper	0	0.0%	0.0%	5.1%	4.0%	9	33.3%	36.6%	39.7%	53.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.2%	9.0%
<i>Total</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.1%	1.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	88.9%	98.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	10	16.4%	5.0%	7.6%	4.1%
Moderate	7	11.5%	7.0%	14.1%	11.3%	14	23.0%	15.5%	20.3%	15.4%
Middle	52	85.2%	81.1%	76.3%	75.0%	11	18.0%	14.2%	24.6%	20.8%
Upper	2	3.3%	11.9%	9.6%	13.7%	16	26.2%	30.8%	38.9%	48.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	16.4%	34.5%	8.6%	11.3%
<i>Total</i>	<i>61</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>61</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0		0.0%		0.0%		0.0%		0.0%	
Moderate	1		3.6%		1.5%		15.3%		18.0%	
Middle	27		96.4%		98.5%		72.3%		75.0%	
Upper	0		0.0%		0.0%		4.2%		6.0%	
Unknown	0		0.0%		0.0%		0.0%		0.0%	
Tract Unknown	0		0.0%		0.0%		8.2%		1.0%	
<i>Total</i>	<i>28</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	
<b>By Revenue</b>										
\$1 Million or Less	<i>11</i>		<i>39.3%</i>		<i>10.9%</i>		<i>38.8%</i>		<i>39.6%</i>	
<b>By Loan Size</b>										
\$100,000 or less	<i>14</i>		<i>50.0%</i>		<i>10.1%</i>		<i>89.4%</i>		<i>30.9%</i>	
\$100,001-\$250,000	<i>7</i>		<i>25.0%</i>		<i>19.0%</i>		<i>6.4%</i>		<i>22.6%</i>	
\$250,001-\$1 Million	<i>7</i>		<i>25.0%</i>		<i>70.9%</i>		<i>4.2%</i>		<i>46.5%</i>	
<i>Total</i>	<i>28</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: DE Non-MSA Group

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	4	4.8%	2.5%	5.2%	2.5%
Moderate	4	4.8%	2.1%	6.8%	4.5%	8	9.6%	5.2%	11.9%	7.6%
Middle	51	61.4%	47.1%	70.7%	63.7%	9	10.8%	6.7%	16.3%	13.2%
Upper	28	33.7%	50.9%	22.4%	31.8%	41	49.4%	66.1%	54.6%	66.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	25.3%	19.5%	12.0%	10.1%
<b>Total</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	10	6.4%	2.8%	3.7%	1.9%
Moderate	11	7.0%	4.4%	5.1%	3.5%	22	14.0%	6.0%	9.3%	5.7%
Middle	108	68.8%	48.8%	66.1%	59.3%	27	17.2%	9.0%	15.7%	11.9%
Upper	38	24.2%	46.7%	28.8%	37.2%	69	43.9%	67.7%	56.7%	66.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	29	18.5%	14.5%	14.7%	14.3%
<b>Total</b>	<b>157</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>157</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	12	25.5%	16.1%	10.5%	2.3%
Moderate	9	19.1%	13.1%	9.4%	2.5%	12	25.5%	13.9%	21.3%	8.0%
Middle	32	68.1%	77.2%	69.3%	38.7%	18	38.3%	58.1%	24.6%	11.1%
Upper	6	12.8%	9.7%	21.3%	58.9%	5	10.6%	11.9%	38.9%	45.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.7%	33.5%
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	26	9.1%	2.8%	4.4%	2.1%
Moderate	24	8.4%	3.7%	5.8%	3.8%	42	14.6%	5.8%	10.6%	6.4%
Middle	191	66.6%	48.4%	67.9%	60.5%	54	18.8%	8.5%	16.1%	12.3%
Upper	72	25.1%	47.9%	26.3%	35.7%	115	40.1%	66.9%	55.5%	65.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	50	17.4%	16.0%	13.5%	13.2%
<b>Total</b>	<b>287</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>287</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0		0.0%		0.0%		0.0%		0.0%	0.0%
Moderate	25		25.5%		19.4%		10.4%		10.4%	10.4%
Middle	52		53.1%		49.9%		62.0%		63.1%	63.1%
Upper	21		21.4%		30.6%		20.2%		23.5%	23.5%
Unknown	0		0.0%		0.0%		0.0%		0.0%	0.0%
Tract Unknown	0		0.0%		0.0%		7.4%		3.0%	3.0%
<b>Total</b>	<b>98</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	57		58.2%		32.6%		39.3%		45.2%	45.2%
<b>By Loan Size</b>										
\$100,000 or less	63		64.3%		18.4%		96.0%		47.5%	47.5%
\$100,001-\$250,000	20		20.4%		27.6%		2.2%		17.0%	17.0%
\$250,001-\$1 Million	15		15.3%		54.0%		1.8%		35.5%	35.5%
<b>Total</b>	<b>98</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 20100

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	8.1%	2.6%	7.3%	4.2%
Moderate	3	8.1%	9.5%	6.2%	5.1%	7	18.9%	11.7%	27.5%	23.3%
Middle	29	78.4%	81.5%	80.9%	80.7%	4	10.8%	5.3%	26.1%	28.7%
Upper	5	13.5%	9.0%	12.9%	14.2%	10	27.0%	34.9%	22.3%	29.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	35.1%	45.5%	16.8%	14.8%
<b>Total</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	7	10.8%	7.7%	4.7%	2.8%
Moderate	4	6.2%	3.6%	7.2%	6.0%	12	18.5%	12.8%	12.3%	8.9%
Middle	48	73.8%	74.4%	73.8%	74.3%	8	12.3%	7.6%	17.9%	15.9%
Upper	13	20.0%	22.0%	19.0%	19.7%	13	20.0%	23.7%	33.0%	36.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	38.5%	48.3%	32.1%	36.5%
<b>Total</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	6	18.8%	10.3%	9.5%	3.7%
Moderate	2	6.3%	6.4%	11.0%	12.8%	4	12.5%	9.7%	20.5%	13.7%
Middle	27	84.4%	88.3%	71.9%	69.9%	12	37.5%	29.7%	30.8%	31.5%
Upper	3	9.4%	5.3%	17.1%	17.4%	8	25.0%	28.1%	33.8%	40.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	6.3%	22.2%	5.3%	11.0%
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.3%	2.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	85.7%	97.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	16	11.9%	5.9%	5.9%	3.2%
Moderate	9	6.7%	5.8%	6.9%	5.6%	23	17.2%	12.3%	18.3%	13.8%
Middle	104	77.6%	77.3%	76.4%	77.4%	24	17.9%	7.2%	21.4%	20.1%
Upper	21	15.7%	16.9%	16.7%	17.0%	31	23.1%	27.9%	29.0%	32.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	29.9%	46.7%	25.5%	30.7%
<b>Total</b>	<b>134</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>134</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)		%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Moderate	7	21.2%	21.2%	19.0%	19.0%		18.4%	18.4%	26.9%	26.9%
Middle	19	57.6%	57.6%	50.3%	50.3%		63.8%	63.8%	57.1%	57.1%
Upper	7	21.2%	21.2%	30.7%	30.7%		14.3%	14.3%	14.9%	14.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%		3.5%	3.5%	1.1%	1.1%
<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	18	54.5%	54.5%	33.9%	33.9%		37.1%	37.1%	41.1%	41.1%
<b>By Loan Size</b>										
\$100,000 or less	14	42.4%	42.4%	10.6%	10.6%		95.8%	95.8%	43.7%	43.7%
\$100,001-\$250,000	11	33.3%	33.3%	24.0%	24.0%		2.3%	2.3%	16.4%	16.4%
\$250,001-\$1 Million	8	24.2%	24.2%	65.3%	65.3%		1.8%	1.8%	39.9%	39.9%
<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases



**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 40060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	7	12.3%	6.1%	3.3%	1.6%	7	12.3%	7.0%	12.9%	6.6%
Moderate	10	17.5%	10.9%	16.9%	10.4%	10	17.5%	14.5%	22.1%	16.0%
Middle	9	15.8%	14.2%	29.9%	25.6%	9	15.8%	13.3%	20.0%	19.8%
Upper	31	54.4%	68.8%	50.0%	62.5%	18	31.6%	43.8%	32.4%	46.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	22.8%	21.4%	12.6%	11.5%
<b>Total</b>	<b>57</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>57</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	2	3.6%	1.4%	2.1%	1.1%	1	1.8%	1.0%	5.5%	3.0%
Moderate	7	12.7%	9.3%	11.8%	7.9%	5	9.1%	7.6%	14.4%	10.0%
Middle	19	34.5%	33.8%	27.5%	23.6%	6	10.9%	13.4%	19.1%	16.3%
Upper	27	49.1%	55.4%	58.7%	67.3%	4	7.3%	6.8%	42.9%	52.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	39	70.9%	71.2%	18.0%	18.4%
<b>Total</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	5.5%	3.4%	0	0.0%	0.0%	13.8%	4.3%
Moderate	0	0.0%	0.0%	18.8%	7.6%	0	0.0%	0.0%	22.8%	13.4%
Middle	2	66.7%	97.7%	33.1%	27.2%	0	0.0%	0.0%	24.6%	19.2%
Upper	1	33.3%	2.3%	42.5%	61.7%	2	66.7%	4.6%	33.5%	56.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	95.4%	5.4%	6.8%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	13.0%	18.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	16.7%	8.1%	21.7%	21.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	50.0%	49.3%	39.1%	33.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	33.3%	42.6%	26.1%	27.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	9	7.4%	1.1%	2.6%	2.3%	8	6.6%	1.1%	8.1%	4.0%
Moderate	18	14.9%	8.6%	13.7%	9.5%	15	12.4%	3.1%	17.2%	11.3%
Middle	33	27.3%	42.4%	28.4%	24.9%	15	12.4%	3.7%	19.5%	16.5%
Upper	61	50.4%	47.9%	55.3%	63.3%	24	19.8%	7.3%	39.1%	47.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	59	48.8%	84.7%	16.1%	21.1%
<b>Total</b>	<b>121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	1	2.9%	1.9%		6.8%	10.7%				
Moderate	5	14.7%	21.4%		18.7%	20.8%				
Middle	9	26.5%	18.7%		28.7%	28.0%				
Upper	19	55.9%	58.0%		41.5%	39.4%				
Unknown	0	0.0%	0.0%		0.1%	0.2%				
Tract Unknown	0	0.0%	0.0%		4.2%	0.9%				
<b>Total</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	20	58.8%	27.5%		36.5%	32.0%				
<b>By Loan Size</b>										
\$100,000 or less	24	70.6%	25.7%		89.9%	23.8%				
\$100,001-\$250,000	4	11.8%	17.2%		4.4%	15.6%				
\$250,001-\$1 Million	6	17.6%	57.1%		5.7%	60.5%				
<b>Total</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD 48424

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	1.0%	0.6%	0	0.0%	0.0%	7.1%	2.7%
Moderate	2	7.4%	4.3%	13.5%	7.3%	0	0.0%	0.0%	16.0%	8.7%
Middle	8	29.6%	26.0%	36.4%	28.9%	0	0.0%	0.0%	18.3%	13.6%
Upper	17	63.0%	69.7%	49.2%	63.2%	4	14.8%	27.3%	47.9%	65.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	85.2%	72.7%	10.7%	9.9%
<b>Total</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	1	1.3%	2.2%	0.8%	0.7%	0	0.0%	0.0%	6.4%	3.5%
Moderate	11	14.3%	11.0%	10.6%	6.7%	0	0.0%	0.0%	10.8%	6.4%
Middle	26	33.8%	30.2%	33.9%	27.9%	0	0.0%	0.0%	16.5%	11.9%
Upper	39	50.6%	56.6%	54.7%	64.7%	5	6.5%	15.9%	54.7%	66.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	72	93.5%	84.1%	11.6%	11.8%
<b>Total</b>	<b>77</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>77</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	2.4%	0.3%	0	0.0%	0.0%	8.9%	1.1%
Moderate	0	0.0%	0.0%	16.9%	6.4%	0	0.0%	0.0%	15.9%	4.6%
Middle	0	0.0%	0.0%	31.8%	21.4%	0	0.0%	0.0%	22.9%	13.0%
Upper	0	0.0%	0.0%	49.0%	71.9%	0	0.0%	0.0%	49.4%	78.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	2.5%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	4.0%	2.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	38.0%	13.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	30.0%	23.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	28.0%	60.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	1	1.0%	1.6%	0.9%	0.7%	0	0.0%	0.0%	6.7%	3.1%
Moderate	13	12.5%	9.3%	11.8%	7.1%	0	0.0%	0.0%	12.9%	7.1%
Middle	34	32.7%	29.2%	34.8%	28.1%	0	0.0%	0.0%	17.3%	12.2%
Upper	56	53.8%	59.9%	52.4%	64.0%	9	8.7%	18.7%	51.9%	63.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	95	91.3%	81.3%	11.2%	13.8%
<b>Total</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)					
Low	0	0.0%	0.0%			3.6%		4.5%		
Moderate	0	0.0%	0.0%			16.6%		20.2%		
Middle	1	100.0%	100.0%			30.2%		31.7%		
Upper	0	0.0%	0.0%			47.8%		42.1%		
Unknown	0	0.0%	0.0%			0.2%		0.5%		
Tract Unknown	0	0.0%	0.0%			1.6%		0.9%		
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>			<b>100.0%</b>		<b>100.0%</b>		
<b>By Revenue</b>										
\$1 Million or Less	0	0.0%	0.0%			42.0%		30.3%		
<b>By Loan Size</b>										
\$100,000 or less	0	0.0%	0.0%			96.0%		43.4%		
\$100,001-\$250,000	0	0.0%	0.0%			2.0%		13.6%		
\$250,001-\$1 Million	1	100.0%	100.0%			2.0%		43.0%		
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>			<b>100.0%</b>		<b>100.0%</b>		

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MD 14484

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	4	9.3%	12.8%	5.5%	5.0%	0	0.0%	0.0%	4.7%	2.1%
Moderate	6	14.0%	13.7%	12.7%	9.8%	1	2.3%	1.6%	18.9%	11.9%
Middle	18	41.9%	32.5%	35.3%	28.3%	4	9.3%	11.7%	21.5%	17.6%
Upper	15	34.9%	41.0%	46.4%	56.9%	8	18.6%	29.9%	43.0%	55.4%
Unknown	0	0.0%	0.0%	0.1%	0.0%	30	69.8%	56.8%	11.9%	12.9%
<b>Total</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	5	7.8%	6.1%	3.5%	3.2%	0	0.0%	0.0%	2.8%	1.5%
Moderate	12	18.8%	14.8%	9.1%	7.5%	3	4.7%	2.6%	11.2%	7.6%
Middle	27	42.2%	34.2%	32.5%	27.4%	4	6.3%	5.0%	22.0%	18.6%
Upper	20	31.3%	44.9%	54.9%	61.9%	8	12.5%	15.9%	50.7%	59.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	49	76.6%	76.6%	13.2%	13.3%
<b>Total</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	3.3%	3.0%	0	0.0%	0.0%	5.9%	2.7%
Moderate	0	0.0%	0.0%	10.6%	7.4%	0	0.0%	0.0%	16.5%	9.4%
Middle	1	100.0%	100.0%	34.5%	25.8%	0	0.0%	0.0%	25.6%	19.0%
Upper	0	0.0%	0.0%	51.6%	63.8%	0	0.0%	0.0%	47.6%	61.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	4.5%	7.1%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	16.2%	8.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	75.0%	80.3%	30.4%	24.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	25.0%	19.7%	28.1%	28.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.3%	39.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	9	8.0%	5.3%	4.0%	3.8%	0	0.0%	0.0%	3.3%	1.6%
Moderate	21	18.8%	39.4%	10.0%	8.7%	4	3.6%	1.3%	13.1%	8.4%
Middle	47	42.0%	28.6%	33.2%	27.6%	8	7.1%	4.7%	21.9%	17.7%
Upper	35	31.3%	26.7%	52.8%	59.9%	16	14.3%	13.1%	48.7%	56.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	84	75.0%	80.9%	13.0%	16.2%
<b>Total</b>	<b>112</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>112</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	0	0.0%	0.0%	0.0%	0.0%	7.0%	6.9%			
Moderate	0	0.0%	0.0%	0.0%	0.0%	11.7%	10.7%			
Middle	2	9.5%	9.3%	9.3%	9.3%	31.8%	30.4%			
Upper	19	90.5%	90.7%	90.7%	90.7%	46.9%	50.0%			
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.7%	1.3%			
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	2.0%	0.6%			
<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>			
<b>By Revenue</b>										
\$1 Million or Less	1	4.8%	0.6%	38.4%	32.1%					
<b>By Loan Size</b>										
\$100,000 or less	1	4.8%	0.6%	93.5%	29.2%					
\$100,001-\$250,000	0	0.0%	0.0%	2.9%	14.6%					
\$250,001-\$1 Million	20	95.2%	99.4%	3.6%	56.2%					
<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>			

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 14860

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	6	7.1%	3.4%	4.8%	1.9%	4	4.7%	2.2%	8.8%	3.0%
Moderate	15	17.6%	11.8%	14.1%	7.0%	4	4.7%	2.8%	19.4%	10.0%
Middle	37	43.5%	34.0%	39.5%	26.8%	8	9.4%	8.0%	19.0%	13.5%
Upper	27	31.8%	50.8%	41.6%	64.4%	18	21.2%	35.9%	41.5%	62.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	51	60.0%	51.1%	11.3%	10.9%
<b>Total</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	2	2.7%	2.0%	1.9%	0.9%	1	1.4%	0.3%	5.7%	2.3%
Moderate	17	23.3%	14.1%	9.6%	5.4%	5	6.8%	4.6%	13.2%	6.9%
Middle	29	39.7%	28.5%	37.0%	25.2%	2	2.7%	2.1%	19.5%	13.3%
Upper	25	34.2%	55.5%	51.5%	68.5%	25	34.2%	53.7%	51.5%	67.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	54.8%	39.2%	10.2%	9.7%
<b>Total</b>	<b>73</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>73</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	2.3%	0.4%	0	0.0%	0.0%	8.3%	1.9%
Moderate	0	0.0%	0.0%	8.5%	3.7%	0	0.0%	0.0%	15.4%	5.6%
Middle	1	50.0%	35.4%	38.4%	20.4%	0	0.0%	0.0%	18.6%	10.3%
Upper	1	50.0%	64.6%	50.8%	75.5%	2	100.0%	100.0%	50.8%	72.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.9%	10.1%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	40.0%	15.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	61.5%	37.3%	45.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	38.5%	14.7%	17.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	8.0%	21.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	8	4.9%	1.9%	2.6%	1.3%	5	3.1%	0.9%	6.5%	2.5%
Moderate	33	20.4%	26.8%	10.8%	6.2%	9	5.6%	2.6%	14.7%	7.6%
Middle	68	42.0%	33.4%	37.6%	25.4%	10	6.2%	3.6%	19.3%	13.1%
Upper	53	32.7%	37.8%	49.0%	67.0%	45	27.8%	32.3%	48.9%	65.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	93	57.4%	60.6%	10.5%	11.0%
<b>Total</b>	<b>162</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>162</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		8.3%	11.3%				
Moderate	1	12.5%	1.4%		15.5%	19.5%				
Middle	6	75.0%	86.5%		32.1%	32.3%				
Upper	1	12.5%	12.2%		42.2%	36.2%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		1.9%	0.8%				
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	1	12.5%	1.4%		40.2%	30.2%				
<b>By Loan Size</b>										
\$100,000 or less	1	12.5%	1.4%		94.9%	39.3%				
\$100,001-\$250,000	2	25.0%	10.8%		2.7%	15.7%				
\$250,001-\$1 Million	5	62.5%	87.8%		2.4%	45.0%				
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases