



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**The Security National Bank And Trust Company
Charter Number: 6594**

**40 South Limestone Street
Springfield, Ohio 45502**

Office of the Comptroller of the Currency

**Central Ohio Field Office
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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, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **The Security National Bank And Trust Company (SNBT)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Security National Bank and Trust Company Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the credit needs of the Assessment Area (AA).
- There is good distribution of loans among geographies and borrowers of different income levels through the AA.
- Investments reflect adequate responsiveness to the needs of the AA.
- SNBT's offices provide good accessibility to geographies and individuals of different income levels, and good responsiveness of bank services to the needs of the AA.

Definitions and Common Abbreviations

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

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

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

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income 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.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing 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 (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 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 MA/assessment area.

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

Metropolitan Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by 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 Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

Upper-Income: Individual income that is 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.

Description of Institution

Security National Bank and Trust Company (SNBT) is an intrastate bank headquartered in Springfield, Ohio, which is about 50 miles west of Columbus, Ohio. SNBT has 15 branch offices located in the state of Ohio. SNBT is a wholly owned subsidiary of Park National Corporation (PNC), headquartered in Newark, Ohio, with total assets of approximately \$5 billion. PNC is a bank holding company for 8 banks located in the state of Ohio. It provides commercial, retail, and trust banking services. As of March 31, 2003, SNBT reported total assets of approximately \$935 million.

SNBT is a full service lender offering various loan and deposit products. SNBT offers home mortgage loans, home improvement loans, consumer loans, and a full range of business and agricultural loans. However, its primary business focus is commercial and residential real estate lending. As of March 31, 2003, net loans represented 48 percent of total assets and consisted of real estate loans (64 percent), commercial loans (23 percent), consumer loans (12 percent), and other loans (1 percent).

There are no legal, financial, or other factors impeding SNBT's ability to help meet the credit needs of the communities it serves. As of March 31, 2003, SNBT reported Tier One capital of \$61 million.

SNBT was rated "Satisfactory" at its last CRA evaluation dated May 15, 2000.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is from May 16, 2000, through August 25, 2003. For the Lending Test, home mortgage loans and small loans to businesses and farms for 2000, 2001, and 2002 were used. The evaluation period for the investments, services and CD loans is May 16, 2000 through August 25, 2003.

Products included in SNBT's Lending Test analysis are home mortgage loans, small loans to businesses, small loans to farms, and CD loans.

Data Integrity

The Community Reinvestment Act requires that banks, other than small banks, collect and maintain certain data regarding originations and purchases of small businesses, small farm, and Home Mortgage Disclosure Act (HMDA) loans.

As part of our evaluation, we performed a data integrity review on the bank's 2000, 2001, and 2002 HMDA, small business, and small farm data by comparing information from the bank's loan application registers to actual loan files. We found the data to be reliable.

In addition, we reviewed CD loans, investments, and services submitted by SNBT's management, to determine that they met the regulatory definitions for CD. The review indicated that some of the items submitted by the bank for consideration did not meet the definition or purpose of CD. Therefore, this evaluation was based on only those CD loans, investments, and services that met the regulatory definition.

Selection of Areas for Full-Scope Review

Our analysis included full-scope examination procedures for the Dayton-Springfield MSA, which includes Clark, Greene, and Miami counties (Springfield AA). SNBT only has one branch in a Non-MSA area (Fayette AA). Activity in the Fayette AA has been minimal. Less than two percent of the bank's total deposits are from this AA. Approximately one percent of the loans originated during this evaluation period were in this AA. Please refer to the table in Appendix A-1 for additional information on the scope of our review.

Ratings

The bank's overall rating is based primarily on the Springfield AA which received a full-scope review.

Lending performance in residential refinance loans and home improvement loans was weighted most heavily in determining the overall Lending Test rating, followed by home purchase loans and small loans to businesses. Small loans to farms received less weight as they make up a smaller portion of the bank's lending activity. This weighting is reflective of the bank's volume in each lending product.

Other

We contacted community representatives to assist in developing a market profile for the AA. The contacts included two government representatives, one representing the business and economic area, and one representing the consumer and housing area. We determined that the opportunities for qualified investments, and CD loans are moderate and opportunities for CD services are good. However, opportunities for qualified investments other than donations and grants are somewhat limited due to competition from large banks. The contacts believed local banks were doing an adequate job of meeting the business and consumer credit needs in the community.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory". Based on full-scope review, the bank's performance in the Springfield AA is good.

Lending Activity

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's lending activity. Lending activity in the Springfield AA is good.

In the AA, 36 percent, 54 percent, and 10 percent of loans originated/purchased were home mortgage loans, small loans to businesses, and small loans to farms, respectively.

Among home mortgage loans in the AA, 16 percent, 30 percent, 54 percent, and less than 1 percent were home purchase, home improvement, home mortgage refinance, and multifamily loans, respectively.

In the Springfield AA, SNBT's lending activity is good given its deposit market share, especially considering the large number of lending competitors in the area. SNBT ranks second in terms of depository institutions with a 19 percent deposit market share. According to 2001 aggregate HMDA data, out of approximately 307 mortgage lenders, SNBT ranked thirty-ninth, fourth, and twenty-seventh amongst the largest originators/purchasers of home purchase, home improvement, and home mortgage refinance loans. SNBT had a 0.6 percent, 8.5 percent, and 0.8 percent market share respectively. While SNBT's market share of home purchase, home improvement, and home mortgage loans was lower than its deposit market share, we considered the performance good given the large number of mortgage lenders within this AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of SNBT's home mortgage loans and small loans to businesses is good.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home purchase loans is very poor. The bank made no home purchase loans in low-income geographies. The distribution of loans in moderate-income geographies is lower than the percent of owner occupied units those geographies. SNBT's

market share of home purchase loans to both low- and moderate-income geographies is less than its overall market share.

Home improvement lending geographic distribution is excellent. The percentage of home improvement loans in low- and moderate-income geographies exceeds the percent of owner occupied units in those geographies. The market share for loans made in low-income geographies exceeds the overall market share. SNBT's market share in moderate-income geographies is lower than the overall market share.

The geographic distribution of refinanced home mortgage loans is good. The percentage of refinance loans made in low- and moderate-income geographies approximates the percentage of owner-occupied units in those geographies. The market share for loans made in low-income areas exceeds the bank's overall refinance market share. Market share in moderate-income geographies is lower than the overall refinance market share.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The small loans to businesses geographic distribution is excellent. The portion of small loans to businesses in low-income geographies and moderate-income geographies exceeds the percent of businesses in each of those geographies. In addition, the bank's market share in both the low- and moderate-income geographies exceeds its overall market share for small loans to businesses. SNBT's lending to businesses that are small equals 78 percent of total business loans compared to the percent of businesses in the AA that are small (81 percent).

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of small loans to farms is excellent. The portion of small loans to farms in low-income geographies is lower than the percentage of farms in those geographies; however; SNBT is the only lender in the AA with loans to farms in low-income geographies. Loans to farms in moderate-income geographies is significantly higher than the portion of farms in those geographies. SNBT is also the leading lender in those areas with approximately 67 percent of the total market share for farms in moderate-income areas. SNBT participates in the Agricultural Link Program. This program is for farm operating needs and the interest rate is reduced. See Flexible Lending Products for more details.

Lending Gap Analysis

Reports detailing SNBT's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

The bank's distribution of loans inside/outside of their AA is excellent. A significant majority of the HMDA, small business, and small farm loans originated by SNBT during the evaluation period were within its AA. Eighty-seven percent of the bank's HMDA loans (82 percent home purchase; 89 percent home improvement; 88 percent refinance; and 100 percent multifamily) were originated/purchased within the AA. Ninety-one percent of the bank's small loans to businesses, and 82 percent of loans to small farms were made within its AA. This performance was positively factored into the overall analysis of geographic distribution.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower is excellent.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home purchase loans by income level of the borrower is excellent. SNBT's performance in lending to low- and moderate-income families is excellent and exceeds the percent of low- and moderate-income families in the AA. The bank's market share is also good in lending to both low- and moderate-income families. The bank's market share exceeds the overall market share for low-income families and is lower than the market share for moderate-income families.

The overall distribution of home improvement loans by income level of the borrower is excellent. The percentage of bank loans to both low- and moderate-income individuals exceeds the percent of low- and moderate-income families in the AA. Also the bank's market share to low- and moderate-income individuals exceeds the bank's overall market share.

The distribution of refinance loans by income level of the borrower is good. SNBT demonstrates adequate performance to low-income individuals for refinanced loans in the AA considering that 10 percent of the families are living below the poverty level. Performance is excellent to moderate-income individuals as the bank's loans exceed the percent of families in the AA. Market share for low-income borrowers is slightly below the bank's overall market share and exceeds the market share for loans to moderate-income borrowers.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of loans to small businesses is good. SNBT's lending to small loans to businesses with revenues less than \$1 million is near the percentage of businesses in the Springfield AA with revenues of \$1 million or less. The bank's market share of lending to businesses with revenues of \$1 million or less is higher than its market share for overall small business lending. Additionally, SNBT has a high percentage of loans small in size, or amounts of \$100 thousand or less.

Small Loans to Farms

Refer to Table 12 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

The borrower distribution of loans to small farms is good. SNBT's percentage of lending to farms with revenues of less than \$1 million is consistent with the percentage of farms in the Springfield AA. The bank's market share to farms with annual revenues of less than \$1 million is consistent with its market share for overall farm lending. Additionally, SNBT has a high percentage of loans small in size, amounts of \$100 thousand or less.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans.

CD lending had a positive impact on the Lending Test conclusions. In the AA the primary CD lending needs included affordable home purchase, home improvement, and economic development loans.

SNBT's CD lending includes a loan for economic development.

SNBT originated a loan in the amount of \$850 thousand for the re-construction of the historic City Building. This building is located in an Enterprise Zone in a low-income census tract in the center city. The project is a catalyst to downtown redevelopment and provides jobs in a low-income area.

SNBT originated other loans and letters of credit that had community development attributes and were beneficial to the community; however, these loans and letters of credit did not meet the definition of CD.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions. SNBT offers a flexible mortgage-related lending program serving low- and moderate-income borrowers and an agricultural link program that serves farmers in the AA.

The "Affordable Housing" program is initiated by SNBT for borrowers who wish to purchase and occupy single-family homes. The maximum loan amount is \$75 thousand. The maximum down payment is five percent of the purchase price. The loans are subject to reduced closing costs of \$750, and no private mortgage insurance is required. Borrowers using this program are allowed a housing expense ratio of 30 percent and total debt ratio of 40 percent of gross income. A reduction of 0.25 percent on the interest rate is given to borrowers that elect the bank's automatic mortgage payment plan. During the evaluation period, SNBT originated five loans totaling \$308 thousand.

The “Agricultural Link Program” is for farm operating needs and the interest rate is reduced by an average of 1.25 percent. SNBT’s lowest rate in 2003, thus far, is 3.5 percent. During the evaluation period, SNBT originated 73 loans totaling \$6.4 million. Its purpose is to provide reduced-rate financing to Ohio farmers to help offset the high cost of borrowing operating funds. The programs guidelines are as follows: the farm must be headquartered in Ohio; maintain 51 percent of all land and or operating facilities in Ohio; be organized for profit; complete the required application; and the borrower must apply through an eligible lender by the specified deadline.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Fayette AA is weaker than the bank’s overall performance. SNBT’s lending in the Fayette AA is not inconsistent with the bank’s overall “High Satisfactory” performance. Refer to Tables 1 through 12 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Investment Test is rated “Low Satisfactory”. This is based on SNBT’s performance in the Springfield AA, which received a full-scope review. Total investments during the evaluation period were \$819 thousand. The bank’s performance in the Springfield AA is adequate.

Refer to Table 13 in Appendix C for the facts used to evaluate the bank’s level of qualified investments.

SNBT’s parent, PNC consistently invests in Ohio Equity Fund limited partnerships. These funds provide equity capital for investments in low-income housing developments throughout Ohio. The funds are administered by the Ohio Capital Corporation for Housing who construct, rehabilitate, and preserve affordable housing in Ohio. The bank’s portion of investments in the 11 partnerships totaled \$738 thousand during the examination period. These investments are considered complex but not innovative.

Qualified grants and contributions during the examination period totaled \$81 thousand. These investments are diversified among organizations providing social and housing services to low- and moderate-income individuals.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope review, the bank’s performance under the Investment Test in the Fayette AA is weaker than the bank’s overall performance. The opportunities for investment in this AA are limited. SNBT did not make any qualified investments in the Fayette AA during the evaluation period. However, SNBT’s lack of qualified investments in the AA did not impact the overall Investment Test rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Springfield AA is good.

Retail Banking Services

Refer to Table 14 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems are accessible to geographies and individuals of different income levels in the AA. SNBT has good banking hours that provide customers with flexible and convenient hours. Financial services are offered at each branch and business hours do not vary in a way that inconveniences any portion of the AA, particularly low- and moderate-income geographies and individuals. The bank has a good level of CD services.

The bank's distribution of branches in low- and moderate-income geographies exceeds the distribution of the population living in those geographies. During the evaluation period there was no branch opening or closing activity.

SNBT's deposit products include a "no minimum balance" checking and savings account to all its customers and a low-cost checking account for senior citizens age 62 years and older. There is no maintenance fee for seniors. The bank also cashes checks for non-bank customers. There is no fee for cashing checks for non-customers.

SNBT's ATM network offers an alternative delivery system for providing retail-banking services to low- and moderate-income individuals and in low- and moderate-income geographies. In the AA, the percentage of full service ATMs in the low- and moderate-income geographies exceeds the percentage of the population residing in those geographies.

SNBT offers the Security Direct 24-Hour Telephone Banking service. This service allows customers to check balances, transfer funds within the bank, and make loan payments. It does not include a bill pay feature. SNBT also offers online banking that permits account access via the Internet. This service allows customers to check balances, access account history, transfer funds between accounts, and pay bills. Several of these services are specifically tailored to meet the needs of low- and moderate-income geographies and individuals.

SNBT's alternative delivery systems are not specifically targeted to low- and moderate-income families and geographies. Since data on how these systems affect low- and moderate-income individuals and geographies was not available, significant weight could not be placed on this area when drawing conclusions on the Service Test.

Community Development Services

SNBT's performance in providing CD services to the AA was good because they meet a wide range of community needs.

The bank's CD services focused on revitalizing downtown Springfield (a low-income geography), providing expertise and advice to small businesses, and serving on organizations that provide housing for low- and moderate-income persons. A summary of these services is detailed below.

The Center City Association is a non-profit corporation that supports the redevelopment of the center city of Springfield, which is a low-income geography. Its objectives include helping to increase and diversify the economic base, and working with city government and private landowners to improve downtown's appearance and business activity. One of the bank's officers assists this association with identifying methods to attract new businesses, including small businesses, to the downtown area.

The Small Business Development Corporation assists small businesses with obtaining financing and provides technical support. Two of the bank's loan officers assist this corporation with managing its lending to small businesses and provide other services including budgeting, personnel, and tenant issues.

The Housing Connection of Clark County, Inc. - Community Living Services is an organization that provides a variety of services that enable people with developmental disabilities to live independently in the community. The organization serves approximately 150 disabled persons. A bank employee acts as a board member assisting with financial and planning matters.

The Clark County Fair Housing Board is a program to promote and ensure equal housing opportunities to all residents of the City of Springfield. Goals are to inform housing consumers that housing markets are open to all without bias and assist consumers in securing fair housing rights when the experience housing discrimination. A bank employee serves as a board member assisting in financial and budgeting issues.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Fayette AA is weaker than the bank's overall "High Satisfactory" performance under the Service Test. In the Fayette AA; however, SNBT's branch distribution did not impact the overall service test rating. SNBT has only one branch located in a middle-income geography and has minimal deposits in the AA. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/00 to 12/31/02 Investment and Service Tests and CD Loans: 05/16/00 to 8/25/03	
Financial Institution	Products Reviewed	
Security National Bank and Trust Company (SNBT)	Home Mortgage Loans Small Business Loans Small Farm Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	NA	NA
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Clark, Miami, & Green Counties (Springfield AA) Fayette AA (Census Tracts 9858.00 and 9859.00)	Full Scope Limited Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Springfield AA

Demographic Information for Full-Scope Area: Springfield AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	99	6%	18%	55%	18%	2%
Population by Geography	377,461	4%	18%	58%	20%	0%
Owner-Occupied Housing by Geography	144,600	2%	13%	61%	24%	0%
Businesses by Geography	1,971	5%	15%	56%	24%	0%
Farms by Geography	387	1%	8%	73%	18%	0%
Family Distribution by Income Level	104,313	18%	18%	26%	37%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	38,768	8%	24%	59%	9%	0%
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$36,514 = \$60,200 = 10%	Median Housing Value Unemployment Rate (July 2003)				\$64,757 = 6.2%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

SNBT's AA consists of all of Clark, Greene, and Miami Counties, which is part of the Dayton-Springfield MSA. The AA excludes all of Montgomery County because of the dominance of the City of Dayton located in the center of that county. Dayton is approximately 30 miles from Springfield and contains several large financial institutions. Competition is strong and SNBT concentrates on those counties adjacent to its headquarters. SNBT has 15 offices and 11 full service ATMs. The full service ATMs are located at 9 of the 15 branch offices and the remaining two ATMs are located at off premise sites.

As of June 30, 2002, 98 percent of SNBT's deposits were derived from this AA. Over the evaluation period, 82 percent of home mortgage loans, 99 percent of small loans to businesses, and 96 percent of small loans to farms were derived from this AA. SNBT's deposits in the Dayton/Springfield MSA total approximately \$632 million. Based on FDIC

deposit market share data as of June 30, 2002, this equates to a 19 percent deposit market share, which ranks SNBT as the second largest deposit taking institution in the MSA.

Clark, Greene, and Miami counties are located in southwestern Ohio. The local economy is fair to good. As of July 2003, the unemployment rates for Clark, Greene, and Miami counties (6.6 percent, 5.0 percent, and 6.3 percent, respectively) were above average in comparison to the state of Ohio's unemployment rate of 6.2 percent. Employment within Clark, Greene, and Miami counties is distributed among service, trade, manufacturing, government, and other sectors. In 2000, the average weekly earnings for all industrial groups were \$545. The major employers are Navistar International, Clark County, Ohio, Springfield City Board of Education, Community Hospital, Mercy Medical Center and the City of Springfield Ohio. The city of Springfield can attract employees from the entire Miami Valley regional pool and from surrounding areas like Columbus due to its central location. Over 14,500 workers commute into the city of Springfield.

In SNBT's AA, approximately 10 percent of families were living below the poverty level as of 1990. It is especially difficult for this segment of the population to afford and maintain a home.

Housing in the AA is not affordable. Based on current interest rates, the updated HUD median family income of \$60,200, and traditional lending terms, an individual who earns 50 percent of the median family income would have difficulty meeting the credit requirements to be able to purchase a \$90,000 home within the MSA. In 2000, the median housing value rose to \$106,000 for the AA.

This AA has six low-income census tracts (1.00, 2.00, 3.00, 9.01, 9.02 and 12.00). Dunn and Bradstreet data indicates that 11 farms are located in these six census tracts. Three of these tracts (2.00, 3.00, and 3.00) are located in downtown Springfield and contain no farms. The fourth tract (9.01) consists mostly of commercial warehouses and a horse harness racing track and contains few, if any, farms. Consequently, the opportunity to make small loans to farms in these four census tracts is minimal.

SNBT's AA includes an Ohio designated Enterprise Zone which is located in close proximity to downtown Springfield. There are numerous state tax incentives offered to businesses and individuals that reside within the zone. These include the following:

Building materials used in remodeling, rehabilitation, or new construction within the zone are exempt from sales and use taxes.

Machinery, equipment, and commercial vehicles purchased, leased, or rented by qualified businesses located within the zone are exempt from sales, use, and motor vehicle usage tax.

Qualified businesses are allowed a tax credit equal to 10 percent of the wages paid to each employee who has been unemployed for at least 90 days or who has received public assistance benefits for at least 90 days prior to being employed, up to \$1,500 per employee.

Two community contacts were made during the evaluation. These contacts included two government officials, one representing the business and economic development area, and one representing the consumer and housing area. Based on these contacts we determined that the opportunities for qualified investments, and CD loans are moderate and the opportunities

for CD services are good. Opportunities for qualified investments other than donations and grants are somewhat limited due to competition from large banks.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the Metropolitan Area/Assessment Area (MA/AA). Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As 12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/AA column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also

presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Home Mortgage Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that

amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As .12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/AA column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 14. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF OHIO				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002						
Metropolitan Area/Assessment Area (MA/AA) (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Springfield AA	98.79%	1,308	\$77,065	1,971	\$173,509	387	\$28,632	1	\$850	3,666	\$279,206	98%
Limited Review:												
Fayette AA	1.21%	21	272	9	\$ 424	15	827	0	0	45	\$1,523	2%

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From May 16, 2000 to August 25, 2003.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: 6594

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF OHIO				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
Metropolitan Area/Assessment Area (MA/AA):	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Springfield AA	216	100.00	2.43	0.00	13.10%	9.72%	61.13%	80.56%	23.34%	9.72%	0.58%	0.00%	0.42%	0.90%	0.16%
Limited Review:															
Fayette AA	0	0.00	0.00	0.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Institution ID: 6594

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
Metropolitan Area/Assessment Area (MA/AA):	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Dayton/Springfield MSA	389	95.58%	2.43%	4.63%	13.10%	14.14%	61.13%	74.81%	23.34%	6.43%	8.53%	16.28%	7.20%	11.04%	2.08%	
Limited Review:																
Fayette County	18	4.42%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%	0.00%	0.00%	26.47%	0.00%	0.00%	26.47%	0.00%	

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
Metropolitan Area/Assessment Area (MA/AA):	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Springfield AA	700	99.57	2.43%	2.29%	13.10%	11.57%	61.13%	78.86%	23.34%	7.29%	0.84%	1.20%	0.74%	1.15%	0.29%	
Limited Review:																
Fayette AA	3	0.43%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%	0.00%	0.00%	0.88%	0.00%	0.00%	0.88%	0.00%	

^{*} Based on 2001 Peer Mortgage Data: Central Region.

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

^{***} Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
Metropolitan Area/Assessment Area (MA/AA):	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans						
Full Review:																
Springfield AA	3	100.00%	7.82%	0.00%	20.68%	66.67%	58.36%	33.33%	13.14%	0.00%	4.76%	0.00%	0.00%	8.33%	0.00%	
Limited Review:																
Fayette AA	0	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	

^{*} Based on 2001 Peer Mortgage Data: Central Region.

^{**} Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

^{***} Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF OHIO															
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002															
Metropolitan Area/Assessment Area (MA/AA):	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Springfield AA	1,971	99.55%	4.92%	10.10%	14.96%	18.37%	55.80%	65.55%	24.33%	5.99%	11.42%	27.62%	16.57%	13.39%	3.07%
Limited Review:															
Fayette AA	9	0.45%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%	0.00%	0.00%	0.61%	0.00%	0.00%	0.76%	0.00%

^{*} Based on 2001 Peer Small Business Data: US&PR.

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

^{***} Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: STATE OF OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
Metropolitan Area/Assessment Area (MA/AA):	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans						
Full Review:																
Springfield AA	387	96.27%	0.80%	0.52%	7.92%	20.16%	73.57%	71.83%	17.65%	7.49%	45.28%	100.00%	67.35%	43.33%	30.77%	
Limited Review:																
Fayette AA	15	3.73%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%	0.00%	0.00%	7.81%	0.00%	0.00%	8.06%	0.00%	

^{*} Based on 2001 Peer Small Business Data: US&PR.

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

^{***} Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share [*]				
Metropolitan Area/Assessment Area (MA/AA):	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Springfield AA	216	100.00%	18.94%	20.57%	18.22%	21.05%	25.53%	31.58%	37.31%	26.79%	0.62%	1.40%	0.56%	0.49%	0.49%	
Limited Review:																
Fayette AA	0	0.00%	24.40%	0.00%	19.49%	0.00%	24.91%	0.00%	31.20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	

^{*} Based on 2001 Peer Mortgage Data: Central Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 3.24% of loans originated and purchased by BANK.

^{***} Percentage of Families is based on the 1990 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share [*]				
Metropolitan Area/Assessment Area (MA/AA):	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{**}						
Full Review:																
Springfield AA	389	95.58%	18.94%	26.25%	18.22%	26.77%	25.53%	30.71%	37.31%	16.27%	8.36%	16.53%	9.90%	7.95%	3.88%	
Limited Review:																
Fayette AA	18	4.42%	24.40%	11.11%	19.49%	27.78%	24.91%	38.89%	31.20%	22.22%	26.47%	50.00%	33.33%	38.46%	7.69%	

^{*} Based on 2001 Peer Mortgage Data: Central Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 1.97% of loans originated and purchased by BANK.

^{***} Percentage of Families is based on the 1990 Census information.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share [*]				
Metropolitan Area/Assessment Area (MA/AA):	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Springfield AA	700	99.57%	18.94%	12.82%	18.22%	27.87%	25.53%	29.21%	37.31%	30.10%	0.94%	0.84%	1.36%	0.84%	0.79%	
Limited Review:																
Fayette AA	3	0.43%	24.40%	100.00%	19.49%	0.00%	24.91%	0.00%	31.20%	0.00%	0.52%	5.88%	0.00%	0.00%	0.00%	

^{*} Based on 2001 Peer Mortgage Data: Central Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 4.27% of loans originated and purchased by BANK.

^{***} Percentage of Families is based on the 1990 Census information.

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

Institution ID: 6594

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF OHIO			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
Metropolitan Area/Assessment Area (MA/AA):	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Springfield AA	1,971	99.55%	81.12%	77.73%	79.81%	11.36%	8.83%	11.42%	20.81%
Limited Review:									
Fayette AA	9	0.45%	82.80%	100.00%	88.89%	11.11%	0.00%	0.61%	1.43%

^{*} Based on 2001 Peer Small Business Data: US&PR.

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

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.96% of small loans to businesses originated and purchased by the bank.

Institution ID: 6594

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF OHIO			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
Metropolitan Area/Assessment Area (MA/AA):	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Springfield AA	387	96.27%	96.66%	94.83%	82.17%	10.85%	6.98%	45.28%	45.82%
Limited Review:									
Fayette AA	15	3.73%	97.48%	100.00%	93.33%	0.00%	6.67%	7.81%	8.06%

^{*} Based on 2001 Peer Small Business Data: US&PR.

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

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.24% of small loans to farms originated and purchased by the bank.

Institution ID: 6594

Table 13. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: STATE OF OHIO									
Evaluation Period: MAY 16, 2000 TO AUGUST 25, 2003									
Metropolitan Area/Assessment Area (MA/AA):	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Springfield AA	0	0	39	\$819	39	\$819	100.00%	0	\$0
Limited Review:									
Fayette AA	0	0	0	0	0	0	0.00%	0	0

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

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

Institution ID: 6594

Table 14. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
				Geography: STATE OF OHIO				Evaluation Period: MAY 16, 2000 to AUGUST 25, 2003									
Metropolitan Area/Assessment Area (MA/AA):	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Springfield AA	19%	14	93%	14.29%	21.43%	57.14%	7.14%	0	0	0	0	0	0	4.47%	17.40%	58.21%	19.93%
Limited Review:																	
Fayette AA	100%	1	7%	0.00%	0.00%	100.00%	0.00%	0	0	0	0	0	0	0.00%	0.00%	100.00%	0.00%