

PUBLIC DISCLOSURE

May 7, 2007

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**WILMINGTON TRUST OF PENNSYLVANIA
RSSD ID – 551315**

VILLANOVA, PENNSYLVANIA

**Federal Reserve Bank of Philadelphia
Ten Independence Mall, Philadelphia, Pennsylvania**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S RATING

INSTITUTION'S CRA RATING

Wilmington Trust of Pennsylvania is rated **OUTSTANDING**.

TABLE OF PERFORMANCE TEST RATINGS

The following table indicates the performance level of Wilmington Trust of Pennsylvania 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.

The major factors supporting the institution's rating include:

- 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 uses innovative and flexible lending practices in order to serve assessment area credit needs;
- 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 an excellent level of qualified community development investments and grants, exhibiting excellent responsiveness to community development needs; and
- the bank is a leader in providing community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Wilmington Trust of Pennsylvania (WTPA), headquartered in Villanova, PA, is a state chartered full-service commercial bank. Through four branches located in the Philadelphia metropolitan division (MD), the bank offers a variety of consumer and commercial banking services. The bank's business strategy focuses on commercial lending, private banking, and personal trust activities versus aggressively competing for traditional retail banking services. The bank's target markets are privately held businesses with \$5 million to \$250 million in sales; professionals; and high net worth individuals and families.

The bank's branches are referred to as Financial Advisory Centers. While customer service representatives are available at each office to complete retail banking transactions, the offices are structured and staffed primarily to meet the needs of the bank's commercial, private banking, and trust customers.

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

Metropolitan Area	County	Number of Branches
Philadelphia MD	Delaware County	1
Philadelphia MD	Philadelphia County	1
Philadelphia MD	Bucks County	1
Philadelphia MD	Chester County	1
Total Branches		4

WTPA is a subsidiary of Wilmington Trust Corporation (WTC), a financial holding company with assets of \$11 billion as of March 31, 2007. In addition to WTPA, WTC has a bank subsidiary, Wilmington Trust Company located in Wilmington, DE, and a thrift subsidiary, Wilmington Trust FSB (WTFSB), located in Baltimore, MD. WTC is headquartered in Wilmington, DE, and is one of the largest personal trust administrators in the country.

As of March 31, 2007, WTPA reported total assets of \$1.2 billion, of which \$636 million, or 53%, 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 are loans secured by residential property. Collectively these loan types represented approximately 77% of the total loan portfolio.

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

LOANS as of 03/31/2007	\$000	%
Construction & Land Development	52,568	8.3
Open-End Loans Secured by Residential Properties ¹	43,647	6.9
Closed-End Secured by Residential Property ¹	92,598	14.6
Secured by Multifamily Residential Property ¹	2,891	0.5
Commercial Mortgages	144,439	22.7
Commercial and Industrial	208,606	32.8
Consumer Installment	86,107	13.5
Other Loans	5,241	0.8
GROSS LOANS	\$636,097	100%

Source: Report of Condition and Income for the period ending March 31, 2007 (Schedule RC-C)

DESCRIPTION OF ASSESSMENT AREA

For purposes of CRA, WTPA has designated its assessment area as including all of Chester, Delaware, Montgomery, Bucks and Philadelphia counties in Pennsylvania. The assessment area is situated in southeastern Pennsylvania and comprises the Philadelphia Metropolitan Division (MD). According to year 2000 census data, the area's total population was 3,849,647.

The Philadelphia MD, particularly Philadelphia and Delaware counties, has a significant number of low- and moderate-income geographies and families. Low- and moderate-income geographies account for 32% of the assessment area's total geographies and 33% of the assessment area population resides within those geographies. The majority of the low- and moderate-income geographies are located within the city of Philadelphia. The assessment area's other low- and moderate-income geographies are situated primarily in the City of Chester, Chester Township, Upper Darby Township, Collingdale, and Darby Borough in Delaware County; Croydon and Bristol Borough in Bucks County; Coatesville, West Chester Borough, and Spring City in Chester County; and the cities of Norristown and Pottstown in Montgomery County. Next to Philadelphia, the city of Chester has the greatest number of low- and moderate-income geographies.

The bank's assessment area was determined to comply with the requirements of the CRA and does not arbitrarily exclude low- or moderate-income geographies. The bank's asset size and financial condition indicate that it has the ability to effectively meet the credit needs of its assessment area. There are no legal or other impediments that would hamper the bank's ability to meet community credit needs.

SCOPE OF EXAMINATION

The examination of WTPA's CRA performance was evaluated for the period from November 1, 2004 through May 7, 2007. 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 included home purchase loans and refinancing of

¹ It should be noted that the loans classified as secured by residential property are not necessarily residential mortgage loans.

such loans, and home improvement loans (collectively titled HMDA Loans), small business loans, and other loans that qualified as community development loans.

The HMDA and small business loan data reviewed for purposes of this evaluation covered the period from January 1, 2005 through December 31, 2006. WTPA's HMDA and small business loans were compared to the aggregate of all lenders in the bank's assessment area reporting loans pursuant to HMDA, and small business loans pursuant to CRA. This data is reported annually, and the most recent year for which information is available is 2005.

For purposes of evaluating the geographic distribution of loans, census tracts were classified on the basis of year 2000 U.S. Census data. The distribution of loans to borrowers of different income levels was based upon annually adjusted median family income data made available by U.S. Department of Housing and Urban Development (HUD). The most recent year for which median family income data is available is 2006. All other demographic indices and statistics presented throughout this evaluation are based on year 2000 U.S. Census data unless otherwise noted.

COMPLIANCE WITH FAIR LENDING LAWS

No credit practices were identified that violate the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act (Regulation B), the Fair Housing Act, and the Home Mortgage Disclosure Act (Regulation C), or any other relevant agency regulations pertaining to the nondiscriminatory treatment of credit applicants.

DESCRIPTION OF INSTITUTION'S OPERATIONS

WTPA's performance in the assessment area was evaluated in terms of the demographic and business context in which the bank operates. The Philadelphia MD is a very competitive market for financial institutions and is dominated by large regional and super-regional institutions, mortgage companies and aggressive community banks. WTPA operates four branches in the assessment area. Based on deposits reported to the Federal Deposit Insurance Corporation (FDIC) as of June 30, 2006², these four branches contain approximately \$269 million in deposits, which ranks the bank 41st in the assessment area, controlling just 0.3% of the retail deposit market share.

Regarding HMDA loans in 2005, the latest year for which data is available, WTPA ranks 217th in the assessment area with only 0.03% of all such loan originations and purchases. The market is dominated by mortgage companies and mortgage subsidiaries of large banks, including Countrywide Home Loans (8%), Wells Fargo Bank NA (4.6%), and Wachovia Bank NA (3.5%).

Regarding small business lenders, WTPA ranks 30th among lenders operating in the assessment area in 2005. This market is dominated by Citibank USA NA, Bank of America, and Capital One FSB, which combined accounts for 47% of all small-business loans. WTPA reported 0.2% of small business loans in the assessment area.

² June 30, 2006 is the most recent date for which FDIC deposit data is available.

HOUSING

According to the year 2000 Census, the assessment area contained 1,565,641 housing units, of which 64% were owner-occupied and 29% were rental units. In low- and moderate-income geographies, the level of owner-occupancy was 50%, while rental units account for 38% of all housing. Single family units comprise 73% of total housing units, two-to-four family units comprised 10% of the total housing units, while multi-family units comprised 16%.

The median housing value in the assessment area was \$119,551, considerably higher than the state median value of \$94,800. Of the total owner-occupied housing units in the assessment area, 41% are valued at less than \$100 thousand, indicating that housing in the bank's assessment area is less affordable than housing in the state as a whole, where 54% of housing units are valued at less than \$100 thousand. There is a significant disparity between median housing values in upper-income geographies (\$191,526) from that in moderate-income (\$58,268) and low-income (\$33,444) geographies. Despite the lower housing costs, owner-occupancy in low- and moderate-income geographies was 42% and 54%, respectively, compared to levels of 65% in middle-income geographies and 77% in upper-income geographies.

The median age of the housing stock is 46 years, compared to a median age of 43 years in the state. Median rent in the assessment area is \$642, with 39% of renters paying more than 30% of their income for housing. Median rent in the state is \$531, with 35% of renters paying more than 30% of their income for housing.

The percentage of owner-occupied housing units contained within designated geographies is used as a proxy to estimate demand for residential mortgage lending within such geographies. This analysis shows that the majority of owner-occupied housing units (73%) are located in the middle- and upper-income geographies. Meanwhile, 9% of all owner-occupied units are located in the assessment area's low-income geographies, and 18% in moderate-income geographies.

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 year 2000 Census data, the median family income for the assessment area was \$56,993 compared to \$49,184 for the state. The adjusted median family income for the Philadelphia MD, as reported by HUD, increased to \$69,800 for 2006.

Of the total families in the bank's assessment area, 22% are designated as low-income and 17% are moderate-income. More than half of these families (53%) live in low- and moderate-income geographies. Families living below the poverty level³ represented 9% of the total families in the assessment area. In the state of Pennsylvania 8% of families live below the poverty level.

³ Based on the definition prescribed by the Federal Office of Management and Budget.

GEOGRAPHIC BUSINESS DATA

The percentage of businesses located within designated geographies is used as a proxy to estimate demand for business credit within such geographies. According to business demographics, there are 131,655 businesses located in WTPA's assessment area, of which 113,335 or 86% are classified as small businesses (a business with gross annual revenues of \$1 million or less).

Of these small businesses, 24,469, or 22%, are located in low- and moderate-income geographies. The substantial majority of small businesses (78%) are located in middle- and upper-income geographies.

ECONOMIC CHARACTERISTICS

Philadelphia is the largest city in Pennsylvania and the fifth largest city in the nation with a population of 1.51 million, according to the year 2000 Census. The traditional economic base of the city has been manufacturing; however, because of plant closures, the majority of the local work force is now service-oriented. Healthcare is the most active segment of the economy. The top five private sector employers in the Philadelphia MSA are the University of Pennsylvania, Jefferson Health System, Merck and Company, Boeing Corporation and The Vanguard Group. The banking environment in which WTPA operates is highly competitive and dominated by large regional banking organizations, mortgage companies and aggressive community banks.

The area's strengths continue to be a concentration of well-regarded educational institutions, its position as a center for health services and medical research, relatively affordable housing and living costs, and a well developed port. However, the area has a lower per capita income than other large northeastern metropolitan areas and weak population growth.

In February 2004, the Consumer and Community Affairs Department of the Federal Reserve Bank of Philadelphia published a report titled Community Profile: Pennsylvania Counties of the Philadelphia Metropolitan Statistical Area. The report provides information and insights into the perceived credit needs and opportunities in the Philadelphia MSA. Information in the report was obtained from interviews and contacts with bankers, community organizations, and local government officials. Contacts throughout the assessment area agreed that affordable housing is one of the most pressing needs. The high cost of housing in the suburban counties significantly limits homeownership opportunities for low- and moderate-income families in the assessment area. The disparity between incomes and housing costs, either owned or rented, suggests a need for loan programs targeted at low- and moderate-income families and first-time homebuyers. Contacts also noted a need for the development of rental properties for the low- and moderate-income population.

In addition, housing stock in the Philadelphia MD tends to be older, with a median age of 45 years. Overall, 41% of housing in the MD and 58% of housing in the city of Philadelphia was built before 1950. This aging housing stock indicates an increasing need for home improvement loans.

The following table details assessment area demographics for WTPA.

Wilmington Trust of Pennsylvania Assessment Area Demographics Philadelphia, MD								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	121	12.3	106,763	11.0	36,963	34.6	213,330	22.0
Moderate-income	192	19.5	191,983	19.8	29,687	15.5	165,684	17.1
Middle-income	326	33.0	314,019	32.4	14,362	4.6	198,297	20.4
Upper-income	330	33.4	357,640	36.9	6,414	1.8	393,094	40.5
Unknown-income	18	1.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	987	100.0	970,405	100.0	87,426	9.0	970,405	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	198,378	86,598	8.7	43.7	76,495	38.6	35,285	17.8
Moderate-income	343,642	184,001	18.4	53.5	126,901	36.9	32,740	9.5
Middle-income	507,473	330,999	33.2	65.2	154,505	30.4	21,969	4.3
Upper-income	515,795	396,247	39.7	76.8	103,358	20.0	16,190	3.1
Unknown-income	353	13	0.0	3.7	2	0.6	338	95.8
Total Assessment Area	1,565,641	997,858	100.0	63.7	461,261	29.5	106,522	6.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	9,281	7.0	8,066	7.1	921	6.0	294	9.8
Moderate-income	18,999	14.4	16,403	14.5	2,089	13.6	507	16.9
Middle-income	40,904	31.1	35,367	31.2	4,651	30.4	886	29.5
Upper-income	61,602	46.8	52,925	46.7	7,381	48.2	1,296	43.1
Unknown-income	869	0.7	574	0.5	271	1.8	24	0.8
Total Assessment Area	131,655	100.0	113,335	100.0	15,313	100.0	3,007	100.0
	Percentage of Total Businesses:			86.1		11.6		2.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	8	0.8	7	0.8	1	1.5	0	0.0
Moderate-income	29	3.0	27	3.1	2	2.9	0	0.0
Middle-income	411	43.1	387	44.3	21	30.9	3	27.3
Upper-income	505	53.0	453	51.8	44	64.7	8	72.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	953	100.0	874	100.0	68	100.0	11	100.0
	Percentage of Total Farms:			91.7		7.1		1.2

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities within a given assessment area with respect to the following characteristics:

- overall lending levels and assessment area concentration;
- geographic distribution of loans, including loans originated in low- and moderate-income geographies;
- borrowers' profile or characteristics, irrespective of geography, including 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;
- community development lending activities; and
- product innovation (defined as the use of innovative or flexible lending practices to address community credit needs).

Performance under the lending test is assessed as outstanding.

Lending Activity

Bank lending levels reflect adequate responsiveness to assessment area credit needs. As of March 31, 2007, net loans represented 52% of total assets, compared to the bank's national peer group average of 71%⁴. Loan growth over the past two years has remained relatively flat. Asset growth continues to be fueled by increases in investment securities.

WTPA's loan-to-deposit ratio was 271%, compared to the peer group average of 91%. The high level of loans in relation to deposits is attributable to the bank's unique funding structure which has a significant reliance on deposits.

The bank's home mortgage, small business and small farm loans were analyzed to determine the volume of loans extended inside and outside of the bank's assessment areas. The analysis revealed that a substantial majority of the bank's home mortgage and small business loans were made within the bank's assessment area.

The table on the following page shows WTPA's HMDA and small business lending activity for 2005 and 2006.

⁴ WTPA's peer group includes all insured commercial banks having assets between \$1 billion and \$3 billion.

Exhibit #2								
Wilmington Trust of Pennsylvania								
Lending Inside and Outside the Assessment Area								
	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	5	83.3	835	97.7	1	16.7	20	2.3
Home Purchase - Conventional	76	98.7	13,722	91.8	1	1.3	1,220	8.2
Multi-Family Housing	4	100.0	886	100.0	0	0.0	0	0.0
Refinancing	57	100.0	8,244	100.0	0	0.0	0	0.0
Total HMDA related	142	98.6	23,687	95.0	2	1.4	1,240	5.0
Small Business	360	87.8	119,380	88.6	50	12.2	15,385	11.4
Total Small Business. related	360	87.8	119,380	88.6	50	12.2	15,385	11.4
TOTAL LOANS	502	90.6	\$143,067	89.6	52	9.4	\$16,625	10.4

Geographic Distribution

Home Mortgage Lending

An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among different geographies within the bank's assessment area. The analysis reflected excellent penetration throughout the assessment area, including low- and moderate-income geographies. The information used to evaluate the geographic distribution of the bank's HMDA lending is detailed in the **LOAN DISTRIBUTION TABLE** in Appendix B of this Evaluation.

WTPA does not ordinarily originate residential mortgages loans because of its business strategy of providing services to privately held businesses with \$5 million to \$250 million in sales, professionals, and high net worth individuals and families. Generally, the bank makes residential mortgage loans on an accommodation basis to its private banking, trust, and commercial customers. However, acknowledging its CRA commitment, the bank offers a residential mortgage product targeted to low- and moderate-income borrowers and continues its practice of purchasing residential mortgage loans originated in low- and moderate-income geographies or to low- and moderate-income borrowers. In 2005 and 2006, WTPA reported 142 HMDA reportable loans in its assessment area (133 home purchase and refinance mortgages, five home improvement and four multi-family).

Despite the bank's limited number of HMDA reportable loans, WTPA's home mortgage loan data clearly indicates that the bank has effectively penetrated low- and moderate-income geographies within its assessment area. In 2005 and 2006, 33% of the bank's HMDA reportable loans were originated in low- or moderate-income geographies. These lending levels are notable given the limited amount of available owner-occupied housing units in the assessment area's low- and moderate-income geographies.

The percentage of owner-occupied housing units contained within designated geographies is used as a proxy to estimate demand for residential mortgage lending within such geographies. A lower level of owner-occupied units limits the lending opportunities in these geographies.

In WTPA's assessment area, the majority of owner-occupied housing units (73%) are located in middle- and upper-income geographies. Approximately 27% of all owner-occupied units are located in low- or moderate-income geographies in the assessment area.

Geographic Distribution in Relation to Market Performance

An analysis of aggregate lending in the low-income geographies of the assessment area reveals modest lending levels for most institutions, including WTPA, in those geographies. While 9% of all owner-occupied housing units are located in the assessment area's low-income geographies, 3% of WTPA's HMDA loans were originated in low-income geographies and 6% of all HMDA loans made in the assessment area were originated in low-income geographies.

By comparison, WTPA performed significantly better than aggregate levels in moderate-income geographies. While 18% of all owner-occupied housing units are located in the assessment area's moderate-income geographies, 30% of WTPA's HMDA loans were originated in moderate-income geographies and 19% of all HMDA loans in the assessment area were originated in moderate-income geographies.

Small Business Lending

An analysis of the geographic distribution of small business loans was conducted in an effort to determine the dispersion of these loans among different geographies within the bank's assessment area. The analysis reflected excellent penetration throughout the assessment area, including low- and moderate-income geographies. The information used to evaluate the geographic distribution of the bank's small business lending is detailed in the **LOAN DISTRIBUTION TABLES** located in Appendix B of this Evaluation.

In 2005 and 2006, WTPA originated 360 small business loans in its assessment area, in an aggregate amount of \$119 million. When comparing the number of small business loans originated in each type of geography to the number of small businesses located in each type of geography, the bank's commitment to making credit available to its entire community is evident.

Business demographics revealed that there were a total of 113,655 businesses within WTPA's assessment area. WTPA's extension of credit to these businesses shows that low-income geographies received 5% of small business loans, while 7% of businesses are located in these geographies. Moderate-income geographies received 11% of small business loans, while 14% of businesses are located in these geographies. Middle-income geographies received 25% of small business loans for their 31% share of businesses. Upper-income geographies received 59% of small business loans for their 47% of small businesses.

Despite WTPA's business focus on medium and large-size businesses, the bank's geographic distribution of small business lending is nearly analogous to the distribution of small businesses in the assessment area.

Geographic Distribution in Relation to Market Performance

An analysis of aggregate lending in low-income geographies reveals that while 7% of businesses are located in the assessment area's low-income geographies, 5% of WTPA's small business loans and 4% of aggregate small business loans made in the assessment area were originated in those geographies. Furthermore, aggregate lending in moderate-income geographies reveals that 14% of businesses are located in moderate-income geographies. However, 11% of WTPA's small business loans and 12% of all small business loans made in the assessment area were originated in those geographies. This data reveals that WTPA's geographic distribution of small business lending is nearly identical to the distribution of other small business lenders in its assessment area.

Distribution by Borrower Income and Revenue Size of the Business

An analysis of HMDA and small business lending data was conducted in conjunction with a review of the demographic and economic characteristics of the assessment area to ascertain the extent of lending to borrowers of different income levels and to businesses of different sizes. The information used to evaluate the distribution of the bank's lending by borrower income is detailed in the **LOAN DISTRIBUTION TABLES** located in Appendix B of this Evaluation.

Lending to Borrowers of Different Income Levels

WTPA's distribution of loans reflects excellent penetration among retail customers of different income levels. An analysis of the distribution of home mortgage loans to both low- and moderate-income borrowers, in comparison to the demographics of the assessment area, shows that 39% of the families in the assessment area are designated as low- or moderate-income. During the evaluation period, 67% of the bank's HMDA loans were to low- or moderate-income families.

Borrower Distribution in Relation to Market Performance

An analysis of aggregate HMDA lending shows that WTPA performed significantly better than the aggregate in lending to both low- and moderate-income borrowers in the assessment area. While 22% of families in the assessment area are designated as low-income, 23% of WTPA's HMDA loans were originated to low-income borrowers and only 7% of aggregate HMDA loans were to low-income borrowers. Moreover, while 17% of families are designated as moderate-income, 44% of WTPA's HMDA loans were originated to moderate-income borrowers and 18% of aggregate HMDA loans were to moderate-income borrowers.

To enhance its efforts to address the credit needs of the low- and moderate-income segment of the assessment area population, WTPA participates in affordable housing programs and has made several qualified community development investments. For a more detailed discussion of these efforts, refer to the **INVESTMENT TEST** (page 14) and **SERVICE TEST** (page 15) sections of this Evaluation.

Lending to Businesses of Different Sizes

An analysis of the distribution of loans to businesses determined that WTPA's lending to small businesses is consistent with the institution's asset size, lending capacity, and business objectives, and reflects good penetration among businesses of different sizes. The information used to evaluate the bank's lending performance is detailed in the **LOAN DISTRIBUTION TABLES** located in Appendix B of this Evaluation.

For the purpose of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of \$1 million or less. 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, 2006, indicates that 41% of the bank's commercial loans were designated as small business loans, as detailed in the following chart. The dollar volume of WTPA's small business lending is significant because the bank's target business customer is medium and large-size businesses.

WILMINGTON TRUST OF PENNSYLVANIA COMMERCIAL LOAN PORTFOLIO		
	AMOUNT OUTSTANDING AS OF 6/30/2006 (\$000)	PERCENT
Loans with original amounts of \$100,000 or less	9,900	3%
Loans with original amounts of more than \$100,000 through \$250,000	18,625	6%
Loans with original amounts of more than \$250,000 through \$1,000,000	101,846	32%
TOTAL SMALL BUSINESS LOANS	130,371	41%
Loans with original amounts of greater than \$1,000,000	187,781	59%
TOTAL COMMERCIAL LOANS	\$318,152	100%

Of the 360 small business loans originated by the bank during 2005 and 2006, 24% 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, therefore WTPA's lending activity demonstrates that the bank is meeting the credit needs of smaller businesses.

WTPA's small business lending is further quantified based upon the annual revenue of the business. Small business loans were analyzed to determine whether they were made to businesses with gross annual revenues of \$1 million or less. Business demographic data reveals that 86% of the businesses in the assessment area were small businesses.

Of the 360 loans originated by WTPA, 192 (53%) were originated to businesses with gross annual revenues of \$1 million or less.

Community Development Lending

WTPA makes a relatively high level of community development loans. WTPA participates in economic development projects throughout its community. During the time period evaluated, the bank originated or renewed loans totaling \$6.4 million to finance two community development initiatives.

- WTPA renewed an existing \$3 million line of credit used to issue term loans to The Reinvestment Fund's Collaborative Lending Initiative (CLI). The CLI finances affordable housing construction projects in southeastern Pennsylvania.
- WTPA provided \$3.4 million in financing to a not-for-profit corporation to operate and improve their community-based correctional programs in Philadelphia, PA, and southern New Jersey. The programs support correctional facilities and are designed to assist the criminal justice system in the prevention and reduction of criminal activities.

Innovative or Flexible Lending Practices

The bank uses innovative and flexible lending practices to effectively address the credit needs of its assessment area, including low- and moderate-income individuals and geographies. WTPA offers flexible and innovative home purchase and business loan products specifically designed to meet the needs of low- and moderate-income borrowers and small businesses.

WTPA offers a discounted first-time home buyers program for low- and moderate-income borrowers. The loans offer flexible underwriting criteria, reduced interest rates, and discounted points. Under this program, the bank originated 20 loans totaling \$4.5 million in 2005 and 2006. All of the loans are held by WTC or WTFBSB.

The bank also purchases residential mortgage loans originated in low- and moderate-income geographies or originated to low- and moderate-income individuals within its assessment area. The loans are either purchased on the secondary market or directly through a contractual arrangement with a mortgage company. In 2005 and 2006, the bank purchased 92 home mortgage loans, aggregating \$10.4 million.

Responsiveness

An analysis was conducted to determine the institution's record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income borrowers and very small businesses. The analysis revealed that WTPA has exhibited a good record of serving the credit needs of highly disadvantaged areas and borrowers within its assessment area, primarily through the purchase of home mortgage credit.

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments serving low- and moderate-income geographies and/or individuals, along with the innovativeness and complexity of such investments. Qualified investments made prior to the previous evaluation that are still outstanding are considered under the test. For purposes of CRA, the term qualified investment has been defined to include a lawful investment, deposit, membership share, or grant, including a donation, or in-kind contribution of property that has as its primary purpose community development.

Performance under the investment test is assessed as outstanding.

Volume of Investment and Grant Activity

A review of WTPA's investment activity revealed that the bank has an excellent level of qualified investments and grants. The bank has demonstrated excellent responsiveness to community credit and development needs by investing in organizations and projects that support affordable housing, community services, and economic development.

WTPA has \$1 million in qualified community development investments in The Reinvestment Fund, a community development financial institution which provides extensive financial and technical support and assistance to community development initiatives throughout the Philadelphia MD.

The bank made a \$2 million investment in a low-income housing tax credit fund for the development of 50 affordable rental units in Philadelphia's Mantua neighborhood. This project will provide much needed housing for low- and moderate-income families. Ten units will target the homeless, with six units targeting very low-income households.

In addition to investments, the bank has made grants and contributions to various local organizations that routinely provide affordable housing and community development services that benefit low- and moderate-income individuals and geographies. During the period between evaluations, the bank made \$543,344 in qualified grants and contributions.

WTPA has demonstrated excellent responsiveness to credit and community development needs through the use of some innovative and complex investments to support community development initiatives. Qualified investments are tailored to the needs of particular organizations or geographic areas. Specifically, a substantial majority of the bank's investments are to organizations that promote affordable housing and economic development. Qualified investments total approximately \$3.5 million. Within the context of the bank's asset size and overall operating capacity, the present dollar volume of investments is considered excellent.

SERVICE TEST

The service test evaluates the 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 geographies 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.

Performance under the service test is assessed as high satisfactory.

Accessibility of Delivery Systems

WTPA's branch delivery system is accessible to limited portions of the bank's assessment area. The bank currently operates four branches. Its business strategy is to focus on commercial banking and wealth management; consequently, the offices are primarily staffed with commercial lenders as well as trust and private banking personnel and resemble private offices rather than traditional branches. Three of WTPA's branches are located in upper-income geographies in Bucks, Montgomery and Chester Counties, and one is in a moderate-income geography in Philadelphia.

WTPA's limited branch network and its business strategy do not facilitate effective delivery of retail products and services to low- and moderate-income individuals and geographies. However, the bank has effectively served the banking needs of its assessment area in less traditional ways, as discussed below.

Alternative Retail Banking Services and Delivery Mechanisms

To supplement traditional banking services, WTPA offers a telephone banking option. Services include opening deposit accounts, transfers between accounts, and bill payment. The bank also accepts credit card and loan applications through its Loan-By-Phone center Monday through Friday from 8:30 a.m. to 7:00 p.m. and Saturdays from 9:00 a.m. to 1:00 p.m.

WTPA also offers a fully transactional Web site at www.wilmingtontrust.com. The bank's on-line banking service allows customers direct access to their accounts 24-hours a day and offers a wide variety of online banking services, including applying for loans, establishing accounts, paying bills, and transferring funds.

WTPA operates four ATMs: one full-service machine at its financial advisory center in an upper-income geography in Villanova and three additional stand alone ATMs that dispense cash; one in a middle-income geography in Philadelphia, one in a middle-income geography in Chester County, and one in an upper-income geography in Bucks County.

Business Hours and Services in Meeting Assessment Area Needs

Services and business hours are consistent among branch offices, and do not inconvenience certain sectors of the assessment area, including low- and moderate-income geographies or individuals.

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems in low- and moderate-income geographies or to low- and moderate-income individuals. There were no branch openings or closings during the evaluation period.

Community Development Services

WTPA is a leader in providing community development services in its assessment area. Most services are provided in the form of specialized or affordable housing programs, technical assistance offered by employees on behalf of the bank to entities that provide community and economic development services, banking products, and educational seminars. Notable community development services are detailed below.

Specialized or Affordable Housing Programs

- WTPA is a member of the Federal Home Loan Bank of Pittsburgh (FHLB) and is an active participant in its Affordable Housing Program (AHP). The purpose of the AHP is to provide subsidies for: (1) projects that finance homeownership for households at 80% or below the area median income; or (2) projects financing rental housing where at least 20% of the units will be occupied by (and affordable for) households at 50% or below the area median income.

Only member institutions of the FHLB can submit AHP applications. Therefore, nonprofit agencies, local governments, and community development organizations must obtain the support of member institutions to apply for AHP funds. In addition to sponsoring an application, WTPA is responsible for monitoring the approved project and ensuring that the affordable housing project is consistent with program objectives.

WTPA continues to administer, on behalf of two nonprofit housing organizations, a \$500 thousand grant from the AHP program for the construction of rental housing in Harleysville, Montgomery County, PA. The project provides 86 one-bedroom and 14 two-bedroom units for the elderly in the low- and moderate-income category. The bank is responsible for monitoring the approved project to verify that the affordable housing project remains consistent with its approved program objectives.

- WTPA provides investment and cash management services for The Reinvestment Fund, which provides financial support and assistance to community development initiatives throughout the Philadelphia MSA.

Technical Assistance Offered by Employees on Behalf of the Bank

WTPA employees participate regularly in local community organizations dedicated to community development, including the following.

- A WTPA employee serves on the board of directors and the loan committee of the Reinvestment Fund's Collaborative Lending Initiative, which provides financial support and assistance to community development initiatives throughout the Philadelphia MSA.
- WTPA's President serves on the board of Fox and Roach Charities, Devon, PA, a nonprofit organization that supports organizations that address affordable housing needs in the bank's assessment area.
- A bank employee participates regularly in first-time homebuyer seminars sponsored by various non-profit organizations which provide affordable housing options for low- and moderate-income borrowers.

Banking Products

In addition to the FHLB's AHP, WTPA 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, WTPA offers a business checking account with no minimum balance requirement. The account includes 250 transactions (deposits or checks paid) at no charge.

To serve the needs of low- and moderate-income individuals, WTPA offers a low-cost checking account that requires an opening balance of \$50 and no minimum balance requirement. This account provides greater access to banking services for low- and moderate-income individuals.

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 geographies.

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

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

LOAN DISTRIBUTION TABLE – PHILADELPHIA MD 2005 AND 2006

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	2	2.6%	434	3.2%	13	17.1%	1,142	8.3%
Moderate	31	40.8%	3,928	28.6%	26	34.2%	3,582	26.1%
Middle	30	39.5%	5,307	38.7%	1	1.3%	210	1.5%
Upper	13	17.1%	4,053	29.5%	13	17.1%	3,846	28.0%
Unknown	0	0.0%	0	0.0%	23	30.3%	4,942	36.0%
Total	76	100.0%	13,722	100.0%	76	100.0%	13,722	100.0%
	Refinance							
Low	2	3.5%	79	1.0%	19	33.3%	1,630	19.8%
Moderate	11	19.3%	1,056	12.8%	36	63.2%	4,349	52.8%
Middle	32	56.1%	3,745	45.4%	0	0.0%	0	0.0%
Upper	12	21.1%	3,364	40.8%	2	3.5%	2,265	27.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	57	100.0%	8,244	100.0%	57	100.0%	8,244	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	1	20.0%	20	2.4%
Moderate	1	20.0%	260	31.1%	0	0.0%	0	0.0%
Middle	1	20.0%	95	11.4%	1	20.0%	260	31.1%
Upper	3	60.0%	480	57.5%	3	60.0%	555	66.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	835	100.0%	5	100.0%	835	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%
Middle	4	100.0%	886	100.0%	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%	4	100.0%	886	100.0%
Total	4	100.0%	886	100.0%	4	100.0%	886	100.0%
	HMDA Totals							
Low	4	2.8%	513	2.2%	33	23.2%	2,792	11.8%
Moderate	43	30.3%	5,244	22.1%	62	43.7%	7,931	33.5%
Middle	67	47.2%	10,033	42.4%	2	1.4%	470	2.0%
Upper	28	19.7%	7,897	33.3%	18	12.7%	6,666	28.1%
Unknown	0	0.0%	0	0.0%	27	19.0%	5,828	24.6%
Total	142	100.0%	23,687	100.0%	142	100.0%	23,687	100.0%

LOAN DISTRIBUTION TABLE – PHILADELPHIA MD 2005 AND 2006 (CONTINUED)

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	17	4.7%	5,071	4.2%	0	0.0%	0	0.0%
Moderate	38	10.6%	9,487	7.9%	0	0.0%	0	0.0%
Middle	91	25.3%	25,471	21.3%	0	0.0%	0	0.0%
Upper	212	58.9%	78,071	65.4%	0	0.0%	0	0.0%
Unknown	2	0.6%	1,280	1.1%	0	0.0%	0	0.0%
Total	360	100.0%	119,380	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	192	53.3%	54,029	45.3%	0	0.0%	0	0.0%
Over \$1 Million	168	46.7%	65,351	54.7%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	360	100.0%	119,380	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	85	23.6%	5,548	4.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	92	25.6%	17,084	14.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	183	50.8%	96,748	81.0%	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	360	100.0%	119,380	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	59	30.7%	3,587	6.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	55	28.6%	10,136	18.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	78	40.6%	40,306	74.6%	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	192	100.0%	54,029	100.0%	0	0.0%	0	0.0%

CRA APPENDIX C: ASSESSMENT AREA MAP

