

PUBLIC DISCLOSURE

August 6, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**ING Bank, fsb
1 South Orange Street
Wilmington, DE 19801
Docket #: 16782**

**Office of Thrift Supervision
Northeast Region
Harborside Financial Center Plaza Five, Suite 1600
Jersey City, NJ 07311**

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.



Office of Thrift Supervision
Department of the Treasury

Northeast Region

Jersey City Regional Office • Phone Number: 201-413-1000 • Fax: 201-413-7543
Harborside Financial Center, Plaza Five, Suite 1600, Jersey City, NJ 07311

May 6, 2009

Board of Directors
ING Bank, fsb
1 South Orange Street
Wilmington, DE 19801

Board of Directors:

Enclosed is your institution's written Community Reinvestment Act (CRA) Performance Evaluation. The Office of Thrift Supervision (OTS) prepared the evaluation as of August 6, 2008. Pursuant to the provisions of the CRA and OTS regulations (12 C.F.R. 563e), your institution must make this evaluation and your institution's CRA rating available to the public.

In accordance with 12 C.F.R. 563e, your institution must make this written CRA Performance Evaluation available to the public within 30 business days of receiving it. You must place the evaluation in your CRA public file at your home office and at each branch within this time frame. You may not alter or abridge the evaluation in any manner. At your discretion, you may retain previous written CRA Performance Evaluation(s) with the most recent evaluation in your CRA public file.

Your institution may prepare a response to the evaluation. You may place the response in each CRA public file along with the evaluation. In the event your institution elects to prepare such a response, please forward a copy of it to this office.

All appropriate personnel, particularly customer contact personnel, need to be aware of the responsibilities that the institution has to make this evaluation available to the public. Consequently, we suggest that your institution review internal procedures for handling CRA inquiries, including those pertaining to the evaluation and other contents of the CRA public file.

We strongly encourage the Board of Directors, senior management, and other appropriate personnel to review this document and to take an active interest and role in the CRA activities of your institution.

Sincerely,

Sherry L. Antonellis
Assistant Director

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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of ING Bank, fsb. The Office of Thrift Supervision (OTS) prepared the evaluation as of August 6, 2008. OTS evaluates performance in assessment area(s) delineated by the institution rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all, of the institution's branches. OTS rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 563e.

Institution

Overall Rating

INSTITUTION'S CRA RATING: Outstanding

During the evaluation period, the lending levels of residential mortgage loans reflected a good responsiveness to assessment area credit needs. The distribution of loans to low- and moderate-income (LMI) borrowers in the assessment area, and in the supplemental areas used to evaluate performance, showed good penetration. ING purchased residential mortgage loans in the assessment area and in other MSAs throughout the country as an alternative strategy to meet its CRA responsibilities.

The Bank participated in a significant level of community development investments and grants in the assessment area. ING acted in a leadership position in sponsoring a program to assist at-risk children to become productive and self-sufficient citizens, by focusing on financial literacy and youth programs.

The institution is a leader in providing community development services in the assessment area. Officers, managers, and employees have played an active role in numerous organizations that provided financial services to LMI residents. While ING has no traditional branch offices, retail services are readily available to customers in the entire assessment area through telephone, Internet, or ATM access.

Institution

Lending, Investment, Service Test Table

The following table indicates the performance level of ING Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	ING Bank 8/6/2008		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

Institution (continued)

Description of Institution

ING Bank, fsb, doing business as ING Direct (“ING”), is a \$79 billion stock institution and a wholly-owned subsidiary of ING USA Holding Corporation, Delaware, which is a subsidiary of ING Groep, N.V., (the “Parent”) headquartered in Amsterdam, the Netherlands. ING offers an array of deposit and loan products, including regular savings, certificates of deposit, demand deposit accounts, residential first mortgage loans and home equity lines of credit. Various adjustable rate mortgages are offered, while no 30-year fixed rate mortgages are.

Since there are no branches, transactions are primarily conducted over the Internet. ING deposit products are targeted to customers desiring relatively high interest rates and who do not require services provided by the typical retail banking institution. Also, loan payments must be paid electronically to avoid fees, and customers with demand deposit accounts must conduct all transactions electronically; paper checks are not provided. In part, to enhance CRA performance, ING purchases residential mortgage loans from various lenders. ING also sells non-insured products offered by its affiliated companies, including insurance policies and mutual funds.

ING conducts its marketing efforts via direct mail, billboard, radio and television advertisements, and its web site. The Bank is headquartered at 1 South Orange Street, Wilmington, Delaware. While the Bank has no branch offices and does not accept cash transactions, customers can conduct business and receive information regarding products and services at offices named “cafes”, which are located in Wilmington, St. Cloud, Minnesota, and Los Angeles, California. These cafes have computers and telephones on the premises, which are available to conduct banking business.

During the evaluation period, ING had significant growth. Total assets increased from \$19 billion on December 31, 2003 to \$79 billion at year-end 2007. Outstanding residential mortgage loans increased from \$4 billion to \$26 billion during the same period. The percentage of total deposits in the assessment area was five percent in 2005 and 2006, and nine percent in 2007. The increase in deposits in 2007 was the result of a successful marketing campaign.

As of December 31, 2007, the total loan portfolio equaled \$26.4 billion. Table 1 indicates the dollar amount, percentage to total loans, and percentage to total assets of each loan category.

Institution (continued)

Table 1 - ING's Investment in Loans (12/31/2007 Thrift Financial Report)			
Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Residential Mortgage	\$25,999,790	98.3%	32.6%
Nonresidential Mortgage	55,354	0.2%	0.1%
Commercial Nonmortgage	33,522	0.1%	0.0%
Consumer	359,840	1.4%	0.4%
Total	\$26,448,506	100.0%	33.1%

Scope of Examination

ING was evaluated using the OTS Large Savings Association Examination Procedures. These include assessment of the bank's performance under a lending test, investment test, and services test. Since residential mortgage loans comprised the vast majority of loans originated, this was the focus of our evaluation. ING also purchased residential mortgage loans and mortgage-backed securities secured by dwellings located in the assessment area as a means of addressing its CRA obligations. At the most recent CRA evaluation dated November 3, 2004 a CRA rating of "Satisfactory" was assigned. There were no apparent financial or legal impediments precluding the Bank from meeting assessment area credit needs.

Description of Assessment Area

ING's assessment area consists of the entire Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metropolitan Statistical Area ("Philadelphia MSA"), #37980. This MSA is comprised of three smaller Metropolitan Divisions ("MDs"). Table 2 reflects the assessment area's MDs and counties.

Institution (continued)

Table 2 – Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA #37980	
MD #	Metropolitan Division/County
37964	Philadelphia, PA Metropolitan Division
	Bucks County, PA
	Chester County, PA
	Delaware County, PA
	Montgomery County, PA
	Philadelphia County, PA
15804	Camden, NJ Metropolitan Division
	Burlington County, NJ
	Camden County, NJ
	Gloucester County, NJ
48864	Wilmington, DE-MD-NJ Metropolitan Division
	New Castle County, DE
	Cecil County, MD
	Salem County, NJ

Table 3 illustrates demographic data on population, families, and housing units within the assessment area.

Table 3 - Demographic Data (Based on 2000 U.S. Census Data)	
Demographic Data	2000 Census
Population	5,687,147
Total Families	1,449,738
1-4 Family Units	1,897,438
Multi-family Units	352,989
% Owner-Occupied Units	66%
% Rental-Occupied Units	28%
% Vacant Housing Units	6%
Weighted Average Median Housing	\$124,957

Table 4 indicates the number of geographies in each income level and compares it to the distribution of families living in those geographies and to 1-4 family dwellings located within those geographies.

Institution (continued)

Geography Income Level	Geographies		Total Area Families		1-4 Family Dwellings	
	#	%	#	%	#	%
Low	152	10.3%	128,081	8.8%	208,662	11.0%
Moderate	271	18.4%	254,857	17.6%	373,201	19.7%
Middle	600	40.8%	598,424	41.3%	753,243	39.7%
Upper	425	28.9%	468,376	32.3%	562,200	29.6%
Income NA	24	1.6%	0	0.0%	132	0.0%
Total	1,472	100.0%	1,449,738	100.0%	1,897,438	100.0%

According to the 2000 U.S. Census, 38.7 percent of the families in the assessment area are classified as low- and moderate-income, with 7.9 percent of the families reporting income below the poverty level. The Department of Housing and Urban Development (“HUD”) annually adjusts 2000 Census data to update the income levels. The adjusted figures are used in the Lending to Borrowers of Different Incomes section of this Performance Evaluation. Table 5(a) indicates the median family income ranges of each income category based on the 2007 HUD adjustment. Table 5(b) reflects the updated HUD median family income for each year during the review period. Table 5(c) shows the distribution of families in each income range of the assessment area.

Income Category (As % of MD Median)	Philadelphia, PA MD (#37964)		Camden, NJ MD (#15804)		Wilmgtn, DE-NJ-MD MD (#48864)	
	From	To	From	To	From	To
Low (< 50%)	\$1	\$34,599	\$1	\$38,449	\$1	\$36,949
Moderate (50% - 79%)	\$34,600	\$55,359	\$38,450	\$61,519	\$36,950	\$59,119
Middle (80% - 119%)	\$55,360	\$83,039	\$61,520	\$92,279	\$59,120	\$88,679
Upper (>= 120%)	\$83,040	+	\$92,280	+	\$88,680	+

* Based on HUD 2007 Median Family Income of the Metropolitan Division

Year	Phila, PA MD	Camden, NJ MD	XXX MD
	Amount	Amount	Amount
2005	\$66,550	\$73,400	\$73,800
2006	\$69,800	\$77,300	\$73,200
2007	\$69,200	\$76,900	\$73,900

Institution (continued)

Table 5(c) - Distribution of Families In the Assessment Area		
Family Income Category (% of MD Median)	2000 Census Data	
	Number	Percent
Low (< 50%)	305,799	21.1%
Moderate (50% - 79%)	254,754	17.6%
Middle (80% - 119%)	316,399	21.8%
Upper (>= 120%)	572,786	39.5%
Total	1,449,738	100.0%

According to the 2000 Census, the Philadelphia MSA population, increased 5 percent since 1990. Pennsylvania’s population increased 3.4 percent during the same time period, while New Jersey’s population increased 8.9 percent. The median age of Philadelphia MSA residents was 36.4 years. The median age of Pennsylvania’s residents was 38 years and the median age of New Jersey’s residents was 36.7 years; Delaware’s median age was also 36.7 years for the same period.

The assessment area has a diversified economy, and the City of Wilmington, due to favorable tax benefits, is the home for some of the largest banking institutions in the country. Major employers include Bank of America, the University of Pennsylvania, Jefferson Health Systems, Christiana Health Care System, and Campbell Soup Corporation.

ING competes with the largest banks in the country and with a number of online financial service providers, including Emigrant Direct, HSBC Direct, E*Trade Bank, and Capital One.

In conjunction with the evaluation, we talked to an outside contact who heads a non-profit housing development agency. This agency provides multiple housing programs in Kent and Sussex counties, primarily targeted to LMI households. The contact indicated that financial institutions are generally supportive of the goals and objectives of the agency. While the degree of involvement varied among financial institutions, Discover Bank, JP Morgan Chase Bank, and Bank of America were institutions that provided large donations to the agency. Delaware National Bank, County Bank, and ING were institutions that provided below market interest rate loans to the organization.

Institution (continued)

Conclusions With Respect To Performance Tests

Lending Test

Under the lending test, the areas reviewed consisted of the institution’s lending activity within its assessment area, the geographic distribution of loans, and the distribution of loans to borrowers of various income levels. Additional areas reviewed included the institution’s responsiveness to the credit needs of highly economically disadvantaged geographies and individuals, community development lending activities, and the use of innovative and flexible loan products to serve assessment area credit needs.

Lending in the Assessment Area

ING offers a variety of adjustable rate residential mortgage loans and also purchases mortgage loans from others. Table 6 illustrates the total number and dollar amount of HMDA-reportable loans (home purchase, refinance and home improvement loans) originated in and outside the assessment area during the 36-month review period ended December 31, 2007. For comparison purposes, the table reflects lending activity by each appropriate year during the review period.

Table 6 - Concentration of Residential Loans *					
1/1/2005 – 12/31/2007					
(Dollars in thousands)					
Period By Year	In Assessment Area		Outside Assessment Area		Total HMDA Loans
By Number:	#	%	#	%	#
2005	1,022	5%	19,069	95%	20,091
2006	1,420	7%	18,796	93%	20,216
2007	1,279	4%	30,364	96%	31,643
Total	3,721	5%	68,229	95%	71,950
By \$ Amount:	\$ Amt	%	\$ Amt	%	\$ Amt
2005	\$199,323	3%	\$5,842,945	97%	\$6,042,268
2006	265,094	4%	5,834,932	96%	6,100,026
2007	274,680	2%	12,972,700	98%	13,247,380
Total	\$739,097	3%	\$24,650,577	97%	\$25,389,674

* Percents are based on total loans originated during applicable year

Institution (continued)

Table 6 shows that the institution originated between four percent and seven percent of its loans, by number, in the assessment area. Further, the distribution is in line with total deposits in the assessment area, which totaled five percent in 2005 and 2006 and increased to nine percent in 2007. Additionally, ING’s residential product offering is limited to adjustable rate mortgage products. During the applicable rate environment, the majority of borrowers desired long-term fixed rate loans. Overall lending volume decreased in 2007 which was typical of lenders nationwide. This distribution is reasonable when consideration is given to ING’s nationwide lending strategy and unique branchless platform where services are provided over the Internet and by telephone. It is considered to meet the standard for satisfactory performance in this criterion.

Geographic Distribution of Loans

Part of the lending test includes an analysis of ING’s lending activity with respect to the distribution of loans among geographic areas of different income levels within the assessment area. Table 7 illustrates loan originations and purchases, categorized by geography income level, that were reported by ING during each year of the review period, and compares this activity to the 2006 and 2007 aggregate lenders.

Table 7 - Distribution of ING’s HMDA-Reportable Loans By Geography Income Level in the Assessment Area (Dollars in thousands)										
Geography Inc. Level	2005		2006		2007		Review Period 1/1/05 – 12/31/07		Aggregate	
	#	%	#	%	#	%	#	%	% by #	% by #
By Number:										
Low	20	2.0%	59	4.2%	90	7.0%	169	4.5%	5.0%	5.1%
Moderate	125	12.2%	253	17.8%	301	23.5%	679	18.3%	17.1%	16.4%
Middle	399	39.0%	573	40.3%	464	36.3%	1,436	38.6%	47.0%	46.0%
Upper	478	46.8%	535	37.7%	424	33.2%	1,437	38.6%	30.9%	32.5%
Total	1,022	100.0%	1,420	100.0%	1279	100.0%	3,721	100.0%	100.0%	100.0%
By \$ Amt:	\$	%	\$	%	\$	%	\$	%	% by \$	% by \$
Low	\$1,976	1.0%	\$6,616	2.5%	\$8538	3.1%	\$17,130	2.3%	2.7%	2.8%
Moderate	16,134	8.1%	32,921	12.4%	42667	15.5%	91,722	12.4%	11.7%	11.8%
Middle	63,419	31.8%	90,800	34.3%	80714	29.4%	234,933	31.8%	43.0%	42.1%
Upper	117,794	59.1%	134,757	50.8%	142761	52.0%	395,312	53.5%	42.6%	43.3%
Total	\$199,323	100.0%	\$265,094	100.0%	\$274,680	100.0%	\$739,097	100.0%	100.0%	100.0%

Institution (continued)

ING's percentage distribution of loans by number and dollar amount within LMI geographies for 2006 was consistent with those for aggregate lenders. In 2007, ING's lending exceeded that of aggregate lenders in both low- and moderate-income geographies. Some of this volume was achieved by ING through the purposeful purchase of loans in assessment area LMI geographies as a means to fulfill its CRA obligations.

Based upon this analysis, ING has met the standard for satisfactory compliance in lending to LMI geographies in the assessment area.

Borrower Characteristics

Part of the lending test includes an analysis of ING's lending activity with respect to the distribution of loans among borrowers of different income levels within the assessment area. Table 8 illustrates loan originations and purchases, categorized by borrower income level, that were reported by ING during each year of the review period, and compares this activity to the 2006 and 2007 aggregate lenders.

Table 8 - Distribution of ING's HMDA-Reportable Loans By Borrower Income Level in the Assessment Area (Dollars in thousands)										
Borrower Inc. Level	2005		2006		2007		Review Period 1/1/05 – 12/31/07		Aggregate	
	#	%	#	%	#	%	#	%	% by #	% by #
By Number:										
Low	51	5.0%	109	7.7%	174	13.6%	334	9.0%	7.2%	7.4%
Moderate	190	18.6%	365	25.7%	346	27.1%	901	24.2%	18.8%	19.8%
Middle	236	23.1%	317	22.3%	200	15.6%	753	20.2%	23.6%	24.4%
Upper	480	47.0%	593	41.8%	487	38.1%	1,560	42.0%	34.7%	37.6%
Income NA	65	6.3%	36	2.5%	72	5.6%	173	4.6%	15.7%	10.8%
Total	1,022	100.0%	1,420	100.0%	1,279	100.0%	3,721	100.0%	100.0%	100.0%
By \$ Amt:	\$	%	\$	%	\$	%	\$	%	% by \$	% by \$
Low	\$3,595	1.8%	\$11,206	4.2%	\$18,308	6.7%	\$33,109	4.5%	3.5%	3.6%
Moderate	22,763	11.4%	45,595	17.2%	42,885	15.6%	111,243	15.1%	13.2%	14.1%
Middle	36,849	18.5%	48,823	18.4%	32,116	11.7%	117,788	15.9%	20.5%	21.3%
Upper	122,683	61.6%	148,615	56.1%	162,083	59.0%	433,381	58.6%	44.7%	47.2%
Income NA	13,433	6.7%	10,855	4.1%	19,288	7.0%	43,576	5.9%	18.1%	13.8%
Total	\$199,323	100.0%	\$265,094	100.0%	\$274,680	100.0%	\$739,097	100.0%	100.0%	100.0%

Institution (continued)

The percentage distribution of both the number and dollar volume to total loans increased every year from 2005 through 2007 and was more favorable than that for aggregate lenders in 2006 and 2007. In 2006, 33.4 percent of ING's total loans by number were granted to LMI borrowers versus aggregate lender performance of 26.0 percent. In 2007, 40.7 percent of the total number of ING's loans was granted to LMI borrowers compared to 27.2 percent granted by aggregate lenders. This distribution shows an excellent responsiveness to the credit needs of the assessment area and more than meets the standard for satisfactory performance.

Community Development Lending

During the evaluation period, ING refinanced an existing mortgage in the amount of \$700 thousand to a non-profit organization, whose goal is to prepare children in the elementary, middle and high schools to better serve the community by providing them with a business and economic education. The building is located in a LMI geography in Delaware.

Innovative and Flexible Lending Practices

ING does not offer long term fixed rate mortgages. However, through the web site and various training seminars, potential applicants are educated regarding the potential benefits of obtaining an adjustable rate mortgage. The Bank's closing costs for its ARM programs are less than those of other lenders with comparable programs.

Overall Conclusions – Lending in the Assessment Area

Based upon the above analyses, we have determined that ING's performance under the various criteria comprising the lending test at least meets the standards for satisfactory performance. Because of this, we also considered residential loans originated outside the assessment area in this evaluation.

The distribution of ING's residential mortgage lending was reviewed for 14 additional MSAs ("Supplemental Areas"), which comprised 66 percent of the total loans during the three-year evaluation period. These were selected based upon the following criteria: the 12 MSAs with the most significant lending volume were chosen; and two other MSAs that had less significant volume were randomly chosen.

Institution (continued)

Management of ING established an internal goal to originate and purchase at least 50 percent of total residential mortgages in the assessment area and other specifically selected MSAs with the intent of meeting the levels of aggregate HMDA reporters' lending to LMI borrowers and geographies. Residential mortgage loans are purchased, in part, to enhance the distribution to LMI borrowers and geographies and allow the Bank to better meet its CRA obligations.

In purchasing loans, ING often selected those MSAs where those where residential loans could be purchased at the lowest price. The distribution of residential mortgage loans to LMI borrowers and geographies was less favorable in the Supplemental Areas in California and New York (MSAs number 31100, 41860, 35620, 40140, 41740, and 41940) in this evaluation due to the higher premiums to purchase loans in these MSAs. The business decision by ING management to purchase residential loans in this manner was prudent from a financial perspective and allowed the institution to have a greater impact by purchasing more loans.

Supplemental Evaluation Areas

Under the lending test, we reviewed the concentration of the institution's lending activity within the supplemental evaluation areas, the geographic distribution of loans, and distribution of loans to all borrower income groups.

Within the Supplemental Areas, the percentage distribution of the number of residential loans in LMI areas was substantially more favorable than that of aggregate HMDA lenders in those MSAs. In the targeted MSAs, purchased loans comprised between 30.1 percent and 60.9 percent of total originations during the CRA evaluation period. The distribution by geography was similar to that of aggregate HMDA lenders, with the exception of the Detroit-Warren-Livonia, MI (#19820) and Denver-Aurora, CO (#19740) MSAs, which significantly exceeded aggregate lenders, and where purchased loans comprised 54.1 percent to 60.9 percent of loan originations respectively.

The following chart illustrates the total number and dollar amount of HMDA-reportable loans originated and/or purchased in the Supplemental Areas during the 36-month review period ending December 31, 2007.

Institution (continued)

Concentration of HMDA-reportable Loans in Supplemental Areas (Dollars in thousands)					
Supplemental Area MSA Name	MSA#	Count	\$ Amount	% by #	% by \$
Chicago-Naperville-Joliet, IL-IN-WI	16980	9,112	\$3,084,189	12.7%	12.1%
Los Angeles-Long Beach-Santa Ana CA	31100	8,429	4,148,063	11.7%	16.3%
Phoenix-Mesa-Scottsdale, AZ	38060	5,054	1,757,644	7.0%	6.9%
San Francisco-Oakland-Fremont, CA	41860	4,611	2,446,556	6.4%	9.6%
NY-Northern NJ-Long Island, NY-NJ-PA	35620	3,587	1,180,182	5.0%	4.6%
Wash-Arlington-Alexandria, DC-VA-MD-WV	47900	2,697	934,623	3.7%	3.7%
San Diego-Carlsbad-San Marcos, CA	41740	2,415	1,111,886	3.4%	4.4%
San Jose-Sunnyvale-Santa Clara, CA	41940	2,395	1,394,830	3.3%	5.5%
Boston-Cambridge-Quincy, MA-NH	14460	2,135	674,931	3.0%	2.7%
Seattle-Tacoma-Bellevue, WA	42660	1,843	694,978	2.6%	2.7%
Atlanta-Sandy Springs-Marietta, GA	12060	1,658	309,725	2.3%	1.2%
Riverside-San Bernardino-Ontario, CA	40140	1,535	614,391	2.1%	2.4%
Detroit-Warren-Livonia, MI	19820	894	178,682	1.2%	0.7%
Denver-Aurora, CO	19740	780	217,892	1.1%	0.9%
All other areas	NA	24,805	6,641,102	34.5%	26.3%
Total HMDA Loans		71,950	\$25,389,674	100.0%	100.0%

The following section shows charts analyzing the institution’s lending activity within each of the fourteen supplemental areas and compares it to the 2007 aggregate based on geographic distribution and borrower income levels. Although 2006 aggregate data for the Supplemental Areas was not included on the charts, the percentage distribution was considered in the evaluation.

Demographic and Lending Data for the Chicago-Naperville-Joliet, IL-IN-WI MSA #16980

Table SA-1.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level in the noted Supplemental Area.

Table SA-1.1 - Geography and Family Demographics Chicago-Naperville-Joliet MSA Supplemental Area						
Income Level Category	Geographies		Families by Geography		Families by Income	
	#	%	#	%	#	%
Low	257	12.5%	142,906	6.4%	463,467	20.6%
Moderate	514	25.0%	482,758	21.5%	397,937	17.7%
Middle	742	36.3%	926,119	41.1%	500,130	22.3%
Upper	522	25.4%	695,857	31.0%	886,106	39.4%
Income NA	17	0.8%	0	0.0%	0	0.0%
Total	2,052	100.0%	2,247,640	100.0%	2,247,640	100.0%

Institution (continued)

Table SA-1.2 illustrates ING’s distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to the 2007 aggregate.

Table SA-1.2 - Geography & Borrower Distribution of HMDA-reportable Loans Chicago-Naperville-Joliet MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	488	5.4%	4.0%	326	3.6%	4.1%
Moderate	1,775	19.5%	16.3%	1,612	17.7%	16.3%
Middle	1,650	18.1%	25.0%	2,734	30.0%	42.8%
Upper	5,134	56.3%	40.5%	4,430	48.6%	36.8%
Income NA	65	0.7%	14.2%	10	0.1%	0.0%
Total	9,112	100.0%	100.0%	9,112	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$63,679	2.1%	1.9%	\$79,428	2.6%	3.8%
Moderate	259,702	8.4%	10.5%	357,490	11.6%	13.7%
Middle	314,646	10.2%	20.2%	639,076	20.7%	36.4%
Upper	2,425,129	78.6%	50.6%	2,004,213	65.0%	46.1%
Income NA	21,033	0.7%	16.8%	3,982	0.1%	0.0%
Total	\$3,084,189	100.0%	100.0%	\$3,084,189	100.0%	100.0%

The table shows that 24.9 percent of the total number of residential mortgage loans made during the review period was granted to LMI borrowers, which was more favorable than that of aggregate lenders at 20.8 percent in 2006 and 20.3 percent in 2007. The distribution in LMI geographies was at 21.3 percent in 2006 as compared to that of the aggregate at 22.2 percent in 2006 and 20.4 percent in 2007. This demonstrates a more than satisfactory level of performance within this Supplemental Area in regard to these aspects of the lending test.

Demographic and Lending Data for the Los Angeles-Long Beach-Santa Ana, CA MSA #31100

Table SA-2.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level in the noted Supplemental Area.

Table SA-2.1 - Geography and Family Demographics Los Angeles-Long Beach-Santa Ana MSA Supplemental Area						
Income Level Category	Geographies		Families by Geography		Families by Income	
	#	%	#	%	#	%
Low	200	7.6%	177,139	6.3%	653,725	23.1%
Moderate	736	28.0%	771,693	27.3%	476,311	16.8%
Middle	766	29.1%	870,585	30.8%	514,318	18.2%
Upper	912	34.7%	1,008,806	35.6%	1,183,869	41.9%
Income NA	17	0.6%	0	0.0%	0	0.0%
Total	2,631	100.0%	2,828,223	100.0%	2,828,223	100.0%

Institution (continued)

Table SA-2.2 illustrates ING’s distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to that of the 2007 aggregate.

Table SA-2.2 - Geography & Borrower Distribution of HMDA-reportable Loans Los Angeles-Long Beach-Santa Ana MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	116	1.4%	0.8%	150	1.8%	3.3%
Moderate	428	5.1%	3.5%	1,502	17.8%	20.4%
Middle	725	8.6%	10.4%	1,995	23.7%	33.2%
Upper	6,981	82.8%	66.4%	4,758	56.4%	43.0%
Income NA	179	2.1%	18.9%	24	0.3%	0.1%
Total	8,429	100.0%	100.0%	8,429	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$28,858	0.7%	0.3%	\$44,789	1.1%	3.1%
Moderate	88,220	2.1%	1.7%	480,084	11.6%	16.7%
Middle	192,860	4.6%	6.4%	818,045	19.7%	27.7%
Upper	3,746,246	90.4%	69.9%	2,790,736	67.3%	52.4%
Income NA	91,879	2.2%	21.7%	14,409	0.3%	0.1%
Total	\$4,148,063	100.0%	100.0%	\$4,148,063	100.0%	100.0%

The table shows that 6.5 percent of the number of residential mortgage loans made or purchased by ING during the review period was granted to LMI borrowers. This exceeded levels for aggregate lenders, who originated 3.5 percent to LMI borrowers in 2006 and 4.3 percent in 2007. The distribution of loans in LMI geographies for ING was 19.6 percent, which was somewhat less than that of aggregate lenders in 2006 and 2007. Management of ING stated that this is mostly due to the high premium placed on loans purchased from this MSA, which is consistent with the Bank’s strategy. Additionally, due to high housing costs in California, the percentage distribution for all mortgage lenders to LMI borrowers is significantly less than the 39.9 percent of LMI families in this MSA. Given these factors, ING has demonstrated a satisfactory level of performance within this Supplemental Area in regard to these aspects of the lending test.

Demographic and Lending Data for the Phoenix-Mesa-Scottsdale, AZ MSA #38060

Table SA-3.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level for the noted Supplemental Area.

Institution (continued)

Table SA-3.1 - Geography and Family Demographics Phoenix-Mesa-Scottsdale MSA Supplemental Area						
Income Level Category	Geographies		Families by Geography		Families by Income	
	#	%	#	%	#	%
Low	43	6.2%	28,907	3.6%	159,766	19.6%
Moderate	199	28.6%	227,365	27.9%	152,978	18.8%
Middle	238	34.2%	300,373	36.9%	177,620	21.8%
Upper	210	30.2%	257,619	31.6%	323,900	39.8%
Income NA	6	0.8%	0	0.0%	0	0.0%
Total	696	100.0%	814,264	100.0%	814,264	100.0%

Table SA-3.2 illustrates ING’s distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to that of the 2007 aggregate.

Table SA-3.2 - Geography & Borrower Distribution of HMDA-reportable Loans Phoenix-Mesa-Scottsdale MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	248	4.9%	2.4%	61	1.2%	1.4%
Moderate	908	18.0%	12.9%	1,115	22.1%	23.1%
Middle	789	15.6%	20.9%	1,433	28.4%	40.8%
Upper	3,026	59.9%	46.5%	2,445	48.3%	34.7%
Income NA	83	1.6%	17.3%	0	0.0%	0.0%
Total	5,054	100.0%	100.0%	5,054	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$30,654	1.7%	1.2%	\$9,901	0.6%	1.0%
Moderate	135,795	7.7%	8.5%	203,523	11.6%	16.8%
Middle	145,821	8.3%	16.1%	334,558	19.0%	35.0%
Upper	1,422,858	81.0%	55.8%	1,209,662	68.8%	47.2%
Income NA	22,516	1.3%	18.4%	0	0.0%	0.0%
Total	\$1,757,644	100.0%	100.0%	\$1,757,644	100.0%	100.0%

The table shows that the distribution of loans to LMI borrowers for ING, at 22.9 percent, significantly exceeded that of aggregate lenders: 14.3 percent in 2006; and 15.3 percent in 2007. The geographic distribution of mortgage loans by ING in LMI geographies was comparable to that of aggregate lenders: 23.3 percent for ING in the review period; 25.5 percent for the aggregate in 2006; and 24.5 percent for the aggregate in 2007. This demonstrates a more than satisfactory level of performance within this Supplemental Area in regard to these aspects of the lending test.

Institution (continued)

Demographic and Lending Data for the San Francisco-Oakland-Fremont, CA MSA #41860

Table SA-4.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level for the noted Supplemental Area.

Table SA-4.1 - Geography and Family Demographics						
San Francisco-Oakland-Fremont MSA Supplemental Area						
Income Level Category	Geographies		Families by Geography		Families by Income	
	#	%	#	%	#	%
Low	80	9.2%	63,544	6.6%	204,161	21.1%
Moderate	185	21.2%	176,820	18.3%	169,388	17.5%
Middle	340	39.1%	407,099	42.0%	200,242	20.7%
Upper	263	30.2%	319,628	33.1%	393,300	40.7%
Income NA	3	0.3%	0	0.0%	0	0.0%
Total	871	100.0%	967,091	100.0%	967,091	100.0%

Table SA-4.2 illustrates ING's distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to that of the 2007 aggregate.

Table SA-4.2 - Geography & Borrower Distribution of HMDA-reportable Loans						
San Francisco-Oakland-Fremont MSA Supplemental Area						
(Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	91	2.0%	1.4%	172	3.7%	5.0%
Moderate	360	7.8%	6.4%	584	12.7%	16.5%
Middle	536	11.6%	14.2%	1,820	39.5%	42.7%
Upper	3,522	76.4%	58.5%	2,035	44.1%	35.8%
Income NA	102	2.2%	19.5%	0	0.0%	0.0%
Total	4,611	100.0%	100.0%	4,611	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$22,162	0.9%	0.5%	\$62,506	2.6%	4.1%
Moderate	91,098	3.7%	3.3%	239,288	9.8%	13.6%
Middle	183,855	7.5%	9.4%	842,816	34.4%	37.1%
Upper	2,095,486	85.7%	64.8%	1,301,946	53.2%	45.2%
Income NA	53,955	2.2%	22.0%	0	0.0%	0.0%
Total	\$2,446,556	100.0%	100.0%	\$2,446,556	100.0%	100.0%

Institution (continued)

The table shows that 9.8 percent of the number of residential mortgage loans made or purchased by ING during the review period were granted to LMI borrowers. This was higher than that of aggregate lenders, who originated 6.5 percent of the total number of loans to LMI borrowers in 2006 and 7.8 percent in 2007. ING’s distribution of loans in LMI geographies, at 16.4 percent of the total number of residential mortgage loans, was significantly less than that of aggregate lenders at 23.8 percent in 2006 and 21.5 percent in 2007. Management of ING stated that this MSA was not targeted to purchase significant numbers of mortgage loans due to the high premiums demanded for those loans. Due to high housing costs, the percentage distribution to LMI borrowers is significantly less than the 38.5 percent of LMI families in this MSA. Given these factors, performance in this Supplemental Area is considered to be satisfactory in these aspects of the lending test.

Demographic and Lending Data for the NY-Northern NJ-Long Island, NY-NJ-PA MSA #35620

Table SA-5.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-5.1 - Geography and Family Demographics NY-Northern NJ-Long Island MSA Supplemental Area						
Income Level	Geographies		Families by Geography		Families by Income	
Category	#	%	#	%	#	%
Low	445	9.9%	399,343	8.8%	1,054,314	23.3%
Moderate	1,011	22.4%	995,964	22.0%	746,356	16.5%
Middle	1,603	35.6%	1,637,858	36.2%	865,460	19.1%
Upper	1,362	30.2%	1,495,403	33.0%	1,862,438	41.1%
Income NA	84	1.9%	0	0.0%	0	0.0%
Total	4,505	100.0%	4,528,568	100.0%	4,528,568	100.0%

Table SA-5.2 illustrates ING’s distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to that of the 2007 aggregate.

Institution (continued)

Table SA-5.2 - Geography & Borrower Distribution of HMDA-reportable Loans NY-Northern NJ-Long Island MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	78	2.2%	2.2%	31	0.9%	3.4%
Moderate	316	8.8%	9.6%	324	9.0%	17.9%
Middle	715	19.9%	19.5%	1,293	36.0%	41.4%
Upper	2,369	66.1%	53.7%	1,933	53.9%	37.3%
Income NA	109	3.0%	15.0%	6	0.2%	0.0%
Total	3,587	100.0%	100.0%	3,587	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$20,904	1.8%	0.8%	\$9,791	0.8%	3.7%
Moderate	48,812	4.1%	5.3%	81,492	6.9%	16.2%
Middle	150,066	12.7%	13.6%	341,307	28.9%	35.7%
Upper	909,928	77.1%	60.3%	745,213	63.2%	44.3%
Income NA	50,472	4.3%	20.0%	2,379	0.2%	0.1%
Total	\$1,180,182	100.0%	100.0%	\$1,180,182	100.0%	100.0%

The distribution to LMI borrowers, at 11.0 percent of the number of residential mortgage loans during the review period, was comparable to that of aggregate lenders at 11.4 percent in 2006 and 11.8 percent in 2007. ING's distribution in LMI geographies, at 9.9 percent of the total number of residential mortgage loans, was significantly less than aggregate lenders which originated 23.9 percent in 2006 and 21.3 percent in 2007. Management of ING stated that this MSA was not targeted to purchase significant numbers of mortgage loans due to the high premiums demanded for those loans. Due to high housing costs, the percentage distribution to LMI borrowers is significantly less than the 39.8 percent of LMI families in this MSA. Given these factors, performance in this Supplemental Area is considered to be satisfactory in these aspects of the lending test.

Institution (continued)

Demographic and Lending Data for the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA #47900

Table SA-6.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-6.1 - Geography and Family Demographics Washington-Arlington-Alexandria MSA Supplemental Area						
Income Level Category	Geographies		Families by Geography		Families by Income	
	#	%	#	%	#	%
Low	76	7.5%	50,872	4.2%	237,010	19.8%
Moderate	252	24.8%	266,008	22.2%	216,891	18.1%
Middle	389	38.3%	506,276	42.4%	269,556	22.5%
Upper	291	28.6%	373,897	31.2%	473,596	39.6%
Income NA	8	0.8%	0	0.0%	0	0.0%
Total	1,016	100.0%	1,197,053	100.0%	1,197,053	100.0%

Table SA-6.2 illustrates ING's distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to that of the 2007 aggregate.

Table SA-6.2 - Geography & Borrower Distribution of HMDA-reportable Loans Washington-Arlington-Alexandria MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	250	9.3%	6.2%	73	2.7%	3.0%
Moderate	570	21.1%	19.5%	476	17.6%	20.1%
Middle	621	23.0%	25.6%	1,095	40.7%	46.3%
Upper	1,162	43.1%	33.9%	1,053	39.0%	30.6%
Income NA	94	3.5%	14.8%	0	0.0%	0.0%
Total	2,697	100.0%	100.0%	2,697	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$46,235	4.9%	3.4%	\$19,001	2.0%	2.6%
Moderate	124,697	13.3%	14.5%	117,449	12.6%	16.3%
Middle	182,512	19.5%	22.7%	324,091	34.7%	42.4%
Upper	543,571	58.3%	42.1%	474,082	50.7%	38.7%
Income NA	37,608	4.0%	17.3%	0	0.0%	0.0%
Total	\$934,623	100.0%	100.0%	\$934,623	100.0%	100.0%

Institution (continued)

The distribution shows that the percentage of lending to LMI borrowers for the review period at 30.4 percent of the total number of loans was significantly more favorable than that of aggregate lenders at 20.2 percent in 2006 and 25.7 percent in 2007. The geographic distribution of residential mortgages in LMI geographies was 20.3 percent of the total number of loans. This was slightly less than that of aggregate lenders, at 23.7 percent in 2006 and 23.1 percent in 2007. The favorable distribution to LMI borrowers shows that ING’s strategy of purchasing residential mortgage loans to meet its CRA responsibilities in MD 47894, which represented the vast majority of this MSA, was successful.

Demographic and Lending Data for the San Diego-Carlsbad-San Marcos, CA MSA #41740

Table SA-7.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-7.1 - Geography and Family Demographics San Diego-Carlsbad-San Marcos MSA Supplemental Area						
Income Level	Geographies		Families by Geography		Families by Income	
Category	#	%	#	%	#	%
Low	48	7.9%	44,733	6.7%	140,625	21.0%
Moderate	136	22.5%	148,992	22.3%	119,858	17.9%
Middle	228	37.7%	251,776	37.6%	134,436	20.1%
Upper	190	31.4%	223,601	33.4%	274,183	41.0%
Income NA	3	0.5%	0	0.0%	0	0.0%
Total	605	100.0%	669,102	100.0%	669,102	100.0%

Table SA-7.2 illustrates ING’s distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to that of the 2007 aggregate.

Institution (continued)

Table SA-7.2 - Geography & Borrower Distribution of HMDA-reportable Loans San Diego-Carlsbad-San Marcos MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	46	1.9%	1.1%	98	4.1%	4.5%
Moderate	177	7.3%	5.4%	337	14.0%	14.5%
Middle	247	10.2%	14.9%	784	32.5%	39.2%
Upper	1,878	77.8%	61.0%	1,196	49.4%	41.8%
Income NA	67	2.8%	17.6%	0	0.0%	0.0%
Total	2,415	100.0%	100.0%	2,415	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$14,544	1.3%	0.5%	\$31,753	2.9%	3.6%
Moderate	37,698	3.4%	2.7%	108,294	9.7%	11.6%
Middle	72,957	6.6%	10.1%	313,536	28.2%	33.7%
Upper	954,192	85.8%	66.1%	658,303	59.2%	51.1%
Income NA	32,495	2.9%	20.1%	0	0.0%	0.0%
Total	\$1,111,886	100.0%	100.0%	\$1,111,886	100.0%	100.0%

The table shows that 9.2 percent of the number of residential mortgage loans during the review period were granted to LMI borrowers, which was more favorable than aggregate lenders which originated 4.2 percent of the total number of loans to LMI borrowers in 2006 and 6.5 percent in 2007. The distribution in LMI geographies at 18.1 percent of the total number of residential mortgage loans was less favorable than aggregate lenders which originated 21.1 percent of the total number of residential mortgage loans in LMI geographies in 2006 and 19.0 percent in 2007. While this MSA was not targeted by ING to purchase loans to enhance CRA performance, the distribution by income is more favorable than that of aggregate lenders. The distribution to LMI borrowers was significantly less than the 38.9 percent of LMI families in the assessment area, reflecting the high housing costs in this MSA.

Institution (continued)

Demographic and Lending Data for the San Jose-Sunnyvale-Santa Clara, CA MSA #41940

Table SA-8.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-8.1 - Geography and Family Demographics						
San Jose-Sunnyvale-Santa Clara MSA Supplemental Area						
Income Level	Geographies		Families by Geography		Families by Income	
Category	#	%	#	%	#	%
Low	14	4.0%	12,598	3.1%	84,766	20.5%
Moderate	79	22.6%	87,267	21.1%	74,770	18.1%
Middle	163	46.8%	197,236	47.8%	89,555	21.7%
Upper	93	26.6%	115,682	28.0%	163,692	39.7%
Total	349	100.0%	412,783	100.0%	412,783	100.0%

Table SA-8.2 illustrates ING's distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to the 2007 aggregate.

Table SA-8.2 - Geography & Borrower Distribution of HMDA-reportable Loans						
San Jose-Sunnyvale-Santa Clara MSA Supplemental Area						
<i>(Dollars in thousands)</i>						
Inc. Level	Borrower Distribution			Geography Distribution		
Category	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	24	1.0%	1.5%	28	1.2%	2.0%
Moderate	119	5.0%	6.8%	349	14.6%	21.1%
Middle	278	11.6%	16.1%	1,079	45.0%	46.9%
Upper	1,930	80.6%	58.6%	939	39.2%	30.0%
Income NA	44	1.8%	17.0%	0	0.0%	0.0%
Total	2,395	100.0%	100.0%	2,395	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$6,984	0.5%	0.6%	\$10,906	0.8%	1.5%
Moderate	36,687	2.6%	3.7%	158,263	11.3%	16.8%
Middle	110,896	8.0%	11.3%	584,421	41.9%	42.7%
Upper	1,216,377	87.2%	65.4%	641,240	46.0%	39.0%
Income NA	23,886	1.7%	19.0%	0	0.0%	0.0%
Total	\$1,394,830	100.0%	100.0%	\$1,394,830	100.0%	100.0%

Institution (continued)

The table shows that 6.0 percent of the number of residential mortgage loans during the review period were granted to LMI borrowers, which was slightly less than that of aggregate lenders which originated 7.0 percent of the total number of loans to LMI borrowers in 2006 and 8.3 percent in 2007. The distribution in LMI geographies at 15.8 percent of the total number of residential mortgage loans during the evaluation period was less favorable than aggregate lenders which originated 26.2 percent of the total number of residential mortgage loans in LMI geographies in 2006 and 23.1 percent of the total in 2007. Management of ING stated that this MSA was not targeted for the purchase of large numbers of residential mortgages due to the high premiums demanded in certain areas. Due to high housing costs, the percentage distribution to LMI borrowers is significantly less than the 38.6 percent of LMI families in this MSA.

Demographic and Lending Data for the Boston-Cambridge-Quincy, MA-NH MSA #14460

Table SA-9.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-9.1 - Geography and Family Demographics Boston-Cambridge-Quincy MSA Supplemental Area						
Income Level Category	Geographies		Families by Geography		Families by Income	
	#	%	#	%	#	%
Low	69	7.5%	46,929	4.3%	219,320	20.2%
Moderate	207	22.5%	216,556	20.0%	193,019	17.8%
Middle	421	45.8%	520,828	48.1%	243,817	22.5%
Upper	221	24.0%	299,087	27.6%	427,244	39.5%
Income NA	2	0.2%	0	0.0%	0	0.0%
Total	920	100.0%	1,083,400	100.0%	1,083,400	100.0%

Table SA-9.2 illustrates ING’s distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to the 2007 aggregate.

Institution (continued)

Table SA-9.2 - Geography & Borrower Distribution of HMDA-reportable Loans Boston-Cambridge-Quincy MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	184	8.6%	3.9%	73	3.4%	2.5%
Moderate	494	23.1%	15.3%	466	21.8%	17.7%
Middle	443	20.7%	24.6%	935	43.8%	51.9%
Upper	993	46.6%	40.0%	661	31.0%	27.9%
Income NA	21	1.0%	16.2%	0	0.0%	0.0%
Total	2,135	100.0%	100.0%	2,135	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$27,774	4.1%	1.8%	\$20,671	3.1%	2.4%
Moderate	94,133	13.9%	10.3%	109,199	16.2%	15.3%
Middle	106,665	15.8%	20.7%	239,876	35.5%	45.7%
Upper	437,256	64.9%	48.1%	305,185	45.2%	36.6%
Income NA	9,103	1.3%	19.1%	0	0.0%	0.0%
Total	\$674,931	100.0%	100.0%	\$674,931	100.0%	100.0%

The table shows that the 31.7 percent of the number of residential mortgage loans originated during the review period to LMI borrowers was more favorable than that if aggregate lenders, which originated 18.9 percent of the total number of loans to LMI borrowers in 2006 and 19.2 percent in 2007. The distribution in LMI geographies at 25.2 percent of the total number of residential mortgage loans was greater than aggregate lenders, which originated 23.7 percent of the total number of residential mortgage loans in LMI geographies in 2006 and 20.2 percent in 2007. The favorable distribution shows that ING’s strategy of purchasing residential mortgage loans to meet its CRA responsibilities in this MSA was successful.

Institution (continued)

Demographic and Lending Data for the Seattle-Tacoma-Bellevue, WA MSA #42660

Table SA-10.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-10.1 - Geography and Family Demographics Seattle-Tacoma-Bellevue MSA Supplemental Area						
Income Level	Geographies		Families by Geography		Families by Income	
Category	#	%	#	%	#	%
Low	16	2.4%	11,163	1.5%	141,605	18.5%
Moderate	135	20.3%	145,084	19.0%	143,189	18.7%
Middle	358	53.9%	417,994	54.7%	185,118	24.2%
Upper	154	23.2%	189,730	24.8%	294,059	38.6%
Income NA	1	0.2%	0	0.0%	0	0.0%
Total	664	100.0%	763,971	100.0%	763,971	100.0%

Table SA-10.2 illustrates ING's distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to the 2007 aggregate.

Table SA-10.2 - Geography & Borrower Distribution of HMDA-reportable Loans Seattle-Tacoma-Bellevue MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	75	4.1%	2.3%	17	0.9%	1.0%
Moderate	373	20.2%	13.3%	370	20.1%	16.8%
Middle	314	17.0%	24.7%	772	41.9%	58.0%
Upper	1,016	55.2%	45.7%	684	37.1%	24.2%
Income NA	65	3.5%	14.0%	0	0.0%	0.0%
Total	1,843	100.0%	100.0%	1,843	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$14,614	2.1%	1.1%	\$3,639	0.5%	.8%
Moderate	70,678	10.2%	9.0%	86,243	12.4%	13.7%
Middle	80,367	11.6%	20.2%	261,806	37.7%	54.4%
Upper	508,333	73.1%	53.5%	343,290	49.4%	31.1%
Income NA	20,986	3.0%	16.2%	0	0.0%	0.0%
Total	\$694,978	100.0%	100.0%	\$694,978	100.0%	100.0%

Institution (continued)

The table shows that the 24.3 percent of the number of residential mortgage loans originated during the review period to LMI borrowers was more favorable than that of aggregate lenders, which originated 13.8 percent of the total number of loans to LMI borrowers in 2006 and 15.6 percent in 2007. The distribution in LMI geographies at 21.0 percent of the total number of residential mortgage loans was greater than aggregate lenders, which originated 17.4 percent of the total number of residential mortgage loans in LMI geographies in 2006 and 17.8 percent in 2007. The favorable distribution shows that ING’s strategy of purchasing residential mortgage loans to meet its CRA responsibilities in this MSA was successful.

Demographic and Lending Data for the Atlanta-Sandy Springs-Marietta, GA MSA #12060

Table SA-11.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-11.1 - Geography and Family Demographics Atlanta-Sandy Springs-Marietta MSA Supplemental Area						
Income Level	Geographies		Families by Geography		Families by Income	
Category	#	%	#	%	#	%
Low	72	10.4%	50,781	4.7%	217,328	20.0
Moderate	185	26.8%	241,729	22.2%	197,053	18.1%
Middle	250	36.3%	451,630	41.6%	242,542	22.3%
Upper	182	26.4%	342,722	31.5%	429,939	39.6%
Income NA	1	0.1%	0	0.0%	0	0.0%
Total	690	100.0%	1,086,862	100.0%	1,086,862	100.0%

Institution (continued)

Table SA-11.2 illustrates ING’s distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to the 2007 aggregate.

Table SA-11.2 - Geography & Borrower Distribution of HMDA-reportable Loans Atlanta-Sandy Springs-Marietta MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	139	8.4%	6.0%	51	3.1%	3.2%
Moderate	438	26.4%	19.8%	308	18.6%	17.1%
Middle	325	19.6%	23.1%	584	35.2%	46.8%
Upper	718	43.3%	36.8%	715	43.1%	32.9%
Income NA	38	2.3%	14.3%	0	0.0%	0.0%
Total	1,658	100.0%	100.0%	1,658	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$17,876	5.8%	3.3%	\$7,838	2.5%	2.9%
Moderate	56,476	18.2%	13.9%	41,931	13.5%	13.2%
Middle	50,041	16.2%	19.2%	91,095	29.4%	41.8%
Upper	178,723	57.7%	46.6%	168,861	54.6%	42.1%
Income NA	6,609	2.1%	17.0%	0	0.0%	0.0%
Total	\$309,725	100.0%	100.0%	\$309,725	100.0%	100.0%

The table shows that the 34.8 percent of the number of residential mortgage loans originated during the review period to LMI borrowers was more favorable than that of aggregate lenders, which originated 24.0 percent of the total number of loans to LMI borrowers in 2006 and 25.8 percent in 2007. The distribution in LMI geographies at 21.7 percent of the total number of residential mortgage loans was greater than aggregate lenders, which originated 21.0 percent of the total number of residential mortgage loans in LMI geographies in 2006 and 20.3 percent in 2007. The favorable distribution shows that ING’s strategy of purchasing residential mortgage loans to meet its CRA responsibilities in this MSA was successful.

Institution (continued)

Demographic and Lending Data for the Riverside-San Bernardino-Ontario, CA MSA #40140

Table SA-12.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-12.1 - Geography and Family Demographics Riverside-San Bernardino-Ontario MSA Supplemental Area						
Income Level	Geographies		Families by Geography		Families by Income	
Category	#	%	#	%	#	%
Low	27	4.6%	23,743	3.0%	170,035	21.7%
Moderate	169	28.8%	206,370	26.4%	136,757	17.5%
Middle	241	41.1%	325,941	41.7%	158,290	20.2%
Upper	146	24.9%	226,358	28.9%	317,330	40.6%
Income NA	4	0.6%	0	0.0%	0	0.0%
Total	587	100.0%	782,412	100.0%	782,412	100.0%

Table SA-12.2 illustrates ING's distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to the 2007 aggregate.

Table SA-12.2 - Geography & Borrower Distribution of HMDA-reportable Loans Riverside-San Bernardino-Ontario MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	13	0.8%	1.2%	3	0.2%	1.5%
Moderate	35	2.3%	5.4%	163	10.6%	20.3%
Middle	145	9.4%	15.2%	594	38.7%	45.5%
Upper	1,251	81.6%	60.7%	775	50.5%	32.7%
Income NA	91	5.9%	17.5%	0	0.0%	0.0%
Total	1,535	100.0%	100.0%	1,535	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$4,376	0.7%	0.6%	\$876	0.1%	1.2%
Moderate	7,475	1.2%	3.2%	55,504	9.0%	17.2%
Middle	35,385	5.8%	11.8%	200,388	32.6%	42.7%
Upper	532,560	86.7%	65.8%	357,623	58.3%	38.9%
Income NA	34,595	5.6%	18.6%	0	0.0%	0.0%
Total	\$614,391	100.0%	100.0%	\$614,391	100.0%	100.0%

Institution (continued)

The table shows that the 3.1 percent of the number of residential mortgage loans granted to LMI borrowers during the review period was slightly less than that of aggregate lenders which originated 4.7 percent of the total number of loans to LMI borrowers in 2006 and 6.6 percent in 2007. The distribution in LMI geographies at 10.8 percent of the total number of residential mortgage loans was less favorable than aggregate lenders which originated 23.7 percent of the total number of residential mortgage loans in LMI geographies in 2006 and 20.8 percent in 2007. Management of ING stated that this MSA was not targeted for the purchase of large numbers of residential mortgages due to the high premiums demanded in this MSA. Due to high housing costs, the percentage distribution to LMI borrowers is significantly less than the 39.2 percent of LMI families in this MSA.

Demographic and Lending Data for the Detroit-Warren-Livonia, MI MSA #19820

Table SA-13.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-13.1 - Geography and Family Demographics Detroit-Warren-Livonia MSA Supplemental Area						
Income Level	Geographies		Families by Geography		Families by Income	
Category	#	%	#	%	#	%
Low	87	6.7%	46,012	4.0%	236,863	20.5%
Moderate	327	25.4%	266,591	23.1%	205,860	17.8%
Middle	537	41.7%	516,277	44.6%	252,945	21.9%
Upper	327	25.4%	327,604	28.3%	460,816	39.8%
Income NA	11	0.8%	0	0.0%	0	0.0%
Total	1,289	100.0%	1,156,484	100.0%	1,156,484	100.0%

Institution (continued)

Table SA-13.2 illustrates ING’s distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to the 2007 aggregate.

Table SA-13.2 - Geography & Borrower Distribution of HMDA-reportable Loans Detroit-Warren-Livonia MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	161	18.0%	8.2%	16	1.8%	1.5%
Moderate	294	32.9%	20.2%	250	28.0%	17.2%
Middle	138	15.4%	22.8%	324	36.2%	47.7%
Upper	274	30.7%	32.9%	304	34.0%	33.6%
Income NA	27	3.0%	15.9%	0	0.0%	0.1%
Total	894	100.0%	100.0%	894	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$15,321	8.6%	4.5%	\$1,054	0.6%	.8%
Moderate	32,893	18.4%	14.3%	24,689	13.8%	10.6%
Middle	21,380	12.0%	19.7%	51,593	28.9%	42.1%
Upper	101,931	57.0%	43.5%	101,346	56.7%	46.4%
Income NA	7,157	4.0%	18.0%	0	0.0%	0.1%
Total	\$178,682	100.0%	100.0%	\$178,682	100.0%	100.0%

The table shows that the 50.9 percent of the number of residential mortgage loans originated to LMI borrowers during the review period was significantly higher than that of aggregate lenders, which originated 29.2 percent of the total number of loans to LMI borrowers in 2006 and 28.4 percent in 2007. The distribution in LMI geographies at 29.8 percent of the total number of residential mortgage loans was more than aggregate lenders, which originated 22.0 percent of the total number of residential mortgage loans in LMI geographies in 2006 and 18.7 percent in 2007. The favorable distribution shows that ING’s strategy of purchasing residential mortgage loans in this MSA to enhance CRA performance was successful.

Institution (continued)

Demographic and Lending Data for the Denver-Aurora, CO MSA #19740

Table SA-14.1 illustrates the number of geographies in each income level, the distribution of families living in those geographies, and the distribution of families based on family income level.

Table SA-14.1 - Geography and Family Demographics Denver-Aurora MSA Supplemental Area						
Income Level	Geographies		Families by Geography		Families by Income	
Category	#	%	#	%	#	%
Low	21	3.9%	19,794	3.6%	99,176	18.0%
Moderate	145	26.6%	139,026	25.2%	102,713	18.6%
Middle	216	39.6%	223,663	40.6%	130,442	23.7%
Upper	152	27.9%	168,314	30.6%	218,466	39.7%
Income NA	11	2.0%	0	0.0%	0	0.0%
Total	545	100.0%	550,797	100.0%	550,797	100.0%

Table SA-14.2 illustrates ING's distribution of HMDA-reportable loans during the review period by geography and borrower income levels, and compares this lending activity to the 2007 aggregate.

Table SA-14.2 - Geography & Borrower Distribution of HMDA-reportable Loans Denver-Aurora MSA Supplemental Area (Dollars in thousands)						
Inc. Level Category	Borrower Distribution			Geography Distribution		
	ING		Aggr. 2007	ING		Aggr. 2007
By Number	#	%	% by #	#	%	% by #
Low	111	14.2%	5.1%	29	3.7%	2.6%
Moderate	174	22.3%	17.4%	204	26.2%	16.9%
Middle	123	15.8%	22.3%	213	27.3%	41.1%
Upper	342	43.9%	39.2%	324	41.5%	38.7%
Income NA	30	3.8%	16.0%	10	1.3%	0.7%
Total	780	100.0%	100.0%	780	100.0%	100.0%
By \$ Amt	\$	%	% by \$	\$	%	% by \$
Low	\$15,540	7.1%	2.8%	\$5,653	2.6%	2.1%
Moderate	26,698	12.3%	12.3%	31,683	14.5%	12.5%
Middle	24,606	11.3%	18.8%	43,471	20.0%	36.4%
Upper	142,800	65.5%	48.8%	133,561	61.3%	48.0%
Income NA	8,248	3.8%	17.3%	3,524	1.6%	1.0%
Total	\$217,892	100.0%	100.0%	\$217,892	100.0%	100.0%

Institution (continued)

The table shows that the 36.5 percent of the number of residential mortgage loans originated during the review period to LMI borrowers was more favorable than that of aggregate lenders, which originated 20.7 percent of the total number of loans to LMI borrowers in 2006 and 22.5 percent in 2007. The distribution in LMI geographies at 29.9 percent of the total number of residential mortgage loans was more than aggregate lenders, which originated 20.4 percent of the total number of residential mortgage loans in LMI geographies in 2006 and 19.5 percent in 2007. The favorable distribution shows that ING's strategy of purchasing residential mortgage loans in this MSA to enhance CRA performance was successful.

Investment Test

Under the investment test, the areas reviewed consisted of the institution's investment and grant activity, the innovativeness or complexity of such activity, and its responsiveness to credit and community development needs.

The institution had a significant level of qualified community development investments and grants. Such investments showed a good responsiveness to credit and community economic development needs, particularly the needs of small businesses.

During the evaluation period, ING purchased nineteen mortgage-backed securities (MBS) in the aggregate amount of \$99 million. The MBS are secured by residential mortgages granted to LMI households in the assessment area.

In the second quarter of 2007, ING made a \$13 million investment, representing a pro rata share in a \$496 million pool to the Small Business Investment Corporation (SBIC). The investment, which is guaranteed by the Small Business Administration (SBA), was established to stimulate and supplement the flow of private equity capital and long term loan funds to small businesses. The SBA will provide funds to 92 SBICs throughout the United States.

There are three outstanding investments aggregating \$6.2 million in a fund that makes investments through a number of SBICs. The entity manages SBIC funds that target women- and minority-owned businesses located in urban and rural low- and moderate-income areas. The fund invests in companies located in the Northeast corridor from Maine to Maryland.

In addition to the aforementioned investments, ING made significant charitable contributions for community development purposes. The following summarizes the qualified investments made during the evaluation period.

Institution (continued)

- Six contributions in the amount totaling 1.048 million were made to three non profit organizations that provide affordable housing for LMI individuals. Of the total, \$977 thousand was granted to a nonprofit organization that constructs housing through sweat equity. An additional contribution in the amount of \$69 thousand was made to a nonprofit organization in the assessment area that provides homeowners with zero interest mortgages, education and training to understand the importance of properly managing credit. A \$20 thousand contribution was made to an organization that provides assistance to families and individuals in the Wilmington area to move to safe, affordable housing.
- ING made 33 contributions aggregating \$2.0 million to nonprofit organizations that provided community services to LMI individuals. The most significant contribution was \$1.5 million made to ING DIRECT Kids Foundation. The objective of this non-profit corporation is to assist at risk children to become productive self-sufficient citizens. Additionally, the foundation focuses on financial literacy, homeownership opportunities for families, and youth programs. A \$75 thousand contribution was made to a community loan fund that supports asset accumulation for LMI individuals. The program supports savings by providing matching deposits and financial education with the goal of providing post secondary education or a small business startup.
- Four organizations were given grants in the aggregate amount of \$53 thousand for activities that revitalize or stabilize LMI geographies. Of the total, \$25 thousand was contributed to a non profit organization whose mission is to increase community awareness regarding the cultural and historical value of the train station vicinity, which will enhance the waterfront area and will draw residents and tourists to the Wilmington area. An additional \$15 thousand donation was given to a non profit organization that supports economic development efforts in a federally designated Enterprise Zone.

Service Test

Under the service test, the areas reviewed consisted of the accessibility of delivery systems, changes in branch locations, reasonableness of business hours, and the extent of community development services.

The evaluation of performance under the Service test showed that institution is a leader in providing community development services in the assessment area. While ING has no branches, the services are accessible through the Internet, telephone, or ATMs.

Institution (continued)

Retail Services

ING provides services through a transactional website or over the telephone. Such services are provided nationwide. There are no branch offices. The Bank also provides a toll free number for customer service which is staffed during business hours and provides automated service 24 hours per day. Customers can also obtain information regarding their account by calling ING representatives. ING is a member of a vast ATM network that provides additional access to its customers. The agreement that the Bank has with the ATM provider that allows for ING users to avoid the payment of ATM fees for the use of the machines.

The deposit services offered by the Bank require the use of electronic banking. No cash is accepted and the customer must have a relationship with another banking organization to open an account. However, the annual percentage yields offered are generally higher than other financial institutions for checking, savings, and certificates of deposit. Also, with the exception of the transaction account (Electric Orange), annual percentage yields are the same regardless of the amount deposited.

The residential first mortgage products are competitively priced and closing fees are less than most financial institutions. ING does not offer 30-year fixed rate mortgage loans; the vast majority of originations were adjustable rate mortgages. The website and disclosures summarize the risks and rewards regarding adjustable rate products.

Community Development Services

Management of ING encourages employees to volunteer in the communities where they work and proactive steps have been taken to educate Americans on how to gain financial independence, by showing what is needed to save for education or to obtain home ownership. A senior officer of ING works with community development officials to look for areas where opportunities can be maximized. Employees must volunteer a prescribed number of hours each year and ING provides the names of nonprofit organizations where that obligation can be fulfilled. The vast majority of these volunteer efforts did not meet the definition of Community Development Services as defined in the CRA Regulation. For example, employees donated significant time in clean-up efforts at a local school and donated sweat-equity to build dwellings for LMI households.

The following is a description of community development services provided during the evaluation period.

- Each year during the evaluation period, more than 50 ING employees participated with the Delaware Bankers Association and the Delaware's Center for Economic Education and

Institution (continued)

Entrepreneurship in a program to teach children to save. In 2007, bankers from 28 Delaware banks conducted a 45 minute training session for third and fourth graders on this subject.

- The Bank has developed “The Orange Journey”, an in-boarding orientation program for new associates. New employees must fulfill four to eight hours of community service. New associates have the option of participating at either the Salvation Army, the Food Bank of Delaware or Habitat for Humanity. The required community service must be completed within the first 90 days of employment and is a condition for continued employment by ING.
- Each year during the evaluation period, more than 80 employees volunteered in local classrooms under the Junior Achievement Program. Financial literacy is an important component of this program.
- ING continues to operate a website named “Planet Orange”, which is designed to teach children about money. The program features a Teacher Resource Center, with 20 downloadable lessons, a tutorial and a Curriculum Matrix to assist teachers in learning how Planet orange fits into the financial education standards in their state.
- In the second quarter of 2006 and 2007, employees volunteered in a “Poster Contest”, designed to raise awareness for students in grades three to twelve about the importance of saving. The program was sponsored to bring public and media attention to the importance of financial literacy among children.
- In the fourth quarter of 2007, ING hosted an after-school financial literacy program to teach children in West Philadelphia about saving. As part of the program, the participants were encouraged to set financial goals and were provided with a financial road map to achieve them.
- In the second quarter of 2007, 40 ING employees participated in a program to teach students in grades 3 through 6 regarding financial literacy and an understanding of economics. A total of 460 students participated.
- ING held frequent training seminars named “Philadelphia Saves Seminar”, which is a savings initiative that is targeted to LMI individuals.
- A senior employee at ING assists a local nonprofit organization whose mission is to address the marketability of economically disadvantaged women in Southeastern Pennsylvania that are taking steps to achieve economic self-sufficiency for themselves and their families. Financial service assistance is a critical component in the development process.
- An ING representative provides assistance to a nonprofit organization whose mission is to provide legal services to assist individuals with low incomes or who have disabilities with technical and financial expertise regarding housing issues that may arise.
- Employees at ING have annually volunteered to serve on the Delaware Earned Income Tax Credit (EITC) campaign for the purpose of promoting the EITC to low income workers and to offer free statewide tax preparation to residents earning less than \$40 thousand.

Institution (continued)

- A number of ING board members offered financial counseling to a non profit organization that builds housing for LMI households. The recipients must meet a “sweat-equity” requirement and participate in financial counseling.
- An ING representative provides technical expertise to an organization whose mission is to increase the economic vitality of Downtown Wilmington.

Fair Lending or Other Illegal Credit Practices Review

No violations of the substantive provisions of the antidiscrimination laws and regulations were identified during the concurrent examination where we evaluated compliance with consumer laws and regulations. Should the next independent examination find violations of the substantive provisions of the antidiscrimination laws and regulations, we will conduct a new evaluation taking into consideration the evidence of discriminatory or other illegal practices and assign a new rating accordingly.

Appendix A

Scope of Examination

SCOPE OF EXAMINATION		
Full Scope		
TIME PERIOD REVIEWED:	January 1, 2005 through December 31, 2007	
FINANCIAL INSTITUTION		PRODUCTS REVIEWED
ING Bank, FSB		Residential Mortgages (Originated and Purchased)
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
None		

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED ⁱ	OTHER INFORMATION
Philadelphia- Camden- Wilmington, PA –NJ-DE	Full Scope	No branches	None

ⁱ There is a statutory requirement that the written evaluation of a multistate institution’s performance must list the individual branches examined in each state.

Appendix B

Summary of State and Multistate Metropolitan Area Ratings

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Philadelphia-Camden-Wilmington MSA	High Satisfactory	Outstanding	Outstanding	Outstanding

CRA Rating Definitions

There are five separate and distinct CRA assessment methods set forth in the CRA: the lending, investment, and service tests for large, retail institutions; the intermediate small institution test for intermediate small savings associations; the streamlined examination method for small institutions; the community development test for wholesale and limited purpose institutions; and the strategic plan option for all institutions. OTS will assign an institution one of the four assigned ratings required by Section 807 of the CRA:

1. "Outstanding record of meeting community credit needs."
2. "Satisfactory record of meeting community credit needs."
3. "Needs to improve record of meeting community credit needs."
4. "Substantial noncompliance in meeting community credit needs."

OTS judges an institution's performance under the test and standards in the rule in the context of information about the institution, its community, its competitors, and its peers. Among the factors to evaluate in an examination are the economic and demographic characteristics of the assessment area(s); the lending, investment, service, and community development opportunities in the assessment area(s); the institution's product offerings and business strategy; the institution's capacity and constraints; the prior performance of the institution; in appropriate circumstances, the performance of a similarly situated institution; and other relevant information. An institution's performance need not fit each aspect of a particular rating profile in order to receive that rating, and exceptionally strong performance with respect to some aspects may compensate for weak performance in others. The institution's overall performance, however, must be consistent with safe and sound banking practices and generally with the appropriate rating profile. In addition, OTS adjusts the evaluation of an institution's performance under the applicable assessment method in accordance with §563e.21 and §563e.28, which provide for adjustments on the basis of evidence of discriminatory or other illegal credit practices.