



PUBLIC DISCLOSURE

Date of Evaluation: JULY 20, 2009

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Name of Depository Institution: WILMINGTON TRUST COMPANY

Institution's Identification Number: 272218

Address: 1100 N. MARKET STREET

WILMINGTON, DELAWARE

**FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL
PHILADELPHIA, PENNSYLVANIA 19106**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of the entire community, including low- and moderate-income neighborhoods, consistent with the 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 does not represent an analysis, conclusion or opinion of the Federal Reserve Bank of Philadelphia concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING

Wilmington Trust Company is rated **OUTSTANDING**.

TABLE OF PERFORMANCE TEST RATINGS

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

PERFORMANCE TEST MATRIX			
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*Note: The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

Major factors supporting the institution's rating include the following:

- A substantial majority of the bank's loans were made inside its assessment area;
- The geographic distribution of loans reflects excellent penetration throughout the assessment area;
- The distribution of borrowers, given the product lines offered by the bank, reflects excellent penetration among borrowers of different income levels and good penetration among business customers of different sizes;
- The bank makes a relatively high level of community development loans;
- The bank exhibits a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and very small businesses, consistent with safe and sound banking practices;
- The bank has a significant level of qualified community development investments and grants, occasionally in a leadership position; and
- The bank is a leader in providing community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Wilmington Trust Company (Wilmington Trust), headquartered in Wilmington, New Castle County, Delaware, is a state chartered full-service commercial bank. Wilmington Trust operates 48 branches throughout New Castle, Kent and Sussex Counties in Delaware, offering a variety of consumer and commercial banking services. Wilmington Trust is also one of the largest personal trust administrators in the United States. The following table details the locations of the bank's branches.

Metropolitan Area	County	Number of Branches
Wilmington Metropolitan Division	New Castle County	24
Dover Metropolitan Statistical Area	Kent County	8
Sussex County Non-Metropolitan Area	Sussex County	16
Total Branches		48

Wilmington Trust is a subsidiary of Wilmington Trust Corporation (WTC), a financial holding company with assets of \$11.4 billion as of June 30, 2009. Wilmington Trust is WTC's largest subsidiary, representing approximately 85% of the holding company's assets.

As of June 30, 2009, Wilmington Trust reported total assets of \$9.7 billion, of which \$8.3 billion, or 85%, were loans. On a dollar volume basis, commercial loans, which include commercial mortgages and commercial and industrial loans, are the most material product offered by the bank. The second most significant product is loans secured by residential property. Collectively these loan types represent approximately 60% of the total loan portfolio.

The composition of the bank's loan portfolio is presented in the following table:

LOANS as of 06/30/2009	\$	%
Real Estate Secured		
Construction & Land Development	1,889,921	22.7%
Secured by Farmland	45,832	0.6%
Secured by Residential Property (Open-End)	426,130	5.1%
Secured by Residential Property (Closed-End)	649,147	7.8%
Multi-Family Property	75,635	0.9%
Commercial Mortgages	2,306,741	27.7%
Commercial and Industrial	1,470,077	17.7%
Loans to Depository Institutions	300,000	3.6%
Other Loans to Farmers	37,458	0.5%
Consumer Loans	968,055	11.6%
Obligations of States and Political Subdivisions	23,556	.03%
Other Loans	129,528	1.6%
GROSS LOANS	\$8,322,080	100%

Source: Consolidated Report of the period ending June 30, 2009 (Schedule RC-C).

DESCRIPTION OF ASSESSMENT AREA

For purposes of CRA, Wilmington Trust has three assessment areas which encompass the entire state of Delaware¹:

1. Wilmington metropolitan division (Wilmington MD), consisting of New Castle County in the Delaware portion of the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metropolitan Statistical Area (MSA).
2. Sussex County, Delaware, a non-metropolitan area.
3. Dover MSA, consisting of Kent County, Delaware.

The bank's assessment areas were determined to comply with the requirements of the Community Reinvestment Act and do not arbitrarily exclude low- or moderate-income census tracts.

SCOPE OF EXAMINATION

Wilmington Trust's performance under the Community Reinvestment Act (CRA) was evaluated for the period from May 8, 2007, through July 20, 2009. The lending, investment, and service tests were applied in assessing the bank's performance under CRA pursuant to the Interagency Procedures and Guidelines for Large Retail Institutions. Under the lending test, loan products evaluated include home-purchase and home-improvement loans and refinancing of such loans (collectively titled Home Mortgage Disclosure Act (HMDA) loans), small business loans, small farm loans, and other loans that qualified as community development. The HMDA, small business and small farm lending activity covers data reported from January 1, 2007 through December 31, 2008.

Wilmington Trust's HMDA, small business and small farm loans were compared to the aggregate of all lenders in the bank's assessment areas reporting loans pursuant to HMDA, and small business and small farm loans pursuant to CRA. This data is reported annually, and the most recent year for which information is available is 2008.

For purposes of evaluating the geographic distribution of loans, census tracts are classified on the basis of 2000 U.S. Census data. The distribution of loans to borrowers of different income levels is based upon annually adjusted median family income data made available by the U.S. Department of Housing and Urban Development (HUD). The most recent year for which median family income data is available is 2008. All other demographic indices and statistics presented throughout this evaluation are based on 2000 U.S. Census data unless otherwise noted.

Each of the bank's assessment areas were evaluated for lending, investment, and service performance using the full review examination procedures; however, a substantial majority of the bank's lending and operations are in the Wilmington assessment area and, as such, this assessment area received the greatest weight when rating the bank's CRA performance.

¹ A map of the bank's assessment areas is located in Appendix C of this Public Evaluation.

Written documentation of interviews conducted with bankers, community organizations, and local government officials, prepared by the Federal Reserve and other regulatory agencies, was reviewed during the course of the evaluation. When asked about credit needs and opportunities in the assessment area, community leaders indicated the following: (1) loans for small businesses, (2) affordable housing for low- and moderate-income people in the Wilmington metropolitan area and affordable housing for senior citizens in Sussex County; and (3) affordable small dollar loans as an alternative to pay day loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Assessment Area Concentration

An analysis of the bank’s HMDA, small business, and small farm lending was performed to determine the volume of loans extended inside and outside of the bank’s assessment areas. As the following table illustrates, a substantial majority of the bank’s loans were made inside its assessment areas.

Wilmington Trust Company Lending Inside and Outside the Assessment Area								
	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	947	93.2	33,609	92.5	69	6.8	2,725	7.5
Home Purchase – Conventional	839	98.2	163,158	97.3	15	1.8	4,585	2.7
Home Purchase – FHA	77	95.1	14,249	94.8	4	4.9	780	5.2
Multi-Family Housing	8	100.0	3,836	100.0	0	0.0	0	0.0
Refinancing	933	97.3	160,236	97.0	26	2.7	4,881	3.0
Total HMDA Loans	2,804	96.1	375,088	96.7	114	3.9	12,971	3.3
Total Small Business Loans	1,816	91.0	297,348	91.8	180	9.0	26,527	8.2
Total Small Farm Loans	26	92.9	3,411	93.0	2	7.1	257	7.0
TOTAL LOANS	4,662	94.0	\$689,742	94.6	296	6.0	\$39,755	5.4

Geographic Distribution of Lending and Borrower Characteristics

The geographic distribution of loans reflects excellent penetration throughout the bank’s assessment areas. The overall distribution of loans among borrowers of different income levels, especially low- and moderate-income families, also shows excellent penetration given the economics and demographics of the assessment areas. The distribution of loans among businesses of different sizes, including small businesses, reflects good penetration.

Wilmington Trust’s participation in innovative and flexible lending programs which address the specific credit needs of low- and moderate-income borrowers and small businesses in its assessment areas enhances its home mortgage and small business lending profiles.

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the bank's Consolidated Reports of Condition and Income (as of June 30, 2009) indicates that 24% of Wilmington Trust's commercial loans were designated as small business loans, as detailed in the following chart.

WILMINGTON TRUST COMPANY SMALL BUSINESS LENDING		
	AMOUNT OUTSTANDING AS OF 06/30/2009 (\$000)	PERCENT
Loans with original amounts of \$100,000 or less	252,174	7
Loans with original amounts of more than \$100,000 through \$250,000	115,937	3
Loans with original amounts of more than \$250,000 through \$1,000,000	544,415	14
TOTAL SMALL BUSINESS LOANS	912,526	24
Loans with original amounts of more than \$1,000,000	2,864,292	76
TOTAL COMMERCIAL LOANS	\$3,776,818	100

The Consolidated Reports of Condition and Income also shows that 14% of the bank's farm-related loans are designated as small farm loans, as detailed in the following chart.

WILMINGTON TRUST COMPANY FARM LENDING		
	AMOUNT OUTSTANDING AS OF 06/30/2008 (\$000)	PERCENT
Loans with original amounts of \$100,000 or less	811	1
Loans with original amounts of more than \$100,000 through \$250,000	4,806	6
Loans with original amounts of more than \$250,000 through \$500,000	5,928	7
TOTAL SMALL FARM LOANS	11,545	14
Loans with original amounts of more than \$500,000	71,745	86
TOTAL FARM LOANS	\$83,290	100

Community Development Loans

Wilmington Trust made a significant number of community development loans in its assessment areas. During the time period evaluated, the bank originated nine community development loans totaling \$16.3 million to finance community development initiatives. Seven loans totaling \$12.6 million supported affordable housing, one loan for \$3.7 million supported economic development, and one loan for \$84 thousand supported the provision of community development services.

INVESTMENT TEST

Wilmington Trust has a significant level of qualified community development investments and grants throughout its assessment areas. Investments, totaling \$24.7 million, primarily support affordable housing initiatives in the bank's assessment areas. Of the total investments, 82% support affordable housing, 17% support economic development and the remaining 1% support the provision of community development services.

Qualified investments were distributed across the bank's three assessment areas. In the Wilmington MD, investments total \$11.7 million, or 47% of Wilmington Trust's total investments. In the Sussex County assessment area, qualified investments total \$6.4 million, or 26% of total investments. In the Dover MSA, investments total \$6.6 million, or 27% of total investments.

SERVICE TEST

Branch delivery systems, as well as alternative delivery systems such as automated teller machines (ATMs), telephone and Internet banking, are accessible to essentially all portions of the bank's assessment areas. Banking services do not vary in a way that inconveniences certain portions of the bank's assessment areas, particularly low- and moderate-income census tracts or low- or moderate-income individuals.

Wilmington Trust is a leader in providing community development services. Bank officers and employees serve in various capacities on boards and committees and provide technical expertise to numerous community development organizations across the assessment areas. In addition, the bank provides deposit accounts that provide greater access to banking services for low- and moderate-income individuals and small businesses.

ASSESSMENT AREA CONCLUSIONS

WILMINGTON, DELAWARE METROPOLITAN DIVISION

DESCRIPTION OF ASSESSMENT AREA

For purposes of this CRA evaluation, Wilmington Trust has designated the Wilmington MD as an assessment area. The Wilmington MD encompasses all of New Castle County in northern Delaware and is part of the Philadelphia-Camden-Wilmington MSA. The Wilmington MD has 127 census tracts, 10 of which are low-income and 23 moderate-income. All of the low-income tracts and eight of the moderate-income tracts are located in the city of Wilmington, the largest urban center within this assessment area. The city contains 15% of the total assessment area population.

Wilmington Trust's performance was evaluated in terms of the demographic and business context in which it operates. According to the Federal Deposit Insurance Corporation's (FDIC's) Summary of Deposits, as of June 30, 2008, 32 depository institutions operate in the Wilmington MD. These institutions maintain a total of 169 branches holding \$148 billion in deposits. Wilmington Trust, with 23 branches in the market, ranked 5th, with \$6.4 billion, or 4% of the retail deposit market. The Wilmington MD assessment area branches hold approximately 83% of Wilmington Trust's total deposits.

The Wilmington MD deposit market is dominated by large super-regional banks. ING Bank, FSB, is ranked 1st, holding 46% of the deposit market as of June 30, 2008. Chase Bank USA ranked 2nd, with 24% of the market. Combined, these two banks hold over 70% of market deposits.

Wilmington Trust's home mortgage lending was compared to the aggregate of all lenders in the market reporting HMDA loans. These data are reported annually, and 2008 is the most recent year for which information was available. The bank ranks 7th with a market share of 3%, in a market with 341 HMDA reporters. No single financial institution dominates the market. Countrywide Bank FSB ranked 1st with 13% of the market.

Among small business lenders, Wilmington Trust ranked 8th in the Wilmington MD with 3% of the market. American Express Bank FSB ranked 1st with 28% of the market, including small business corporate credit cards. In 2008, the assessment area had a total of 84 small business reporters.

ECONOMIC CHARACTERISTICS

Wilmington, with a population of almost 73 thousand, is the largest city in Delaware. Much of Wilmington's economy is based on its status as the most populous and readily accessible city in Delaware, a state that made itself attractive to businesses with pro-business finance laws. Wilmington has become a national financial center for the credit card industry, partially due to the Financial Center Development Act of 1981 which eliminated the usury laws enacted by most states, thereby removing the cap on interest rates that banks may legally charge customers.

Many major credit card issuers, including Bank of America and Chase Card Services, are headquartered in Wilmington. Also, the Dutch banking giant ING Group N.V, headquartered its U.S. Internet banking unit, ING Direct, in Wilmington.

Wilmington is also a center for retail banking, housing the Delaware headquarters of Wilmington Trust, PNC Bank Delaware, Chase Bank USA, Citizens Bank, TD Bank NA, and Wilmington Savings Fund Society, among others.

The strengths of the area economy continue to be an above-average per capita income relative to both the state and the region; relatively low state and local taxes; and low business costs. However, the area has a low industrial diversity; strict land-use regulations in its urban areas; and a weakening migration trend. In addition, the recent turmoil in national financial services has negatively impacted the local economy. Wilmington is losing jobs faster than the nation, and its unemployment rate has risen at nearly the same rate as the nation. In addition, stalled real personal income is accelerating the decline in retail sales, and state and local government deficits have slowed public sector hiring.

The largest employers in the Wilmington MD are the Christiana Care Health System, E.I. du Pont de Neumours & Company, Bank of America Corporation, JPMorgan Chase Company, Astra Zeneca Pharmaceuticals, and the University of Delaware. Unemployment rates have increased across the assessment area, with unemployment highest in the city of Wilmington (10.7%) and lowest in the city of Newark (4.8%). The recent closure of the Chrysler plant in Newark, as well as the temporary suspension of operations at the Newport GM plant, provided a significant bump to Wilmington's unemployment.

For comparison purposes, area unemployment rates are presented in the table below.

Locations	April 2009	April 2008
New Castle County	7.5%	3.7%
City of Wilmington	10.7%	6.4%
City of Newark	4.8%	3.0%
State of Delaware	7.5%	3.9%
Nationwide	8.9%	5.0%

HOUSING

According to the 2000 Census, the assessment area contains 199,521 housing units, 66% of which are owner-occupied. Single family units comprise 73% of the assessment area's housing units, while multi-family units comprise 19%. Two-to-four family units comprise just 5% of the housing units and mobile homes 3%. Sixteen percent of all housing units in the assessment area are located in the city of Wilmington and 14% are in the city of Newark.

The 2000 Census data indicate that the median housing value is \$132,932 in the Wilmington MD assessment area. There is a significant disparity between the median housing value in the area's upper-income census tracts (\$192,414) and that in low-income (\$66,815) and moderate-income (\$90,619) tracts. The median value in middle-income tracts is \$121,740. Moody's Economy.com estimates that the average existing home price in the Wilmington MD decreased to \$222,500 in 2008, compared to \$239,500 in 2007 (a 7% decline).

Median gross rent in the bank's assessment area is \$671 per month, with 36% of renters paying more than 30% of their income for housing.

Overall, housing is most affordable in the city of Wilmington. Housing and rental costs are higher in the city of Newark, mainly influenced by rental housing for students. The largest employer in Newark is the University of Delaware. The University has approximately 16,000 undergraduate and 3,500 graduate students and more than 4,000 employees. According to the 2000 Census data:

New Castle County	Median Housing Value	Median Gross Rent
New Castle County	\$132,932	\$671
City of Wilmington	\$89,258	\$596
City of Newark	\$148,065	\$702
Delaware	\$122,000	\$639

Despite lower housing costs in many of the low- and moderate-income census tracts, owner-occupancy in these tracts is only 25% and 52%, respectively. This lagged the owner-occupancy levels in middle- and upper-income census tracts of 68% and 80%, respectively. The statewide owner-occupancy rate for Delaware is 63%.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for residential mortgage lending. In the Wilmington MD, just 2% of owner-occupied units are located in low-income census tracts, 15% are in moderate-income tracts, 51% are in middle-income tracts, and 33% are in upper-income tracts. Of the 21,285 owner-occupied units located in low- and moderate-income tracts, 33% are located in the city of Wilmington.

BORROWER INCOME DATA

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon annually adjusted median family income data made available by HUD. According to 2000 Census data, the median family income for the Wilmington MD was \$62,100, higher than the state of Delaware at \$55,257. In 2008, the adjusted median family income for the Wilmington MD, as reported by HUD, increased to \$73,900.

Of the total families in the assessment area, 18% are designated as low-income and 17% are moderate-income. Families living below the poverty level represent 6% of the total families in the assessment area. Across the state of Delaware, 6% of families live below the poverty level.

GEOGRAPHIC BUSINESS DATA

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for small business credit within such census tracts. According to Dun and Bradstreet, 12% of businesses in the assessment area are located in low-income census tracts and 16% are in moderate-income tracts. The majority of businesses are located in middle- (42%) and upper-income (30%) tracts.

The demographics used to assess the performance context in which Wilmington Trust operates are detailed in the following table.

Wilmington Trust Company Assessment Area Demographics Wilmington MD New Castle County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	7.9	4,190	3.3	1,397	33.3	23,614	18.4
Moderate-income	23	18.1	21,578	16.9	2,430	11.3	22,106	17.3
Middle-income	61	48.0	64,003	50.0	2,704	4.2	30,070	23.5
Upper-income	32	25.2	38,226	29.9	653	1.7	52,207	40.8
Unknown income	1	0.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	127	100.0	127,997	100.0	7,184	5.6	127,997	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	8,112	2,024	1.5	25.0	4,870	60.0	1,218	15.0
Moderate-income	37,122	19,261	14.5	51.9	14,678	39.5	3,183	8.6
Middle-income	100,389	67,893	51.2	67.6	27,935	27.8	4,561	4.5
Upper-income	53,898	43,315	32.7	80.4	8,959	16.6	1,624	3.0
Unknown income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	199,521	132,493	100.0	66.4	56,442	28.3	10,586	5.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2,635	11.9	2,229	11.4	320	15.9	86	14.7
Moderate-income	3,531	16.0	3,032	15.6	386	19.1	113	19.3
Middle-income	9,357	42.4	8,245	42.3	847	42.0	265	45.3
Upper-income	6,552	29.7	5,972	30.6	461	22.9	119	20.3
Unknown income	19	0.1	15	0.1	2	0.1	2	0.3
Total Assessment Area	22,094	100.0	19,493	100.0	2,016	100.0	585	100.0
	Percentage of Total Businesses:			88.2			9.1	2.6

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

The lending test evaluates an institution's lending activities based on the following characteristics:

- geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- borrowers' profile, including distribution of loans to low- and moderate-income borrowers and small businesses;
- overall responsiveness to credit needs of highly economically disadvantaged census tracts, low-income persons, and very small businesses; and
- community development lending activities.

Performance under the lending test is outstanding in the Wilmington MD assessment area.

Geographic Distribution of Loans

The geographic distribution of loans in the Wilmington MD was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The analysis reflects excellent penetration, including in low- and moderate-income census tracts.

Home Mortgage Lending

The percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such census tracts. A lower level of owner-occupied units limits the bank's lending opportunities in these tracts. A review of Wilmington Trust's mortgage lending activity reflects excellent penetration throughout the Wilmington MD assessment area.

During the period evaluated, Wilmington Trust made 1,611 home mortgage loans in the Wilmington MD, in an aggregate amount of \$235 million. In the Wilmington MD, 2% of all owner-occupied housing units are located in low-income census tracts and 15% are located in moderate-income tracts. By comparison, 3% of Wilmington Trust's home mortgage loans were originated in low-income tracts and 21% were in moderate-income tracts. Wilmington Trust's home mortgage lending is compared to all lenders operating in the assessment area. According to 2008 aggregate HMDA data, 2% of all home mortgage loans were made in low-income census tracts and 17% were in moderate-income tracts.

Overall, Wilmington Trust's performance was better than aggregate lending and above owner-occupied housing levels in both low- and moderate-income areas, although the lending opportunities were modest for banks operating in the low-income areas due to the limited amount of owner-occupied housing available.

Small Business Lending

A comparison of the number of small business loans originated in each type of census tract to the number of businesses located in such tracts demonstrates the bank's commitment to making credit available to its entire community. A review of Wilmington Trust's small business lending activity reflects excellent penetration throughout the assessment area, given the economic characteristics of the Wilmington MD.

During the period evaluated, Wilmington Trust made 1,086 small business loans in the assessment area, in an aggregate amount of \$187 million. Business demographics revealed a total of 22,094 businesses within the assessment area. The bank's extension of credit to these businesses shows that 10% of its small business loans were in low-income census tracts, while 12% of businesses are located in these tracts. Moderate-income tracts received 18% of small business loans, while 16% of businesses are located in these tracts. Middle-income tracts received 41% of small business loans and 42% of businesses are located in these tracts. Upper-income census tracts received 31% of small business loans for their 30% share of businesses.

Wilmington Trust's small business lending was compared to all lenders operating in the assessment area. Aggregate loan data show that 6% of all reported small business loans were made in low-income census tracts and 14% were made in moderate-income tracts. Overall, Wilmington Trust performed better than the aggregate lending in both low- and moderate-income census tracts. In addition, in moderate-income census tracts, Wilmington Trust's performance was better than the percentage of small businesses located in these tracts.

Although the lending opportunities were limited for banks operating in the low-income areas due to the limited number of businesses operating in these tracts, Wilmington Trust was more successful than other banks in these areas.

Distribution of Loans by Borrower Income Level and Revenue Size of the Business

Home mortgage and small business lending data were analyzed, in conjunction with a review of the demographic and economic characteristics of the assessment area, to determine the extent of lending to borrowers of different income levels and to businesses of different sizes.

Lending to Borrowers of Different Income Levels

An analysis of the distribution of home mortgage loans among retail customers of different income levels, including low- and moderate-income customers, reflects excellent penetration in the Wilmington MD. The demographics of the assessment area show that of the 127,997 families in the assessment area, 18% are designated as low-income and 17% are moderate-income. By comparison, the distribution of Wilmington Trust's home mortgage loans to these borrowers shows that 11% of loans were to low-income borrowers and 27% were to moderate-income borrowers.

The distribution of loans to low-income families in comparison to the demographics of the assessment area shows that lending levels do not correspond to the percentage of low-income families in the assessment area. However, the bank's level of penetration is considered good given that the credit needs of the low-income segment of the population can be difficult to address through conventional loan products, presenting a significant obstacle to home ownership. In particular, 36% of renters in the assessment area pay more than 30% of their income for housing, making it difficult to save for a down payment on a house. Obstacles to home ownership also exist for moderate-income families; however, Wilmington Trust's distribution of loans to moderate-income borrowers in the assessment area is excellent.

Wilmington Trust's home mortgage lending was compared to all lenders operating in the Wilmington MD. An analysis of aggregate data show that 8% of all home mortgage loans made in the assessment area were to low-income borrowers and 24% were to moderate-income borrowers. Overall, Wilmington Trust's performance was better than aggregate lending with both low- and moderate-income borrowers.

The bank's participation in innovative and flexible lending programs that address the specific credit needs of low- and moderate-income borrowers enhanced its home mortgage lending profile.

Most notably, the bank offers its Affordable Housing Program, a mortgage product restricted to low- and moderate-income borrowers which offers discounted loan rates and flexible underwriting standards, including the use of alternative credit documentation. The program also includes down payment assistance and home ownership counseling.

The bank also offers three Fannie Mae loan products (Flexible 97 Mortgage, Flexible 100 Mortgage, and My Community Mortgage). These products help lenders serve low- and moderate-income borrowers and communities by offering flexible terms and options. All three products are targeted to first-time home buyers and primarily serve low- and moderate-income borrowers. Wilmington Trust is also a participating lender in the Delaware State Housing Authority's Single Family Mortgage Revenue Bond Program which provides mortgage financing to low- and moderate-income Delaware homebuyers at below-market interest rates.

During the period evaluated, the bank originated 379 loans, aggregating \$71 million, under these programs. In the Wilmington assessment area, the bank originated 323 of these loans, aggregating \$61.1 million.

The bank uses down payment and settlement assistance programs in conjunction with its innovative and flexible lending products. These programs (Delaware State Housing Authority Second Mortgage Assistance Loan; Live Near Your Work; Delaware Housing Partnership; and the Federal Home Loan Bank of Pittsburgh (FHLB) First Front Door) are designed to provide low- and moderate-income homebuyers with down payment and closing cost assistance. During the period evaluated, 76 homebuyers in the bank's assessment areas received \$405 thousand in matching funds assistance through these programs. In the Wilmington assessment area, 71 homebuyers received \$388 thousand in matching funds assistance.

Wilmington Trust provided \$2.4 million in funding to Delaware Community Investment Corporation's (DCIC) housing loan funds. DCIC is a multibank community development corporation which finances community development projects across Delaware. Of the total funding, \$1.5 million supported eight affordable housing projects in New Castle County, providing 291 units of affordable housing. The bank also provided \$99 thousand in funding for a group home for low- and moderate-income residents which benefited all of the bank's assessment areas. The portion attributed to New Castle County was \$33 thousand, providing 19 units of affordable housing.

In addition, Wilmington Trust participates in three small-dollar consumer loan programs administered by West End Neighborhood House, a non-profit community group. These programs are the Security Deposit Loan Program (SDLP); the Job Start Loan Program (JSLP); and Loans Plus!. SDLP helps low- and moderate-income persons overcome the financial barriers of relocating to better affordable housing by providing loans to pay security and utility deposits and moving vendors.

JSLP assists low- and moderate income persons overcome the financial obstacles to entering or re-entering the workforce by providing critical assistance with up-front expenses such as childcare, work clothing and transportation. Loans Plus! serves as an alternative to more expensive pay-day loans and provides a borrower education component to help break the cycle of chronic poverty. Wilmington Trust participated in the FDIC's Small Dollar Loan Pilot program with this product.

The bank's participation in loan programs that provide affordable small-dollar consumer loans, with reasonable terms, is responsive to the credit needs of low- and moderate-income borrowers and communities in its assessment areas. During the period evaluated, the bank originated 89 loans under these programs, aggregating \$61,337.

Lending to Businesses of Different Sizes

Small business lending data were analyzed to determine the extent of lending to businesses of different sizes, including small businesses. A small business is defined as a business with gross annual revenues of \$1 million or less. Using this definition, bank lending was analyzed to determine whether loans were made to small businesses. Wilmington Trust's distribution of loans reflects good penetration among business customers of different sizes.

Of the 1,086 small business loans the bank originated in the Wilmington MD during the evaluation period, 545 loans, or 50%, were originated to small businesses. By comparison, a review of all lenders in the market shows that 31% of all small business loans were made to small businesses. In addition, of the 1,086 small business loans originated by the bank, 58% were extended in an amount of \$100 thousand or less. The number of small business loans originated in amounts of \$100 thousand or less is significant because smaller size loans are generally commensurate with the borrowing needs of smaller businesses and, as such, Wilmington Trust's lending activity demonstrates it is meeting the credit needs of smaller businesses. A review of all lenders in the market shows that 95% of all small business loans were extended in an amount of \$100 thousand or less (this includes corporate credit cards).

Wilmington Trust's participation in innovative and flexible lending programs which address the specific credit needs of small businesses enhanced its small business lending profile. Most notably, the bank participates as a U.S. Small Business Administration (SBA) lender. During the period evaluated, the bank originated 81 SBA loans, aggregating \$9.7 million. Thirty of these loans were made in New Castle County.

Wilmington Trust also participates in the FHLB's Banking on Business Program (BOB). BOB assists member financial institutions in providing capital to underserved areas and underserved populations. FHLB member banks make loans to small businesses using a combination of bank financing and BOB funds. During the evaluation period, Wilmington Trust used \$373 thousand in BOB funds to help finance five businesses in the bank's assessment areas. Four of these loans were made in the Wilmington MD.

Community Development Lending

Wilmington Trust is a leader in making community development loans in the Wilmington MD assessment area. During the time period evaluated, the bank originated eight community development loans totaling \$15.6 million to finance community development initiatives. Six loans totaling \$11.9 million supported affordable housing, one loan for \$3.7 million supported economic development, and one loan for \$84 thousand supported the provision of community development services.

The loans supporting the development of affordable housing in the assessment area were significant as these multi-family dwellings provide affordable rental housing alternatives to low- and moderate-income families and seniors while helping to stabilize the neighborhoods in which they are located.

Responsiveness to Credit Needs

Wilmington Trust exhibits an excellent record of serving the credit needs of the most economically disadvantaged areas of this assessment area, including low-income borrowers and very small businesses, consistent with safe and sound banking practices. The bank achieved this record primarily through its community development lending and the use of innovative and flexible lending practices in order to serve assessment area credit needs.

Investment Test

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income census tracts or individuals. The test also considers the innovativeness and complexity of these investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of CRA, the term "qualified investment" includes a lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Performance under the investment test is satisfactory in the Wilmington assessment area. Of Wilmington Trust's total current investments, 47% are attributed to this assessment area.

Volume of Investment and Grant Activity

A review of investment activity shows that Wilmington Trust has a significant level of qualified community development investments and grants in the Wilmington MD assessment area. Overall, investments aggregate \$11.7 million. The large majority of these investments (86%) support affordable housing, while 12% of investments support economic development and 2% support the provision of community development services.

The bank made a \$1.6 million investment in the Delaware Community Investment Corporation's (DCIC) housing loan funds. The bank's continued relationship with the DCIC, a multi-bank community development corporation, is notable. DCIC collaborates with public and private developers, government agencies and other local banks to create affordable housing in Delaware. DCIC also provides permanent financing for commercial real estate projects located in areas targeted for revitalization. Wilmington Trust's funding supported seven DCIC affordable housing projects which provided 524 units of affordable housing. All of the projects are located in New Castle County. The bank's outstanding investment in DCIC projects totals \$4.2 million.

In addition, \$3.1 million of bank investments are targeted mortgage-backed securities containing residential mortgage loans originated to low- and moderate-income borrowers, or inside low- and moderate-income census tracts in the assessment area. The bank also holds a \$750 thousand investment in a Delaware small business investment company, of which \$250 thousand is attributed to its Wilmington assessment area. The investment promotes economic development by financing small businesses and benefits a broader regional area that includes the bank's assessment areas.

Wilmington Trust also holds 21 equity investments, recognized in previous evaluations, which remain outstanding. These investments, totaling \$18.4 million, support affordable housing for low- and moderate-income residents and small business development across Delaware. Wilmington Trust provided significant financing for these projects which were at times complex investments that helped address a specific demographic need for affordable housing. According to both demographic data and community contacts, there is a market demand, particularly in New Castle County, for affordable housing. The portion of these investments attributed to the Wilmington MD assessment area is \$6.2 million.

In addition to these investments, Wilmington Trust made grants and contributions to various organizations that routinely provide affordable housing, economic development, and community development services that benefit low- and moderate-income individuals and areas. During the period evaluated, the bank made \$567 thousand in qualified grants and donations that benefit the Wilmington MD assessment area.

Responsiveness to Credit and Community Development Needs

Wilmington Trust exhibits good responsiveness to credit and community economic development needs through the use of investments. A large portion of the bank's investments support affordable housing in an area with a demonstrated need for affordable housing.

Service Test

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- the accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- the impact of changes in branch locations upon low- and moderate-income census tracts and low- and moderate-income persons in the assessment area;
- the reasonableness of business hours and services in meeting assessment area needs; and
- the extent to which an institution provides community development services.

The bank's performance under the service test is rated outstanding in the Wilmington MD.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the bank's assessment area. Wilmington Trust currently operates 24 branches in the Wilmington MD. Of these branches, three are located in low-income census tracts and four are in moderate-income tracts, representing 30% of bank branches, while 22% of the assessment area population resides in low- or moderate-income tracts. All of the Wilmington MD branches operate ATMs and have extended evening hours.

The following table details the locations of the bank’s branches in the Wilmington MD, compared to the population.

Census Tract	Number of Branches	Percent	Total Population	Percent
Low-income	3	13	20,852	4
Moderate-income	4	17	88,174	18
Middle-income	8	33	253,263	51
Upper-income	9	37	137,976	27
TOTALS	24	100	500,265	100

Alternative Retail Banking Services and Alternative Methods of Delivering Retail Banking Services

To supplement traditional banking services, Wilmington Trust offers telephone banking through its Client Services Center, including deposit account opening, telephone transfers, and bill paying. These services are available Monday through Saturday. The bank also provides “Touch-Tone Banking” 24 hours a day, 7 days a week, where customers can access information on their accounts, transfer money, or pay bills by phone.

The bank offers on-line banking, which allows customers direct access to their accounts at any time via computer. This includes account balance information, bill-pay and stop payment service, and bank to bank transfers at www.wilmingtontrust.com.

Through the bank’s partnership with West End Neighborhood House in Wilmington, low- and moderate-income individuals can apply for small dollar loans for a variety of purposes through “Loans Plus”, a program established as an affordable alternative to payday lending.

Changes in Branch Locations

Wilmington Trust’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems. Since the previous evaluation, no branches were opened or closed in the Wilmington MD assessment area.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services, including business hours, do not vary among branch offices in a way that inconveniences portions of the assessment area, particularly low- and moderate-income census tracts or individuals. Banking services are offered in a uniform and consistent manner among all branches.

Community Development Services

Wilmington Trust is a leader in providing community development services that are tailored to the convenience and needs of its assessment area. Numerous bank officers and employees participate on loan and finance committees, make presentations for small business development and homeownership seminars, and financial literacy programs; provide technical expertise, and serve in various capacities on boards of community development organizations. The most notable of these services are listed on the following page.

- A bank officer serves on the loan review committee for West End Neighborhood House, a non-profit organization providing community development services in Delaware, including small dollar affordable loan programs. Wilmington Trust also provides monthly loan report services to West End and bank staff conducts financial literacy seminars for its clients.
- In cooperation with the Delaware Financial Literacy Institute (DFLI) and the Delaware Center for Economic Education and Entrepreneurship (CEEE), Wilmington Trust staff integrated the Bank at School (BAS) Financial Education Program into 19 elementary and middle schools in Delaware. Bank staff provides classroom instruction on banking services. Ten of the 19 schools are located in New Castle County, of which five serve primarily low- and moderate-income students.

The bank made a significant commitment to the program and dedicated significant resources to revitalize and strengthen the BAS program, including creating metrics to measure the program's success and strengthening school, teacher, and student participation.

- Wilmington Trust is a member of the FHLB and an active participant in its Affordable Housing Program (AHP). The purpose of the AHP is to provide subsidies for projects that finance homeownership for low- and moderate-income households or affordable rental housing for low-income households. Only member institutions of the FHLB can submit AHP applications. Therefore, nonprofit agencies, local governments, and community development organizations must obtain the support of member institutions to apply for AHP funds. In addition to sponsoring an application, Wilmington Trust is responsible for monitoring the approved project and ensuring that the housing project is consistent with its approved program objectives. The bank is currently administering grants, totaling \$700 thousand, for two projects with Habitat for Humanity and one project for Cornerstone West.
- A bank officer serves on the Executive Committee of the Riverfront Development Corporation, a state supported organization charged with redeveloping Wilmington's Christiana Riverfront which is seen as a key to the revitalization of Wilmington.
- A bank officer serves on the board of directors of Wilmington Housing Partnership, a private/public partnership that creates affordable housing in the city of Wilmington. The employee provides ongoing technical assistance on various underwriting issues.
- A bank officer serves on the board of directors of Children and Families First (CFF), a nonprofit human services agency providing services to low- and moderate-income families across Delaware. The services include a welfare-to-work program and emergency in-home shelter care. The bank officer also serves on CFF's finance and audit committees.
- A bank officer serves on the board of directors, the housing loan fund committee, and the community investment loan fund committee for the Delaware Community Investment Corporation (DCIC). DCIC supports community revitalization by financing affordable housing and related activities addressing the needs of low- and moderate-income areas in Delaware. A second bank officer serves on DCIC's planning and personnel committees.

- A bank officer serves on the Advisory Council for the FHLB of Pittsburgh's Blueprint Communities initiative in Delaware. The program is designed to serve as a catalyst for revitalization resulting in sustainable communities by facilitating community planning and encouraging public and private investment. Two additional bank employees volunteer for the Eastside and the Rose Hill Blueprint Communities in New Castle County.
- A bank employee serves on the board of directors and chairs the loan committee at First State Community Loan Fund, a non-profit community development financial institution that supports small businesses and affordable housing in Delaware.
- A bank officer serves on the board of directors of Interfaith Community Housing, a non-profit affordable housing developer in Delaware. A second employee serves on the corporate advisory council.
- Bank employees made presentations and provided homebuyer counseling for affordable housing organizations including Interfaith Community Housing, YWCA, NCALL Research, First State Community Action Agency, and Faith Based Homeownership Initiative.

Bank Products

Wilmington Trust offers bank products that give small businesses and low- and moderate-income individuals greater access to banking services. To meet the needs of new or smaller businesses with lower activity and deposit balances, the bank offers a free business checking account with no monthly service fees, no teller charges, and no per check fees. Online banking and bill payment is offered free with this account.

To serve the needs of low- and moderate-income individuals, the bank offers a free checking account with no minimum balance requirement, no monthly maintenance fee, and unlimited check writing. On-line banking and bill payment services are free with this account.

Wilmington Trust issued two commercial letters of credit in the Wilmington assessment area. The letters of credit qualify as a community development service because the letters provide the necessary credit support for community development initiatives inside the assessment area. One letter supported the redevelopment of a 633-unit affordable housing complex in a moderate-income area of Claymont, Delaware. A second letter of credit supported the acquisition and renovation of a 72-unit affordable housing complex in a low-income area in the city of Wilmington.

SUSSEX COUNTY, DELAWARE, NON-METROPOLITAN AREA

DESCRIPTION OF ASSESSMENT AREA

For purposes of this CRA evaluation, Wilmington Trust has designated Sussex County in southern Delaware as an assessment area. There are 36 census tracts in the county, of which 33 are middle-income and 3 are upper-income. There are no low- or moderate-income census tracts in Sussex County. Georgetown is the county seat, and the Seaford micropolitan statistical area in the western part of the county is the largest urban center, containing 14% of the county population.

Wilmington Trust's performance was evaluated in terms of the demographic and business context in which it operates. According to the FDIC's Summary of Deposits as of June 30, 2008, 15 depository institutions operate in Sussex County. These institutions maintain a total of 65 branches holding \$27 billion in deposits. Wilmington Trust, with 13 branches in the market, ranked 2nd, with \$810 million, and 3% of the retail deposit market. This deposit market is dominated by Discover Bank, which holds 91% of all deposits in the county. The Sussex County assessment area branches hold approximately 10% of Wilmington Trust's total deposits.

Wilmington Trust's major banking competitors for loans in this market are PNC Bank Delaware and Citizens Bank. Local competitors include County Bank, headquartered in Rehoboth Beach, DE; Delaware National Bank, headquartered in Georgetown, DE; and Bank of Delmarva, headquartered in Seaford, DE.

Wilmington Trust's home mortgage loans were compared to the aggregate of all lenders in the market reporting HMDA loans. These data are reported annually and 2008 is the most recent year for which information is available. The bank ranks 6th with a market share of just 3%, in a market with 325 HMDA reporters. Countrywide Bank FSB ranked 1st with a market share of 14%. Wilmington Trust was the highest ranked Delaware bank.

Among small business lenders, Wilmington Trust ranked 9th in Sussex County with 3% of the market. American Express Bank FSB ranked 1st with 21% of the market, although this bank's small business lending includes corporate credit cards. In 2008, the assessment area had a total of 53 small business reporters.

ECONOMIC CHARACTERISTICS

According to 2000 census data, the population of Sussex County was 156,638. By 2008, the population had increased by 20% to 188,036, primarily because the eastern part of the county has attracted a large number of retirees to its beach and resort communities. Of the total county population, 20% are now age 65 and older.

While the eastern portion of 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 Sussex County include the State of Delaware and county governments, and the Beebe Medical Center.

Due to the current recession, both state and local government budgets are under stress. For Delaware, the recession has significantly reduced state corporate income tax revenue. The economic impact of the budget trouble is significant mainly because state government has been a steady source of hiring in recent years. In addition, tourism has slowed, constraining Sussex County's important leisure/hospitality industry and causing job losses.

Highlights of the Sussex County economy include the continued low cost of conducting business and the area's attractiveness to retirees. In addition, the overall decline in house prices in the state has been less severe in southern Delaware, where retirees support demand. With house prices declining and mortgage rates at historic lows, housing affordability has increased.

The unemployment rate for Sussex County was 7.6% in April 2009, compared to 4.4% one year earlier. Unemployment rates in the county and the state remain lower than the national average of 8.9%. For comparison purposes, the unemployment rates are presented in the table below.

Locations	April 2009	April 2008
Sussex County	7.6%	4.4%
Seaford Micropolitan Area	7.6%	4.4%
State of Delaware	7.5%	3.9%
Nationwide	8.9%	5.0%

HOUSING

According to the 2000 Census, Sussex County contains 93,070 housing units, of which 54% are owner-occupied, 13% are rental, and 33% are designated as vacant. The high level of vacant housing in Sussex County is a function of the local housing market. The eastern portion of the county is a major recreation destination and the high vacancy rate decreases after subtracting units classified as "for seasonal, recreational, or occasional use." The overall owner-occupancy rate in the state is 63%.

The percentage of units housing 1- 4 families is 67%, while 7% housed five families or more. Mobile homes were 26% of total housing units. The median age of housing stock in Sussex County is 20 years, which is lower than the median age of housing stock in Delaware at 27 years. The median housing value in Sussex County is \$99,739. There is a significant disparity in housing values in upper-income census tracts (\$218,599) compared to middle-income tracts (\$94,710). The majority of the higher cost housing is located in the eastern Sussex County beach area.

Median gross rent in the assessment area is \$507 per month, with 28% of renters paying more than 30% of their income for housing. For the state of Delaware, median gross rent is higher at \$639 per month, with 34% of renters paying more than 30% of income for housing.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for residential mortgage lending. In the bank's assessment area, 90% of owner-occupied units are located in the middle-income tracts and 10% of units are in upper-income tracts.

BORROWER INCOME DATA

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon annually adjusted median family income data made available by HUD. According to 2000 Census data, the median family income for Sussex County was \$45,189, lower than for the state of Delaware at \$55,257.

The Delaware non-MSA adjusted median family income for 2008 is \$54,700. Of the total families in the Sussex County assessment area, 18% are designated as low-income, 20% are moderate-income, 24% are middle-income, and 38% are upper-income (based on the 2008 family income). Families living below the poverty level represent 8% of the total families in the assessment area. In Delaware, 6% of families live below the poverty level.

GEOGRAPHIC BUSINESS DATA

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for small business credit within such census tracts. According to Dun and Bradstreet, 81% of businesses in the assessment area are located in middle-income tracts and 19% are in upper-income tracts.

The demographics used to assess the performance context in which Wilmington Trust operates are detailed in the table on the following page.

Wilmington Trust Company Sussex County, Delaware Assessment Area Demographics								
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	7,999	18.1
Moderate-income	0	0.0	0	0.0	0	0.0	8,608	19.5
Middle-income	33	91.7	40,576	92.0	3,320	8.2	10,572	24.0
Upper-income	3	8.3	3,514	8.0	83	2.4	16,911	38.4
Unknown income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	36	100.0	44,090	100.0	3,403	7.7	44,090	100.0
	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	72,742	45,544	90.2	62.6	10,970	15.1	16,228	22.3
Upper-income	20,328	4,961	9.8	24.4	1,102	5.4	14,265	70.2
Unknown income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	93,070	50,505	100.0	54.3	12,072	13.0	30,493	32.8
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	6,759	81.2	6,111	81.2	436	84.5	212	74.9
Upper-income	1,567	18.8	1,416	18.8	80	15.5	71	25.1
Unknown income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8,326	100.0	7,527	100.0	516	100.0	283	100.0
	Percentage of Total Businesses:			90.4		6.2		3.4
	Total Farms By Tract	Farms 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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	316	98.4	312	98.4	4	100.0	0	0.0
Upper-income	5	1.6	5	1.6	0	0.0	0	0.0
Unknown income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	321	100.0	317	100.0	4	100.0	0	0.0
	Percentage of Total Farms:			98.8		1.2		0.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution’s lending activities based on the following characteristics.

- geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- borrowers’ profile, including distribution of loans to low- and moderate-income borrowers and small businesses;
- overall responsiveness to credit needs of highly economically disadvantaged geographies, low-income persons, and very small businesses; and
- community development lending activities.

Performance under the lending test is rated satisfactory in the Sussex County assessment area.

Geographic Distribution of Loans

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The analysis reflects good penetration throughout the assessment area.

Home Mortgage Lending

The percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such census tracts. A lower level of owner-occupied units limits the bank's lending opportunities in these tracts. A review of Wilmington Trust's mortgage lending activity reflects good penetration throughout Sussex County.

During the period evaluated, Wilmington Trust made 800 home mortgage loans in Sussex County, in an aggregate amount of \$96.3 million. There are no low- or moderate-income census tracts in the Sussex County assessment area. Ninety percent of all owner-occupied housing units are located in middle-income census tracts and 93% of Wilmington Trust's home mortgage loans were originated in middle-income tracts. The remaining 10% of owner-occupied housing units are in upper-income tracts and 7% of mortgage loans were originated in those tracts.

The bank's home mortgage lending was compared to all lenders operating in Sussex County. Based on 2008 aggregate data, 85% of all home mortgage loans made in the county were in middle-income tracts and 15% were in upper-income tracts. This comparison shows that Wilmington Trust's performance was similar to the market in this assessment area.

Small Business Lending

A comparison of the number of small business loans originated in each type of census tract to the number of businesses located in such tracts demonstrates the bank's commitment to making credit available to its entire community. A review of Wilmington Trust's small business lending activity reflects good penetration throughout the assessment area, given the economic characteristics of Sussex County.

During the period evaluated, Wilmington Trust made 414 small business loans in the assessment area, in an aggregate amount of \$60 million. Business demographics revealed a total of 8,326 businesses within the assessment area. The bank's extension of credit to these businesses shows that middle-income census tracts received 86% of small business loans, while 81% of businesses are located in these tracts. Upper-income tracts received 14% of small business loans, while 19% of businesses are located in those tracts.

The bank's small business lending was compared to all lenders operating in Sussex County. Aggregate data show that 78% of all small business loans were made in middle-income tracts and 16% were made in upper-income tracts. Aggregate data show that Wilmington Trust's lending performance is considered good when compared to both the geographic distribution of businesses in the assessment area and aggregate lending levels.

Distribution of Loans by Borrower Income Level and Revenue Size of the Business

Home mortgage and small business lending data were analyzed, in conjunction with a review of the demographic and economic characteristics of the assessment area, to determine the extent of lending to borrowers of different income levels and to businesses of different sizes.

Lending to Borrowers of Different Income Levels

An analysis of the distribution of home mortgage loans among retail customers of different income levels, including low- and moderate-income customers, reflects excellent penetration in the Sussex County assessment area. The demographics of the assessment area show that of the 44,090 families in the assessment area, 18% are designated as low-income and 20% are moderate-income. By comparison, 7% of the bank's home mortgage loans were to low-income borrowers and 22% were to moderate-income borrowers.

Wilmington Trust's home mortgage lending was compared to all lenders operating in Sussex County. Aggregate data show that just 3% of all home mortgage loans made in the county were to low-income borrowers and 11% were to moderate-income borrowers. Overall, Wilmington Trust's performance was significantly better than the aggregate with both low- and moderate-income borrowers.

Wilmington Trust's participation in innovative and flexible lending programs that address the specific credit needs of low- and moderate-income borrowers enhanced its home mortgage lending profile. Most notably, the bank offers its Affordable Housing Program, a mortgage product for low- and moderate-income borrowers which offers discounted loan rates and flexible underwriting standards, including the use of alternative credit documentation. The program also includes down payment assistance and homeownership counseling.

The bank also offers three Fannie Mae loan products (Flexible 97 Mortgage, Flexible 100 Mortgage, and My Community Mortgage). These products help lenders serve low- and moderate-income borrowers and communities by offering flexible terms and options. All three products are targeted to first-time homebuyers and primarily serve low- and moderate-income homebuyers. Wilmington Trust is also a participating lender in the Delaware State Housing Authority's Single Family Mortgage Revenue Bond Program which provides mortgage financing to low- and moderate-income Delaware homebuyers at below-market interest rates.

During the period evaluated, the bank originated 379 loans, aggregating \$70.5 million, under these programs. In the Sussex County assessment area, the bank originated 29 of these loans, aggregating \$5.1 million.

Wilmington Trust provided \$2.4 million in funding to DCIC's housing loan funds. Of the total funding, \$644 thousand supported three affordable housing projects in Sussex County, providing 287 units of affordable housing. The bank also provided \$99 thousand in funding for a group home for low- and moderate-income residents which benefited all of the bank's assessment areas. The portion attributed to the Sussex County assessment area was \$32,984, providing 19 units of affordable housing.

Lending to Businesses of Different Sizes

Small business lending data were analyzed to determine the extent of lending to businesses of different sizes, especially small businesses. A small business is defined as a business with gross annual revenues of \$1 million or less. Using this definition, the bank's small business lending was analyzed to determine whether loans were made to small businesses. Wilmington Trust's distribution of loans reflects excellent penetration among business customers of different sizes.

Of the 414 small business loans originated by the bank during the evaluation period in Sussex County, 232 (or 56%) were originated to small businesses. By comparison, a review of all lenders in the market shows that 35% of all small business loans were to small businesses.

In addition, 277 of the small business loans (or 67%) were extended in an amount of \$100 thousand or less. The number of small business loans originated in amounts of \$100 thousand or less is significant because smaller size loans are generally commensurate with the borrowing needs of small businesses and, as such, the bank's lending activity demonstrates that it is meeting the credit needs of smaller businesses.²

Wilmington Trust's participation as an SBA lender aids the bank in addressing the specific credit needs of small businesses. During the period evaluated, the bank originated 81 SBA loans, aggregating \$9.7 million. Twenty six of these loans were made in Sussex County.

Community Development Lending

Wilmington Trust did not originate any community development loans in Sussex County during the period evaluated.

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income census tracts or individuals. The test also considers the innovativeness and complexity of these investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of CRA, the term "qualified investment" includes a lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Performance under the investment test is satisfactory in the Sussex County assessment area. Of Wilmington Trust's total current investments, 26% are attributed to this assessment area.

Volume of Investment and Grant Activity

A review of investment activity shows that Wilmington Trust has a significant level of qualified community development investments and grants in the Sussex County assessment area. Overall, investments aggregate \$6.4 million. The majority of these investments (78%) support affordable housing, while 21% of investments support economic development and 1% support the provision of community development services.

² Wilmington Trust also originated 19 small farm loans, aggregating \$3 million. Ninety percent of these loans were made to small farms and 53% was in an amount of \$100 thousand or less.

The bank holds a \$750 thousand investment in a Delaware small business investment company, of which \$250 thousand is attributed to Sussex County. The investment promotes economic development by financing small businesses and benefits a broader regional area that includes the bank's assessment areas.

In addition, Wilmington Trust holds 21 equity investments, recognized in previous evaluations, which remain outstanding. These investments, totaling \$18.4 million, support affordable housing for low- and moderate-income residents and small business development across Delaware. Wilmington Trust provided significant financing for these projects which are at times complex investments that help address a specific demographic need in the assessment area for affordable housing. According to both demographic data and community contacts, there is a market demand for affordable housing for seniors in Sussex County where more than 19% of area residents are over 65 years of age and many are long-time residents of the area with limited incomes. The portion of these investments attributed to the Sussex County assessment area is \$6.1 million.

In addition to these investments, Wilmington Trust made grants and contributions to various organizations that routinely provide affordable housing, economic development, and community development services that benefit low- and moderate-income individuals and areas. During the period evaluated, the bank made \$73 thousand in qualified grants and donations that benefit the Sussex County assessment area.

Responsiveness to Credit and Community Development Needs

Wilmington Trust exhibits good responsiveness to credit and community economic development needs through the use of investments. A large portion of the bank's investments support affordable housing in an area with a demonstrated need for affordable housing, especially for seniors.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics.

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms.
- The impact of changes in branch locations upon low- and moderate-income census tracts and low- and moderate-income persons in the assessment area.
- The reasonableness of business hours and services in meeting assessment area needs.
- The extent to which an institution provides community development services.

Wilmington Trust's performance under the service test is rated satisfactory in Sussex County.

Accessibility of Delivery Systems

The bank's delivery systems are accessible to essentially all portions of the assessment area. Wilmington Trust operates 16 branches in Sussex County, of which 13 (81%) are located in middle-income areas. By comparison, 92% of the assessment area population resides in middle-income areas. Nineteen percent of branches are in upper-income tracts and 8% of the assessment area population resides in upper-income tracts. All of the Sussex County branches operate ATMs and have extended evening hours.

The following table details the locations of the bank's branches and the population served.

Census Tract	Number of Branches	Percent Branches	Population	Percent Population
Low-income	0	0	0	0
Moderate-income	0	0	0	0
Middle-income	13	81	144,515	92
Upper-income	3	19	12,123	8
TOTALS	16	100%	156,638	100%

Alternative Retail Banking Services and Alternative Methods of Delivering Retail Banking Services

To supplement traditional banking services, Wilmington Trust offers telephone banking through its Client Services Center, including deposit account opening, telephone transfers, and bill paying. These services are available Monday through Saturday. The bank also provides "Touch-Tone Banking" 24 hours a day, 7 days a week, where customers can access information on their accounts, transfer money, or pay bills by phone.

The bank offers on-line banking, which allows customers direct access to their accounts at any time via computer. This includes account balance information, bill-pay and stop payment service, and bank to bank transfers at www.wilmingtontrust.com.

Through the bank's partnership with West End Neighborhood House in Wilmington, low- and moderate-income individuals can apply for small dollar loans for a variety of purposes through "Loans Plus", a program established as an affordable alternative to payday lending.

Changes in Branch Locations

Wilmington Trust's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. Since the previous evaluation, no branches were opened or closed in Sussex County.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. Banking services are offered in a uniform and consistent manner among all branches.

Community Development Services

Wilmington Trust is a leader in providing community development services in the Sussex County assessment area. Numerous bank officers and employees participate on loan and finance committees; make presentations for small business development, homeownership seminars, and financial literacy programs; provide credit counseling and technical expertise; and serve in various capacities on boards of numerous community development organizations. The most notable of these include:

- In cooperation with the DFLI and the CEEE, Wilmington Trust staff integrated the Bank at School Financial Education Program into 19 elementary and middle schools in Delaware. Bank staff provides classroom instruction on banking services. Three of these schools are located in Sussex County and serve primarily low- and moderate-income students.

The bank made a significant commitment to the program and dedicated resources to revitalize and strengthen the BAS program, including creating metrics to measure the program's success and strengthening school, teacher, and student participation.

- A bank employee serves as president of the board of directors of the Nanticoke Senior Center in Seaford, a community organization that provides community development services to low- and moderate-income seniors, including budgeting and financial services.
- A bank officer serves on the board of directors of CFF, a nonprofit human services agency providing services to low- and moderate-income families across Delaware. The services include a welfare-to-work program and emergency in-home shelter care. The bank officer also serves on CFF's finance and audit committees.
- A bank officer serves on the board of directors, the housing loan fund committee, and the community investment loan fund committee for DCIC. A second bank officer serves on DCIC's planning and personnel committees. Wilmington Trust is a founding member of DCIC.
- A bank officer serves on the board of trustees of the Delaware Council on Economic Education and Entrepreneurship (DCEE). DCEE trains teachers in economic education and entrepreneurship principles with a goal to prepare an economically literate workforce.
- A bank employee serves on the board of directors and chairs the loan committee at First State Community Loan Fund, a non-profit community development financial institution that supports small businesses and affordable housing in Delaware.
- Several bank employees made presentations and provided homebuyer counseling for affordable housing organizations, including Interfaith Community Housing, the YWCA, First State Community Action Agency, Faith Based Homeownership Initiative, and the Delaware State Housing Authority.

Bank Products

Wilmington Trust offers bank products that give small businesses and low- and moderate-income individuals greater access to banking services. To meet the needs of new or smaller businesses with lower activity and deposit balances, the bank offers a free business checking account with no monthly service fees, no teller charges, and no per check fees. Online banking and bill payment is offered free with this account.

To serve the needs of low- and moderate-income individuals, the bank offers a free checking account with no minimum balance requirement, no monthly maintenance fee, and unlimited check writing. On-line banking and bill payment services are free with this account.

DOVER, DELAWARE, METROPOLITAN STATISTICAL AREA

DESCRIPTION OF ASSESSMENT AREA

For purposes of this CRA evaluation, Wilmington Trust has designated the Dover, Delaware, metropolitan statistical area (Dover MSA) as an assessment area. The Dover MSA encompasses all of Kent County in central Delaware. There are 34 census tracts in this assessment area, of which three are moderate-income, 25 are middle-income and 6 are upper-income. Of the three moderate-income tracts, one is in central Kent County in the city of Dover and two are in southern Kent County in the cities of Harrington and Milford. The moderate-income tracts include both the Dover Air Force Base and Delaware State University. Overall, 9% of the assessment area population resides in moderate-income tracts. There are no low-income tracts in the Dover MSA.

Wilmington Trust's performance was evaluated in terms of the demographic and business context in which it operates. According to the FDIC's Summary of Deposits, as of June 30, 2008, 11 depository institutions operate in the Dover MSA. These institutions maintain a total of 38 branches holding \$1.7 billion in deposits. Wilmington Trust, with 7 branches in the market, ranked 1st, with \$536 million, or 31% of the retail deposit market. PNC Bank Delaware ranks 2nd with 15% of the market. The bank's Dover MSA branches hold approximately 7% of Wilmington Trust's total deposits.

The banking environment in which Wilmington Trust operates is fairly competitive. Large super-regional banks compete with community banks and savings and loan associations. Wilmington Trust's major banking competitors are PNC Bank Delaware, Citizens Bank, and Wachovia Bank Delaware. Local competitors include First National Bank of Wyoming and Wilmington Savings Fund Society.

Wilmington Trust's home mortgage loans were compared to the aggregate of all lenders in the market reporting HMDA loans. These data are reported annually and 2008 is the most recent year for which information was available. The bank ranks 9th with a market share of just 2%, in a market with 248 HMDA reporters. No single financial institution dominates the market. Countrywide Bank FSB ranks 1st with a market share of 14%. Wilmington Trust is the highest ranked Delaware bank.

Among small business lenders, Wilmington Trust ranked 8th in the Dover MSA with 4% of the market. American Express Bank FSB ranked 1st with 18% of the market, although this bank's small business lending includes corporate credit cards. In 2008, the assessment area had a total of 40 small business reporters.

ECONOMIC CHARACTERISTICS

According to 2000 Census data, the population of the Dover MSA was 126,697. From 2000 to 2008, the MSA population increased by 23%, to 155,415. Much of the increase is attributed to the influx of retirees attracted to Dover's lower cost of living, affordable housing, and favorable tax treatment of pension and social security income.

The city of Dover, located in the central part of Kent County, serves as the state capital and, as such, a large portion, but not all, of the state's bureaucracy is located in and around Dover. However, Delaware's capital is not its largest city. Consequently, Wilmington, in the northern part of the state and the largest city, has many state offices and employees one would normally expect to find in the state capital, including the headquarters of the Office of the Attorney General.

A decrease in state government revenues has started a workforce reduction impacting the Dover MSA and the state. Between December 2007 and December 2008, projected net receipts for the fiscal year were down more than 8%. The initial response to this crisis has been a state hiring freeze and a mandatory across-the-board reduction in the operating budget.

Because of the recent cutbacks in state government, Dover's economy is now in a recession. However, the rate of decline is less severe than the state of Delaware and the nation. Strengths of Dover's economy include the Dover Air Force Base's vital role in military logistics; no sales tax; and a sustained out-commuting to the Wilmington metropolitan area. Continued weaknesses include a below average per capita income; below average educational attainment; and a volatile employment base despite a large government presence.

The largest employers in the Dover MSA are the state and county governments. Other major employers in the MSA include the Dover Air Force Base, Delaware Technical and Community College, Bayhealth Medical Center, Perdue Farms, and Comcast of Delmarva. The unemployment rate for the Dover MSA increased to 7.5% as of April 2009, compared to 3.9% a year earlier. Unemployment rates in the assessment area and the state remain lower than the national average of 8.9%.

For comparison purposes, the unemployment rates are presented in the table below.

Locations	April 2009	April 2008
Dover MSA/Kent County	7.5%	3.9%
City of Dover	8.0%	4.5%
State of Delaware	7.5%	3.9%
Nationwide	8.9%	5.0%

HOUSING

According to the 2000 Census, the assessment area contains 50,481 housing units. Single family units comprise 67% of the assessment area's housing units, while mobile homes comprise 18% and multi-family units 11%. Two-to-four family units comprise just 4% of the housing units. Of the total housing units in the MSA, 66% are owner-occupied. In the moderate-income census tracts, 39% of housing units are owner-occupied. This lagged the owner-occupancy levels in middle- and upper-income census tracts of 68% and 66%, respectively. The statewide owner-occupancy rate for Delaware is 63%.

The cost of housing in the Dover MSA is low when compared to other eastern metropolitan areas. The 2000 Census data indicate that the median housing value is \$103,327 in the MSA.

There is a disparity between the median housing value in the area's upper-income census tracts (\$138,968) and that in the moderate-income tracts (\$84,542). The median moderate-income housing value includes the Dover Air Force Base and Delaware State University. The median value in middle-income tracts is \$100,214. Moody's Economy.com estimates that the average existing home price in the Dover MSA was \$205,900 in 2008, compared to \$206,700 in 2007 (a decrease of less than 1%).

Median gross rent in the assessment area is \$573 per month, with 33% of renters paying more than 30% of their income for housing. For the state of Delaware, median gross rent is higher at \$639 per month, with 34% of renters paying more than 30% of income for housing. In the city of Dover, median gross rent is \$595 per month, with 34% paying more than 30% of income for housing.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for residential mortgage lending. In the bank's assessment area, just 5% of owner-occupied units are located in the moderate-income census tracts, 83% are in middle-income tracts, and 12% are in upper-income tracts. Overall, 37% of owner-occupied housing units in the assessment area are located in the city of Dover.

BORROWER INCOME DATA

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon annually adjusted median family income data made available by HUD. According to 2000 Census data, the median family income for the Dover MSA was \$46,505, lower than the state of Delaware at \$55,257. In 2008, the adjusted median family income for the Dover MSA, as reported by HUD, increased to \$55,300.

Of the total families in the Dover MSA assessment area, 19% are designated as low-income and 19% are moderate-income. Families living below the poverty level represent 8% of the total families in the assessment area. In Delaware, 6% of families live below the poverty level.

GEOGRAPHIC BUSINESS DATA

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for small business credit within such census tracts. According to Dun and Bradstreet, 9% of businesses in the assessment area are located in moderate-income tracts. The majority of businesses are located in middle-income tracts (76%), while 15% are in upper-income tracts.

The demographics used to assess the performance context in which Wilmington Trust operates are detailed in the table on the following page.

Wilmington Trust Company Assessment Area Demographics Dover MSA (Kent County, Delaware)								
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	6,325	18.8
Moderate-income	3	8.8	3,008	8.9	291	9.7	6,288	18.7
Middle-income	25	73.5	26,676	79.2	2,201	8.3	7,810	23.2
Upper-income	6	17.6	4,004	11.9	227	5.7	13,265	39.4
Unknown income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	34	100.0	33,688	100.0	2,719	8.1	33,688	100.0
	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	4,483	1,751	5.3	39.1	2,298	51.3	434	9.7
Middle-income	39,934	27,311	82.6	68.4	10,051	25.2	2,572	6.4
Upper-income	6,064	3,986	12.1	65.7	1,827	30.1	251	4.1
Unknown income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	50,481	33,048	100.0	65.5	14,176	28.1	3,257	6.5
	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	506	9.4	452	9.4	37	9.8	17	8.5
Middle-income	4,095	76.1	3,671	76.4	268	71.3	156	78.0
Upper-income	779	14.5	681	14.2	71	18.9	27	13.5
Unknown income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,380	100.0	4,804	100.0	376	100.0	200	100.0
	Percentage of Total Businesses:		89.3	7.0	3.7			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics.

- geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- borrowers' profile, including the distribution of loans to low- and moderate-income borrowers and small businesses;
- overall responsiveness to credit needs of highly economically disadvantaged census tracts, low-income persons, and very small businesses; and
- community development lending activities.

Performance under the lending test is high satisfactory in the Dover MSA.

Geographic Distribution of Loans

The geographic distribution of loans was analyzed to determine the dispersion of the bank's loans among different census tracts within the Dover MSA. The analysis reflected excellent penetration throughout the assessment area, including the moderate-income census tracts.

Home Mortgage Lending

The percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such census tracts. A lower level of owner-occupied units limits lending opportunities in these tracts. A review of Wilmington Trust's mortgage lending activity reflects excellent penetration throughout the Dover MSA.

During the period evaluated, Wilmington Trust made 393 home mortgage loans in the Dover MSA, in an aggregate amount of \$44 million. According to 2000 Census data, 5% of all owner-occupied housing units are located in moderate-income census tracts. By comparison, 9% of Wilmington Trust's home mortgage loans were originated in moderate-income tracts.

Wilmington Trust's home mortgage lending was compared to all other lenders operating in the Dover MSA. An analysis of this data showed that just 4% of all home mortgage loans were made in moderate-income tracts. This comparison shows the bank's lending in the moderate-income census tracts is higher than both the aggregate and owner-occupied housing levels and is considered excellent and supportive of the credit needs of the moderate-income areas of the community. There are no low-income census tracts in the assessment area.

Small Business Lending

Wilmington Trust originated 316 small business loans in the Dover MSA, aggregating \$50.4 million. A comparison of the number of small business loans originated in each type of census tract to the number of businesses located in those tracts demonstrates the bank's commitment to making credit available to its entire community. The bank's extension of credit to these businesses shows that moderate-income census tracts received 5% of small business loans, while 9% of small businesses are located in these census tracts.

Wilmington Trust's small business lending was compared to all other lenders operating in the Dover MSA. An analysis of this data showed that 6% of all small business loans were made in the moderate-income tracts. This level of lending activity by the bank is considered good given the demographics of the assessment area, particularly the limited lending opportunities for any bank operating in the moderate-income tracts. Wilmington Trust has demonstrated consistent performance in moderate-income tracts where its lending is only slightly below aggregate lending and business demographic levels.

Distribution of Loans by Borrower Income Level and Revenue Size of the Business

Home mortgage and small business lending data were analyzed, in conjunction with a review of the demographic and economic characteristics of the assessment area, to determine the extent of lending to borrowers of different income levels and to businesses of different sizes.

Lending to Borrowers of Different Income Levels

An analysis of the distribution of home mortgage loans among retail customers of different income levels, including low- and moderate-income customers, reflects excellent penetration in the Dover MSA. The demographics of the assessment area show that of the 33,688 families in the Dover MSA, 19% are designated as low-income and 19% are moderate-income.

By comparison, 7% of Wilmington Trust's home mortgage loans were originated to low-income borrowers and 19% were to moderate-income borrowers.

An analysis of all lenders operating in the Dover MSA, using 2008 aggregate loan data, shows that only 3% of all home mortgage loans were made to low-income borrowers and 15% were to moderate-income borrowers. This comparison shows that Wilmington Trust performed better than the market with both low- and moderate-income borrowers. In addition, the bank's lending to moderate-income borrowers matched the percentage of these borrowers in the assessment area.

The distribution of loans reflects excellent penetration among retail customers of different income levels, even though the distribution of loans to low-income borrowers does not correspond to the percentage of low-income families in the assessment area. The bank's level of penetration to these borrowers is considered good given the credit needs of the low-income segment of the population can be difficult to address through conventional loan products, presenting a significant obstacle to homeownership. In particular, 33% of renters in the assessment area pay more than 30% of their income for housing, making it difficult to save for a down payment on a house. Obstacles to homeownership also exist for moderate-income families; however, Wilmington Trust's distribution of loans to moderate-income borrowers in the assessment area is excellent.

The bank's participation in innovative and flexible lending programs that address the specific credit needs of low- and moderate-income borrowers enhanced its home mortgage lending profile. Most notably, the bank offers its Affordable Housing Program, a mortgage product for low- and moderate-income borrowers which offers discounted loan rates and flexible underwriting standards, including the use of alternative credit documentation. The program also includes down payment assistance and homeownership counseling.

The bank also offers three Fannie Mae loan products (Flexible 97 Mortgage, Flexible 100 Mortgage, and My Community Mortgage). These products help lenders serve low- and moderate-income borrowers and communities by offering flexible terms and options. All three products are targeted to first-time homebuyers and primarily serve low- and moderate-income homebuyers. Wilmington Trust is also a participating lender in the Delaware State Housing Authority's Single Family Mortgage Revenue Bond Program which provides mortgage financing to low- and moderate-income Delaware homebuyers at below-market interest rates.

During the period evaluated, the bank originated 379 loans, aggregating \$71 million, under these programs. In the Dover MSA, the bank originated 27 of these loans, aggregating \$4.3 million.

The bank uses down payment and settlement assistance programs in conjunction with its innovative and flexible lending products. These programs (Delaware State Housing Authority Second Mortgage Assistance Loan; Live Near Your Work; Delaware Housing Partnership; and the FHLB First Front Door) are designed to provide low- and moderate-income homebuyers with down payment and closing cost assistance. During the period evaluated, 76 homebuyers in the bank's assessment areas received \$405 thousand in matching funds assistance through these programs. In the Dover MSA, four homebuyers received \$17 thousand in matching funds assistance.

Wilmington Trust provided \$2.4 million in funding to DCIC housing loan funds. Of the total funding, \$168 thousand supported two affordable housing projects in Kent County, providing 90 units of affordable housing. The bank also provided \$99 thousand in funding for a group home for low- and moderate-income residents which benefited all of the bank's assessment areas. The portion attributed to Kent County was \$33 thousand, providing 19 units of affordable housing.

Lending to Businesses of Different Sizes

Small business lending data were analyzed to determine the extent of lending to businesses of different sizes, especially small businesses. Of the 316 small business loans originated by the bank during the evaluation period, 61% were extended in an amount of \$100 thousand or less. The number of small business loans originated in smaller amounts is significant because smaller size loans are generally commensurate with the borrowing needs of small businesses. Wilmington Trust's lending activity therefore demonstrates that the bank is meeting the credit needs of small businesses.

The bank's small business lending is further quantified to determine whether loans were made to businesses with gross annual revenues of \$1 million or less. Of the 316 loans originated, 55% were originated to businesses with gross annual revenues of \$1 million or less. By comparison, a review of all lenders in the market shows that 35% of all commercial loans made in the Dover MSA were to businesses with gross annual revenues of \$1 million or less.

Wilmington Trust's participation in innovative and flexible lending programs which address the specific credit needs of small businesses enhanced its small business lending profile. Most notably, the bank participates as a SBA lender. During the period evaluated, the bank originated 81 SBA loans, aggregating \$9.7 million. Twenty five of these loans were made in Kent County.

Wilmington Trust also participates in the FHLB BOB program. BOB assists member financial institutions in providing capital to under-served areas and under-served populations. FHLB member banks make loans to small businesses using a combination of bank financing and BOB funds. During the evaluation period, Wilmington Trust used \$373 thousand in BOB funds to help finance five businesses in the bank's assessment areas. One of these loans was made in Kent County.

Community Development Lending

Wilmington Trust made an adequate level of community development loans in the Dover MSA assessment area. During the time period evaluated, the bank originated one community development loan totaling \$675 thousand for the purchase, refinance, or improvement of a multi-family dwelling located in a moderate-income census tract. This multi-family dwelling provides affordable rental housing alternatives to low- and moderate-income families.

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income census tracts or individuals. The test also considers the innovativeness and complexity of these investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of CRA, the term "qualified investment" includes a lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Performance under the investment test is satisfactory in the Dover MSA assessment area. Of Wilmington Trust's total current investments, 27% are attributed to this assessment area.

Volume of Investment and Grant Activity

A review of investment activity shows that Wilmington Trust has a significant level of qualified community development investments and grants in the Dover MSA. Overall, investments aggregate \$6.6 million. The majority of these investments (78%) support affordable housing, while 21% of investments support economic development and 1% support the provision of community development services.

The bank holds a \$750 thousand investment in a Delaware small business investment company, of which \$250 thousand is attributed to the Dover MSA. The investment promotes economic development by financing small businesses and benefits a broader regional area that includes the bank's assessment areas.

In addition, Wilmington Trust holds 21 equity investments, recognized in previous evaluations, which remain outstanding. These investments, totaling \$18.4 million, support affordable housing for low- and moderate-income residents and small business development across Delaware. Wilmington Trust provided significant financing for these projects which are at times complex investments that help address affordable housing needs in the assessment area. The portion of these investments attributed to the Dover MSA assessment area is \$6.1 million.

In addition to these investments, Wilmington Trust made grants and contributions to various organizations that routinely provide affordable housing, economic development, and community development services that benefit low- and moderate-income individuals and areas. During the period evaluated, the bank made \$55 thousand in qualified grants and donations that benefit the Dover MSA.

Responsiveness to Credit and Community Development Needs

Wilmington Trust was responsive to credit and community development needs through the use of investments to support community development initiatives. The bank's investments support affordable housing in an area with a large number of low- and moderate-income residents and a fast growing senior population.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics.

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms.
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area.
- The reasonableness of business hours and services in meeting assessment area needs.
- The extent to which an institution provides community development services.

Performance under the service test is rated outstanding in the Dover MSA.

Accessibility of Delivery Systems

The bank's delivery systems are readily accessible to all portions of its assessment area. The bank currently operates 7 branches in the Dover MSA. Two branches (29%) are located in moderate-income census tracts. By comparison, 9% of the assessment area population resides in moderate-income census tracts. All of the Kent County branches operate ATMs and have extended evening hours. In addition, five of the seven branches have Saturday hours, including one moderate-income branch.

The following table details the locations of the bank's branches and the population served.

Census Tract	Number of Branches	Percent Branches	Population	Percent Population
Low-income	0	0	0	0
Moderate-income	2	29	11,256	9
Middle-income	3	43	98,434	78
Upper-income	2	28	17,007	13
TOTALS	7	100%	126,697	100%

Alternative Retail Banking Services and Alternative Methods of Delivering Retail Banking Services

To supplement traditional banking services, Wilmington Trust offers telephone banking through its Client Services Center, including deposit account opening, telephone transfers, and bill paying. These services are available Monday through Saturday. The bank also provides "Touch-Tone Banking" 24 hours a day, 7 days a week, where customers can access information on their accounts, transfer money, or pay bills by phone.

The bank offers on-line banking, which allows customers direct access to their accounts at any time via computer. This includes account balance information, bill-pay and stop payment service, and bank to bank transfers at www.wilmingtontrust.com.

Through the bank's partnership with West End Neighborhood House in Wilmington, low- and moderate-income individuals can apply for small dollar loans for a variety of purposes through "Loans Plus", a program established as an affordable alternative to payday lending.

Changes in Branch Locations

To the extent changes have been made, Wilmington Trust's record of opening and closing branches in the Dover MSA has not adversely affected the accessibility of its delivery systems in the moderate-income census tracts, or to low- and moderate-income individuals. Since the previous evaluation, the bank closed its walk-in branch located at 436 W. Glenwood Avenue, Smyrna, Kent County (a middle-income census tract). However, drive-in teller services and an ATM remain at this location. Wilmington Trust also opened a full-service branch at 600 Jimmy Drive, Smyrna, a middle-income census tract.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. Banking services are offered in a uniform and consistent manner among all branches.

Community Development Services

Wilmington Trust is a leader in providing community development services in the Dover MSA. Numerous bank officers and employees participate on loan and finance committees; make presentations for small business development, homeownership seminars, and financial literacy programs; provide credit counseling and technical expertise; and serve in various capacities on boards of community development organizations. The most notable of these include:

- A bank employee serves on the board of directors at NCALL Research, a non-profit housing corporation headquartered in Dover. NCALL specializes in affordable housing development, education and lending.
- A bank officer serves on the loan review committee for West End Neighborhood House, a non-profit organization providing community development services across Delaware, including small dollar affordable loan programs. Wilmington Trust also provides monthly loan report services to West End. Bank staff conducts financial literacy seminars for West End clients.
- In cooperation with the DFLI and the CEEE, Wilmington Trust staff integrated the Bank at School Financial Education Program into 19 elementary and middle schools in Delaware. Bank staff provides classroom instruction on banking services. Six of the schools are located in Kent County, of which four serve primarily low- and moderate-income students. The bank made a significant commitment to revitalize and strengthen the BAS program, including creating metrics to measure program success and strengthen school, teacher, and student participation.

- A bank officer serves on the board of directors, the housing loan fund committee, and the community investment loan fund committee for DCIC. A second bank officer serves on DCIC's planning and personnel committees. Wilmington Trust is a founding member of DCIC.
- A bank employee serves on the board of directors and chairs the loan committee at First State Community Loan Fund, a non-profit community development financial institution that supports small businesses and affordable housing in Delaware.
- A bank officer serves on the board of directors of Interfaith Community Housing, a non-profit affordable housing developer in Delaware. A second employee serves on the corporate advisory council.
- Bank employees made small business development presentations at the Faith Based Financing Opportunities Workshop, a small business workshop sponsored by the SBA in conjunction with Delaware's Faith Based Community.
- Several bank employees made presentations and provided homebuyer counseling for affordable housing organizations, including Interfaith Community Housing, the YWCA, NCALL Research, First State Community Action Agency, Faith-Based Homeownership Initiative, and the Delaware State Housing Authority.
- Wilmington Trust facilitates the operation of a student-run bank (DHS Trust) as part the Academy of Finance at Dover High School. The bank's Dover Branch acts as the correspondent bank and provides equipment and supplies. Dover High School serves central Kent County which includes the city of Dover. Forty two percent of school students are considered low- or moderate-income. The branch is part of "School to Work", an education initiative which targets low- and moderate-income students.

Bank Products

Wilmington Trust offers bank products that give small businesses and low- and moderate-income individuals greater access to banking services. To meet the needs of new or smaller businesses with lower activity and deposit balances, the bank offers a free business checking account with no monthly service fees, no teller charges, and no per check fees. Online banking and bill payment is offered free with this account.

To serve the needs of low- and moderate-income individuals, the bank offers a free checking account with no minimum balance requirement, no monthly maintenance fee, and unlimited check writing. On-line banking and bill payment services are free with this account.

CRA APPENDICES

CRA APPENDIX A: 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.

Block numbering area (“BNA”): A statistical subdivision of a county for grouping and numbering blocks in nonmetropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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

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

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

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

Full review: Performance under the lending, investment and service tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity and responsiveness).

Geography: A census tract or a block numbering area delineated by the U.S. 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 data such as race, gender and income of applications, amount of loan requested, and disposition of the application (for example, 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: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited review: Performance under the lending, investment and service tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Metropolitan area (“MA”): Any primary metropolitan statistical area (“PMSA”), metropolitan statistical area (“MSA”) or consolidated metropolitan statistical area (“CMSA”) as defined by the Office of Management and Budget, with a population of 250 thousand or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income ("Call Report") and the Thrift Financial Reporting ("TFR") instructions. These loans have original amounts of \$1 million or less and typically are either secured by non-farm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by non-farm residential real estate as "small business loans" if the loans are reported on the TFR as non-mortgage, commercial loans.

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

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

CRA APPENDIX B: HMDA LOAN DISTRIBUTION TABLES

WILMINGTON MD (NEW CASTLE COUNTY) HOME MORTGAGE LENDING

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	21	3.1%	3,068	2.3%	69	10.1%	9,314	6.9%
Moderate	196	28.8%	33,474	24.7%	234	34.4%	42,086	31.1%
Low/Moderate Total	217	31.9%	36,542	27.0%	303	44.5%	51,400	37.9%
Middle	286	42.0%	51,081	37.7%	131	19.2%	26,183	19.3%
Upper	178	26.1%	47,882	35.3%	173	25.4%	46,521	34.3%
Unknown	0	0.0%	0	0.0%	74	10.9%	11,401	8.4%
Total	681	100.0%	135,505	100.0%	681	100.0%	135,505	100.0%
	Refinance							
Low	15	3.2%	1,823	2.2%	44	9.3%	4,306	5.3%
Moderate	76	16.1%	7,918	9.7%	94	19.9%	10,642	13.0%
Low/Moderate Total	91	19.2%	9,741	11.9%	138	29.2%	14,948	18.3%
Middle	209	44.2%	32,436	39.6%	102	21.6%	15,164	18.5%
Upper	173	36.6%	39,660	48.5%	202	42.7%	47,711	58.3%
Unknown	0	0.0%	0	0.0%	31	6.6%	4,014	4.9%
Total	473	100.0%	81,837	100.0%	473	100.0%	81,837	100.0%
	Home Improvement							
Low	5	1.1%	183	1.2%	60	13.3%	1,074	7.3%
Moderate	67	14.9%	1,539	10.5%	103	22.8%	2,517	17.2%
Low/Moderate Total	72	16.0%	1,722	11.8%	163	36.1%	3,591	24.5%
Middle	239	53.0%	7,373	50.3%	119	26.4%	3,254	22.2%
Upper	140	31.0%	5,557	37.9%	155	34.4%	6,997	47.8%
Unknown	0	0.0%	0	0.0%	14	3.1%	810	5.5%
Total	451	100.0%	14,652	100.0%	451	100.0%	14,652	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	66.7%	2,269	71.9%	0	0.0%	0	0.0%
Low/Moderate Total	4	66.7%	2,269	71.9%	0	0.0%	0	0.0%
Middle	2	33.3%	888	28.1%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	6	100.0%	3,157	100.0%
Total	6	100.0%	3,157	100.0%	6	100.0%	3,157	100.0%
	HMDA Totals							
Low	41	2.5%	5,074	2.2%	173	10.7%	14,694	6.2%
Moderate	343	21.3%	45,200	19.2%	431	26.8%	55,245	23.5%
Low/Moderate Total	384	23.8%	50,274	21.4%	604	37.5%	69,939	29.7%
Middle	736	45.7%	91,778	39.0%	352	21.8%	44,601	19.0%
Upper	491	30.5%	93,099	39.6%	530	32.9%	101,229	43.0%
Unknown	0	0.0%	0	0.0%	125	7.8%	19,382	8.2%
Total	1,611	100.0%	235,151	100.0%	1,611	100.0%	235,151	100.0%

WILMINGTON MD (NEW CASTLE COUNTY) SMALL BUSINESS LENDING

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	107	9.9%	17,649	9.4%	0	0.0%	0	0.0%
Moderate	190	17.5%	36,576	19.5%	0	0.0%	0	0.0%
Low/Moderate Total	297	27.3%	54,225	28.9%	0	0.0%	0	0.0%
Middle	448	41.3%	79,124	42.2%	0	0.0%	0	0.0%
Upper	339	31.2%	53,451	28.5%	0	0.0%	0	0.0%
Unknown	2	0.2%	600	0.3%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,086	100.0%	187,400	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	545	50.2%	94,593	50.5%	0	0.0%	0	0.0%
Over \$1 Million	367	33.8%	90,765	48.4%	0	0.0%	0	0.0%
Not Known	174	16.0%	2,042	1.1%	0	0.0%	0	0.0%
Total	1,086	100.0%	187,400	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	626	57.6%	21,642	11.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	231	21.3%	43,370	23.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	229	21.1%	122,388	65.3%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,086	100.0%	187,400	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	290	53.2%	12,280	13.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	143	26.2%	27,059	28.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	112	20.6%	55,254	58.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	545	100.0%	94,593	100.0%	0	0.0%	0	0.0%

SUSSEX COUNTY HOME MORTGAGE LENDING

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	10	7.4%	995	3.8%
Moderate	0	0.0%	0	0.0%	37	27.2%	5,130	19.7%
Low/Moderate Total	0	0.0%	0	0.0%	47	34.6%	6,125	23.5%
Middle	123	90.4%	20,043	76.9%	21	15.4%	2,559	9.8%
Upper	13	9.6%	6,019	23.1%	59	43.4%	15,299	58.7%
Unknown	0	0.0%	0	0.0%	9	6.6%	2,079	8.0%
Total	136	100.0%	26,062	100.0%	136	100.0%	26,062	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	13	4.0%	1,087	1.9%
Moderate	0	0.0%	0	0.0%	74	22.6%	6,772	12.0%
Low/Moderate Total	0	0.0%	0	0.0%	87	26.5%	7,859	14.0%
Middle	295	89.9%	46,146	82.0%	76	23.2%	8,704	15.5%
Upper	33	10.1%	10,161	18.0%	165	50.3%	39,744	70.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	328	100.0%	56,307	100.0%	328	100.0%	56,307	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	33	9.9%	802	5.8%
Moderate	0	0.0%	0	0.0%	68	20.3%	1,414	10.2%
Low/Moderate Total	0	0.0%	0	0.0%	101	30.1%	2,216	15.9%
Middle	327	97.6%	11,478	82.6%	76	22.7%	2,312	16.6%
Upper	8	2.4%	2,416	17.4%	156	46.6%	7,058	50.8%
Unknown	0	0.0%	0	0.0%	2	0.6%	2,308	16.6%
Total	335	100.0%	13,894	100.0%	335	100.0%	13,894	100.0%
	Multi-Family							
Low	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%
Low/Moderate Total	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%
Upper	1	100.0%	4	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	4	100.0%
Total	1	100.0%	4	100.0%	1	100.0%	4	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	56	7.0%	2,884	3.0%
Moderate	0	0.0%	0	0.0%	179	22.4%	13,316	13.8%
Low/Moderate Total	0	0.0%	0	0.0%	235	29.4%	16,200	16.8%
Middle	745	93.1%	77,667	80.7%	173	21.6%	13,575	14.1%
Upper	55	6.9%	18,600	19.3%	380	47.5%	62,101	64.5%
Unknown	0	0.0%	0	0.0%	12	1.5%	4,391	4.6%
Total	800	100.0%	96,267	100.0%	800	100.0%	96,267	100.0%

SUSSEX COUNTY SMALL BUSINESS LENDING

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	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%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	357	86.2%	48,506	81.5%	19	100.0%	2,857	100.0%
Upper	57	13.8%	11,043	18.5%	0	0.0%	0	0.0%
Unknown	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%
Total	414	100.0%	59,549	100.0%	19	100.0%	2,857	100.0%
By Revenue								
Total \$1 Million or Less	232	56.0%	32,327	54.3%	17	89.5%	2,057	72.0%
Over \$1 Million	88	21.3%	26,260	44.1%	2	10.5%	800	28.0%
Not Known	94	22.7%	962	1.6%	0	0.0%	0	0.0%
Total	414	100.0%	59,549	100.0%	19	100.0%	2,857	100.0%
By Loan Size								
\$100,000 or less	277	66.9%	8,479	14.2%	10	52.6%	460	16.1%
\$100,001 - \$250,000	64	15.5%	11,815	19.8%	5	26.3%	782	27.4%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	73	17.6%	39,255	65.9%	4	21.1%	1,615	56.5%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	414	100.0%	59,549	100.0%	19	100.0%	2,857	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	155	66.8%	5,842	18.1%	10	58.8%	460	22.4%
\$100,001 - \$250,000	38	16.4%	6,871	21.3%	5	29.4%	782	38.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	39	16.8%	19,614	60.7%	2	11.8%	815	39.6%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	232	100.0%	32,327	100.0%	17	100.0%	2,057	100.0%

DOVER MSA (KENT COUNTY) HOME MORTGAGE LENDING

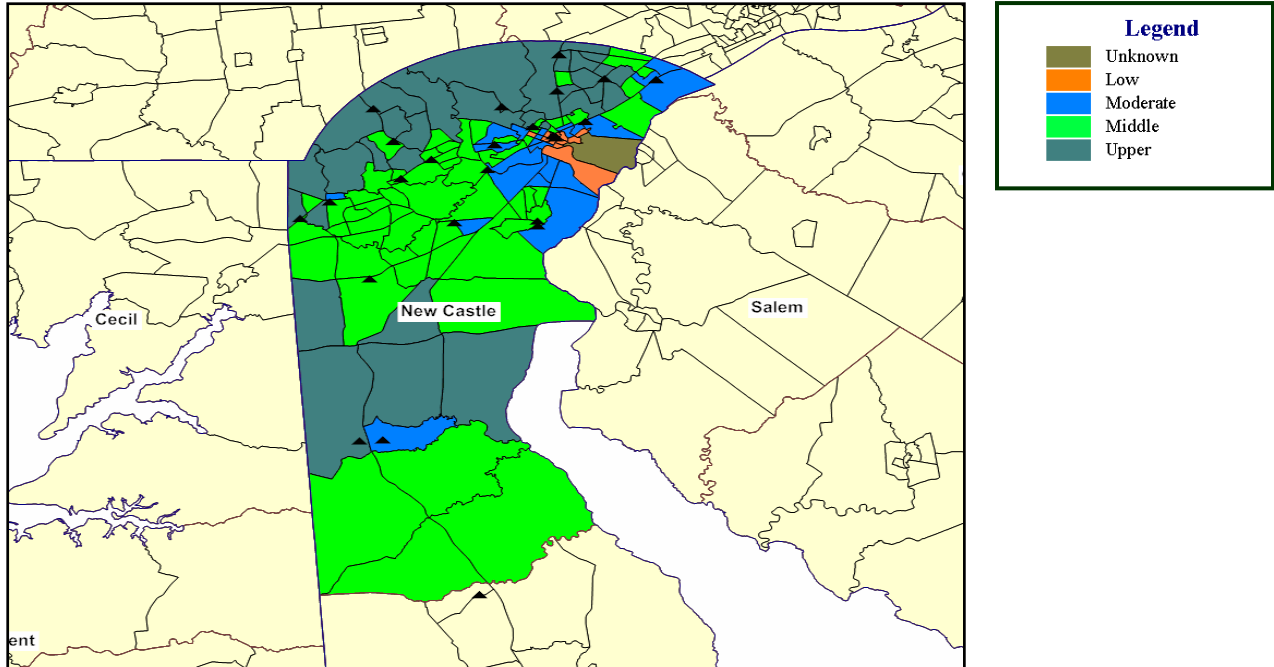
Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	7	7.1%	578	3.6%
Moderate	12	12.1%	1,640	10.4%	25	25.3%	3,069	19.4%
Low/Moderate Total	12	12.1%	1,640	10.4%	32	32.3%	3,647	23.0%
Middle	81	81.8%	12,963	81.8%	19	19.2%	3,198	20.2%
Upper	6	6.1%	1,237	7.8%	30	30.3%	5,491	34.7%
Unknown	0	0.0%	0	0.0%	18	18.2%	3,504	22.1%
Total	99	100.0%	15,840	100.0%	99	100.0%	15,840	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	6	4.5%	489	2.2%
Moderate	10	7.6%	811	3.7%	22	16.7%	2,638	11.9%
Low/Moderate Total	10	7.6%	811	3.7%	28	21.2%	3,127	14.2%
Middle	104	78.8%	15,373	69.6%	29	22.0%	2,983	13.5%
Upper	18	13.6%	5,908	26.7%	72	54.5%	12,598	57.0%
Unknown	0	0.0%	0	0.0%	3	2.3%	3,384	15.3%
Total	132	100.0%	22,092	100.0%	132	100.0%	22,092	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	15	9.3%	331	6.5%
Moderate	11	6.8%	314	6.2%	26	16.1%	539	10.6%
Low/Moderate Total	11	6.8%	314	6.2%	41	25.5%	870	17.2%
Middle	132	82.0%	4,264	84.2%	52	32.3%	1,377	27.2%
Upper	18	11.2%	485	9.6%	66	41.0%	2,744	54.2%
Unknown	0	0.0%	0	0.0%	2	1.2%	72	1.4%
Total	161	100.0%	5,063	100.0%	161	100.0%	5,063	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	675	100.0%	0	0.0%	0	0.0%
Low/Moderate Total	1	100.0%	675	100.0%	0	0.0%	0	0.0%
Middle	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%
Unknown	0	0.0%	0	0.0%	1	100.0%	675	100.0%
Total	1	100.0%	675	100.0%	1	100.0%	675	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	28	7.1%	1,398	3.2%
Moderate	34	8.7%	3,440	7.9%	73	18.6%	6,246	14.3%
Low/Moderate Total	34	8.7%	3,440	7.9%	101	25.7%	7,644	17.5%
Middle	317	80.7%	32,600	74.7%	100	25.4%	7,558	17.3%
Upper	42	10.7%	7,630	17.5%	168	42.7%	20,833	47.7%
Unknown	0	0.0%	0	0.0%	24	6.1%	7,635	17.5%
Total	393	100.0%	43,670	100.0%	393	100.0%	43,670	100.0%

DOVER MSA (KENT COUNTY) SMALL BUSINESS LENDING

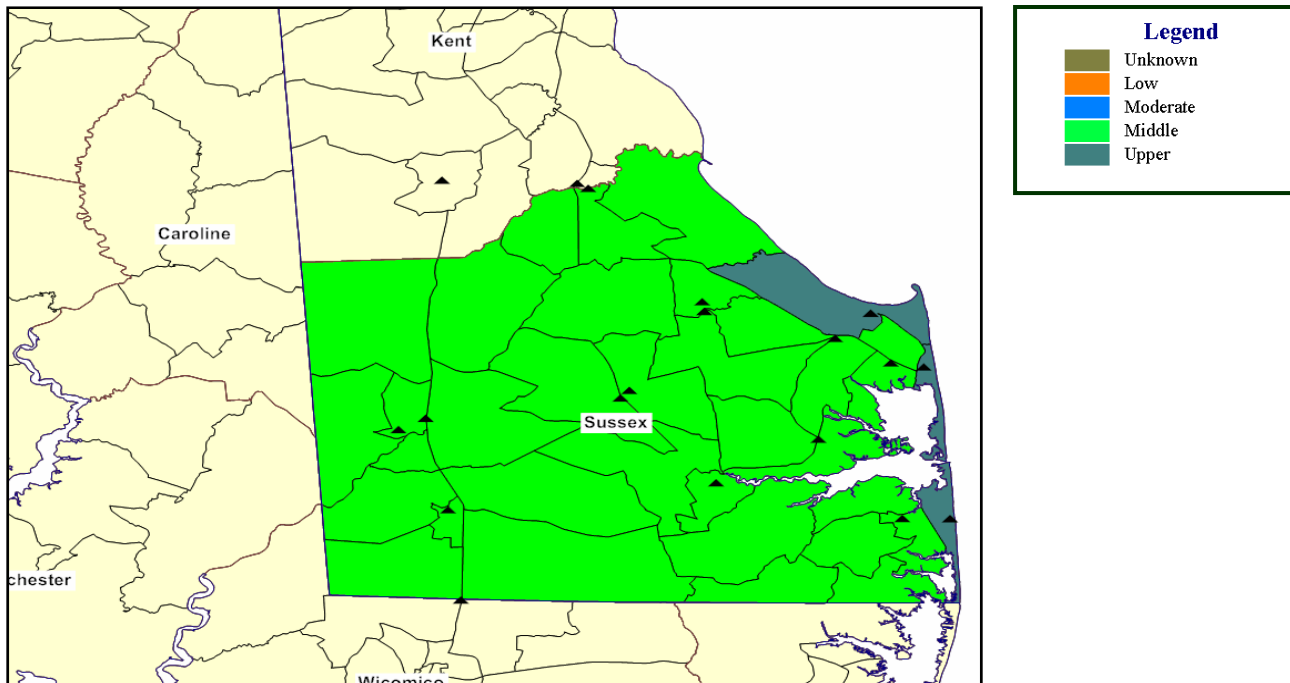
	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	17	5.4%	2,669	5.3%	0	0.0%	0	0.0%
Low/Moderate Total	17	5.4%	2,669	5.3%	0	0.0%	0	0.0%
Middle	257	81.3%	40,861	81.1%	7	100.0%	554	100.0%
Upper	42	13.3%	6,869	13.6%	0	0.0%	0	0.0%
Unknown	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%
Total	316	100.0%	50,399	100.0%	7	100.0%	554	100.0%
By Revenue								
Total \$1 Million or Less	175	55.4%	29,622	58.8%	7	100.0%	554	100.0%
Over \$1 Million	89	28.2%	20,146	40.0%	0	0.0%	0	0.0%
Not Known	52	16.5%	631	1.3%	0	0.0%	0	0.0%
Total	316	100.0%	50,399	100.0%	7	100.0%	554	100.0%
By Loan Size								
\$100,000 or less	192	60.8%	6,487	12.9%	5	71.4%	263	47.5%
\$100,001 - \$250,000	64	20.3%	12,131	24.1%	2	28.6%	291	52.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	60	19.0%	31,781	63.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	316	100.0%	50,399	100.0%	7	100.0%	554	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	99	56.6%	3,874	13.1%	5	71.4%	263	47.5%
\$100,001 - \$250,000	41	23.4%	7,839	26.5%	2	28.6%	291	52.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	35	20.0%	17,909	60.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	175	100.0%	29,622	100.0%	7	100.0%	554	100.0%

CRA APPENDIX C: ASSESSMENT AREA MAPS

Wilmington MD



Sussex County Non-Metropolitan Area



Dover MSA

