
Comptroller of the Currency
Administrator of National Banks

LARGE BANK

PUBLIC DISCLOSURE

June 7, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**The Second National Bank of Warren
Charter Number 2479**

**108 Main Street
Warren, Ohio 44482**

**Office of the Comptroller of the Currency
Cleveland Field Office
Three Summit Park, Suite 530
Independence, Ohio 44131-6900**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

I. General Information	01
II. Institution	
Overall Rating	01
Lending, Investment, and Service Test Table.	02
Description of Institution	02
Description of Assessment Area	03
Conclusions with Respect to Performance Tests	07
III. Appendix	
Definition of Terms.	29
Content of Standardized Tables	30
Table 1 - Lending Volume	32
Tables 2, 3, and 4 - Geographic Distribution of Residential Real Estate Loan Originations.	33
Table 5 - Geographic Distribution of Small Business Loan Originations.	36
Table 6 - Geographic Distribution of Small Farm Loan Originations.	37
Tables 7, 8, and 9 - Borrower Distribution of Residential Real Estate Loan Originations	38
Table 10 - Borrower Distribution of Small Business Loan Originations.	41
Table 11 - Borrower Distribution of Small Farm Loan Originations	42
Tables 12 - Qualified Investments	43
Table 13 - Distribution of Branch and ATM Delivery Systems	44
Table 14 - Geographic and Borrower Distribution of Consumer Loan Originations	45

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, 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 Community Reinvestment Act (CRA) performance of **The Second National Bank of Warren** (SNB) prepared by **The Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **June 7, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all, of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 25.

SNB received a rating of "Satisfactory" at the last CRA examination dated February 24, 1997.

INSTITUTION

INSTITUTION'S CRA RATING: This institution is rated "**Satisfactory**" record of meeting community credit needs".

The following are the primary factors supporting SNB's performance under the Lending, Investment, and Service Tests:

- Substantial majority of home mortgages made within the assessment areas;
- Good responsiveness to the home mortgage needs within the assessment areas;
- Adequate geographic distribution and borrower distribution for HMDA, small business and consumer loans;
- Adequate level of community development lending activity;
- Adequate level of investments;
- Reasonable delivery systems accessible to geographies and individuals of different income levels in the assessment areas; and

- Adequate level of community development services provided.

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

Performance Levels	The Second National Bank of Warren Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Non Compliance			

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

DESCRIPTION OF INSTITUTION

SNB is a full service financial institution headquartered in Warren, Ohio. It is an Intrastate Bank. It has 35 full service branches, 32 automated teller machines (ATMs), and one loan production office in Ohio.

In the fourth quarter 1998 the bank entered the Steubenville-Wierton area through an acquisition of Trumbull Savings and Loan (Warren, Ohio), a \$462 million financial institution. The bank acquired seven branches in this acquisition.

There are no current financial or legal conditions that hamper SNB's lending, investment or service performance. As of December 31, 1998, SNB had total assets of \$1.4 billion, net income of \$10.7 million and a return on average assets of .75%. The bank's Tier 1 capital is \$102 million. The bank reached its billion-dollar mark during 1998 after the acquisition of Trumbull Savings and Loan.

SNB's primary lending focus is directed on residential real estate lending. As of December 31, 1998, the loan portfolio's \$970 million in gross loans consist of residential real estate 47%, commercial real estate 22%, consumer 16%, commercial 12%, farm and other lending is less than 1%. SNB provides a wide array of home mortgage products including Federal Housing Agency (FHA) and Veterans Administration (VA) loans.

DESCRIPTION OF ASSESSMENT AREAS

SNB has identified four assessment areas (AA) that are described in detail below. These AA include parts of Trumbull, Mahoning, Ashtabula, Portage, Summit, and Stark Counties. Trumbull and Mahoning Counties are included in the Youngstown-Warren, Ohio (MSA 9320), and Portage and Summit Counties are included in the Akron, Ohio (MSA 080), Ashtabula, Medina, and Cuyahoga Counties are part of the Cleveland-Elyria-Lorain, Ohio (MSA 1680), and Jefferson County is part of the Steubenville-Weirton, OH-WV (MSA 8080). The assessment areas (AA) are consistent with CRA regulatory requirements. Low- and moderate- income areas are not arbitrarily excluded and no evidence of illegal discrimination was noted in the compilation of the assessment areas.

The *Youngstown-Warren Area* consists of 131 census tracts in the Youngstown-Warren Metropolitan Statistical Area (MSA 9320). This area includes all of Trumbull and Mahoning Counties. SNB has branches in both counties. The bank has no branches in Columbiana County and it is not included in the AA. Of the 131 tracts, 15 are low- income, 24 are moderate- income, 58 are middle- income, 29 are upper- income, and five are N/A. SNB has 15 full service branches and 14 ATMs in this assessment area. This area contains 44% of the bank's branches. SNB has 65% of its deposits in this assessment area.

Trumbull County is the bank's primary lending area. This area contains the bank's main lending area and the highest number of HMDA originations in all of the bank's assessment areas. Trumbull County only contains one low- income tract and six moderate- income tracts. Mahoning County contains the majority of the low- and moderate- income areas in this assessment area.

This AA is primarily urban. The 1990 Census Bureau lists the population at 492,619 persons that comprises 136,488 families. Housing units consist of 68% that are owner-occupied. The housing units are primarily one-to-four family. The percent of families below poverty level is 14%. The Department of Housing and Urban Development's (HUD's) Updated Median Family Income for 1998 is \$40,300. According to Business Demographic Data by Dunn and Bradstreet, during 1998, there were 15,106 businesses, including 352 agricultural-related entities, located within this assessment area. Prominent industries are service and retail. Major employers are General Motors, Delphi Packard, and Forum Health.

As of May 1999, the Trumbull County unemployment rate of 4.4% and the Mahoning County unemployment rate of 4.9% are both higher than the State of Ohio unemployment rate of 3.7%. Historically, the Youngstown area was dominated by the steel industry. The downturn of the steel industry in the 1970's left Youngstown with a very depressed local economy. From that time until now, this area has been attempting to rebuild its economic base. The City of Youngstown historically experiences high unemployment. It's unemployment rate of 8.6% for May 1999 is higher than the

County and State of Ohio unemployment rates.

The *Akron Area* consists of 154 census tracts in the Akron Metropolitan Statistical Area (MSA 0080). This area consists of all of Summit and Portage counties. This AA also includes 6 tracts in Stark County in the Canton-Massillon Metropolitan Statistical Area (MSA 1320). This area was included because it represents a small part of Stark county and it is contiguous to the Akron MSA. Of the 154 census tracts, 20 are low- income, 28 are moderate- income, 70 are middle- income, 33 are upper-income, and 3 are N/A. SNB has 11 full-service branches and 11 ATMs in this assessment area. This area contains 32% of the bank's branches. SNB has 13% of its deposits in this assessment area.

Summit County contains the majority of low- and moderate- income tracts in this AA.

This AA is primarily urban interspersed with small rural areas. The 1990 Census Bureau lists the population at 698,374 that comprises 188,493 families. Housing units consist of 66% that are owner-occupied. The percent of families below the poverty level is 12%. The Department of HUD's Updated Median Family Income for 1998 is \$46,503. According to Business Demographic Data by Dunn and Bradstreet, during 1998, there were 25,228 businesses, including 562 agricultural-related entities, located within this assessment area. Prominent industries are health services, finance, manufacturing, rubber and polymers, and government. Major employers include Goodyear Tire & Chemical Company, University of Akron, Akron City Schools and Summa Health Systems. As of May 31, 1999, the 3.1% unemployment rate for Portage County and the 3.6% unemployment rate for Summit County were in line with the State of Ohio unemployment rate of 3.7%.

The *Cleveland Area* consists of 35 census tracts in the Cleveland Metropolitan Statistical Area (MSA 1680). This area includes all of Ashtabula, and portions of Cuyahoga and Medina Counties. Of the 35 tracts, 1 is low- income, 11 are moderate- income, 11 are middle- income, 8 are upper- income, and 4 are N/A. SNB has 6 full-service branches and 5 ATMs in this assessment area. This area contains 18% of the bank's branches. SNB has 13% of its deposits in this assessment area.

In this AA the bank has its greatest lending and deposit activity in Ashtabula County. Ashtabula has one low- income tract and ten moderate- income tracts.

This AA is a mixture of urban and rural communities. The 1990 Census Bureau lists the population at 141,570 that comprises 39,066 families. Housing units consist of 66% that are owner-occupied. The housing units are primarily one-to-four family. The percent of families below poverty level is 12%. The Department of HUD's Updated Median Family Income for 1998 is \$49,400. According to Business Demographic Data by Dunn and Bradstreet, during 1998, there were 5,687 businesses, including 152 agricultural-related entities, located within this assessment area. Prominent industries are plastics, hospitals, and insurance. Major employers include Molded Fiberglass Company, Nestle Foods, and Westfield Insurance Companies. As of

May 31, 1999, the area unemployment rate of 4.1% is higher than the State of Ohio unemployment rate of 3.7%.

The *Steubenville Area* consists of 24 census tracts in the Steubenville Metropolitan Statistical Area (MSA 8080). This area includes all of Jefferson County which comprises the entire MSA. Of the 24 tracts, four are low- income, three are moderate- income, 14 are middle- income and three are upper-income. SNB has two full-service branches and one ATM. This area contains 6% of the bank's branches. SNB has 9% of its deposits in this assessment area.

This AA is primarily urban. The 1990 Census Bureau lists the population at 80,298 persons that comprise 22,744 total families. Housing units consist of 68% that are owner-occupied. The percent of families below the poverty level is 18%. The Department of HUD's Updated Median Family Income for 1998 is \$36,200. According to Business Demographic Data by Dunn and Bradstreet, during 1998, there were 1,979 businesses, including 27 agricultural-related entities, located within this assessment area. The prominent industry is steel. The major employers in the area are Wheeling-Pittsburgh Steel Company and Wierton Steel. As of May 31, 1999, the area unemployment rate of 6.5% is higher than the State of Ohio unemployment rate of 3.7%.

Deposit Share Information for SNB

Deposit share information for the AA was ascertained using deposit information provided by the Federal Deposit Insurance Corporation as of June 30, 1998. The information is listed by county. It lists total deposits, the number of bank offices within and outside of the county, and the bank's market share within the county. This information is used as a tool for assessing relative size of the bank. It is not a measure of the bank's CRA performance.

In the Youngstown-Warren MSA, specifically Trumbull County, SNB has a very strong presence with a 15.30% deposit market share. This represents the second highest deposit market share in the County. The other counties in the assessment areas show very limited deposit market shares of less than one percent, except in the Akron MSA, Portage County. In Portage County, SNB has the fifth largest deposit market share, 9.50%. This information does not include Jefferson County that became part of the bank's assessment during the latter part of 1998. The deposit information that is provided in Table 1 - Lending Volume and Table 13 - Distribution of Branch and ATM Delivery System were based on recent internal bank records.

Competition

Competition in the bank's assessment areas is strong. In its main market, Trumbull County, SNB competes with many other similarly situated financial institutions such as First Federal Savings and Loan and the local credit union. In Mahoning County, SNB's competition includes The Mahoning National Bank and Home Federal Savings and Loan. In Mahoning County SNB has a limited number of branches that makes it difficult for the bank to penetrate the market. In the Akron MSA, the dominant

competitor is FirstMerit, N.A, a large regional bank. It is important to note that SNB's activities in the Akron MSA are also affected by its limited presence there. SNB's 11 offices in that area are not significant in relation to the number of offices held by many other financial institutions.

Our evaluation took into consideration information derived from members of the community. During the examination, three contacts were made with representatives from economic development and community service groups. We also used one contact that was made by our office over the last year. The groups noted the following as credit needs in the assessment area: affordable housing, housing rehabilitation (home- improvement), and creating permanent jobs.

Additionally, areas considered a "brownfield" need cleanup. A brownfield is an abandoned, idled, or under-used industrial and commercial facility where expansion, redevelopment, or reuse is complicated by real or perceived environmental contamination.

Opportunities for qualified investments, community development loans and community development services do exist within the bank's assessment area. These opportunities include low- income housing tax credits, non-profit housing organizations and non-profit organizations that provide social services to low- and moderate- income individuals. No opportunities currently exist to purchase community development municipal bonds. No local opportunities were identified for investments in affordable housing revenue bonds or community development corporations.

Evaluation Scope

This evaluation covers Home Mortgage Data Act (HMDA) reportable loans and small business lending performance from January 1, 1997 to December 31, 1998. We also included data on the bank's motor vehicle consumer loans as requested by bank management. The data used for community development lending, investments, and services covers January 1, 1997 to June 7, 1999.

We could not rely on the bank's reported revenue for small business loans due to a significant amount that could not be verified. As a result, this data was given limited consideration in the overall rating of the bank. Small business loans do not constitute a major part of the bank's overall loan portfolio. Additionally, data on farm lending is included in the Tables in the Appendix section of the Performance Evaluation. However, due to limited activity, farm loans are not evaluated herein.

Throughout this evaluation, home mortgages, specifically home purchase and home- improvement, were given greater consideration in the overall rating as they were identified as strong credit needs by community contacts. Home mortgage lending is the bank's primary lending focus. Market comparisons in this review consist of either the 1997 HMDA or 1997 Small Business Reporters serving the same geographic areas as the bank.

Full-scope reviews were performed on the following MSAs; Youngstown-Warren, Cleveland-Elyria-Lorain, and Akron. A limited-scope review was performed on the Steubenville-Wiarton MSA. The Youngstown-Warren MSA was given the greatest consideration in the evaluation of the Performance

Tests. This area is the bank's main market for lending and deposit taking. The bank is also headquartered in this MSA.

Numeric data on the bank's Lending, Investments, and Service activity are contained in the Tables in the Appendix Section of this Public Evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Lending Activity

SNB's origination of residential mortgages shows good responsiveness to the assessment areas' need for these types of loans. From 1997 to 1998 the bank's volume of HMDA originations increased by more than 100%. The increase is attributable to loans acquired from Trumbull Savings and Loan. During our examination, we placed the greatest emphasis on the number of loans originated.

During the review period, SNB originated the substantial majority of its loans, 87% (3,539) of HMDA loans and 84% (1,023) of small business loans, within its assessment areas. Also, the bank originated a total of 7,652 motor vehicle loans. Of this amount 5,294 or 69% were made within SNB's assessment areas. Additionally, the bank made 15 small farms, and 12 community development loans. The total number of loans originated were 4,589 amounting to \$389.8 million. *See Table 1 on page 32 for details.*

The bank's overall lending is considered adequate. Primary emphasis was placed on the bank's HMDA lending, particularly home purchase and home-improvement loans.

Geographic Distribution

SNB's overall HMDA, small business, and motor vehicle geographic distribution is adequate.

The bank's distribution of home purchase loans, particularly in low- and moderate- income geographies in the Youngstown-Warren MSA and moderate- income geographies in the Akron MSA is fair. Some mitigating factors that affect the bank's ability to lend are the demographics of the areas. The bank's performance in home-improvement originations is fairly consistent with the demographics of the assessment areas. Detail is provided in the individual sections for Youngstown-Warren and Akron MSAs in this Performance Evaluation. *See Tables 2 - 4 on pages 33 - 35 for detail.*

The bank's distribution of small business loans in low- and moderate- income areas is fairly consistent with the percent of businesses in those areas, throughout most of the assessment areas. The bank's

distribution of small business loans in the Cleveland-Lorain-Elyria MSA is good. The bank is not primarily a small business lender. *See Table 5 on page 36 for detail.*

The bank's geographic distribution of consumer loans (motor vehicles) is adequate. With the exception of the Cleveland-Elyria-Lorain MSA, the bank's distribution of consumer loans in low- income geographies is less than the percent of population in low- income geographies in the assessment area. However, the bank's originations in moderate- income geographies are fairly consistent with the demographics of the assessment areas. The bank's distribution of motor vehicle loans in the Cleveland-Elyria-Lorain MSA is good. The consumer market is highly competitive throughout the bank's assessment areas. *See Table 14 on page 45 for detail.*

Borrower Characteristics

The distribution of SNB's HMDA is adequate. However, the bank's HMDA originations to low-income families within its assessment areas, particularly Youngstown-Warren and Akron MSAs, is fair. The bank's performance to moderate- income borrowers is consistent with the demographics. See detail in the Youngstown-Warren and Akron MSA sections in this Performance Evaluation.

The bank's motor vehicle distributions are adequate. SNB's distribution of motor vehicle loans to low-income borrowers is strong in the Akron and Cleveland-Elyria-Lorain MSAs. The bank's distribution of consumer loans to moderate- income borrowers is fairly consistent with the percent of moderate-income households in the Youngstown-Warren and Akron MSAs.

The bank's distributions of small business loans of varying sizes are adequate based on the high level of competition and the fact that the bank is not primarily a small business lender.

Community Development Lending

SNB has an adequate level of community development loans given its size and capacity, and the high level of competition from other local financial institutions. The main community development opportunity taken by the bank was providing affordable housing loans. This was identified as a strong credit need by community groups. The bank has been most active in its main assessment area, the Youngstown-Warren MSA. Besides, mini loan funds, there were limited opportunities identified for economic development. During the review period, SNB made 12 loans totaling \$2.5 million. Community development is detailed elsewhere in this Performance Evaluation. *Also see Table 1 on page 32 for detail.*

Flexible Lending Products

SNB uses flexible lending products to serve assessment area credit needs.

SNB offers a home purchase product (Own Your Own Home) which is designed for low- and moderate- income persons. The plan is a standard product that has less stringent down payment requirements and no origination fees. In addition, the program requires that the sales price of the home be \$65,000 or less. A down payment of 5% and private mortgage insurance were required during 1997 and 1998. The plan is considered flexible and is similar to products offered by SNB's peers. The bank extended 26 of these loans totaling \$1,018,879.

With SNB's acquisition of Trumbull Savings Bank, it inherited three flexible mortgage plans called, Smart Start. These plans are similar to SNB's Own Your Own Home, except that the Smart Start programs have varying down payments from 3% to 5%. Two of the three programs require private mortgage insurance. The bank extended 51 of these loans totaling \$2,066,900.

In conjunction with the City of Warren's Community Development Department, the bank assists in providing down payment assistance to low- and moderate- income borrowers. This program is for homeowners buying homes through Housing and Urban Development (HUD). Participating banks provide 50% of the down payment with the remainder supplied by the local government. This program has been in place for four years. The total number and dollar amount of loans were not available.

SNB participates in the Small Business Administration Loan Program. During the review period, the bank made 113 SBA loans totaling \$16,262,000. These loans are included in the small business loans previously mentioned. The program is beneficial throughout the assessment areas, particularly in low- and moderate- income geographies. The program acknowledges borrowers with higher risks that normally would not qualify under traditional underwriting standards due to the lack of established credit or adequate collateral values.

SNB has a consumer loan product, Express Loan. This product is designed for low- and moderate-income customers. The bank modified its conventional underwriting to allow for a higher debt to income ratio, lower down payment, and lower minimum loan amount. The total number and dollar amount of consumer activity were not available.

INVESTMENT TEST

SNB's has an adequate level of qualified investments given its size and capacity. Affordable housing was identified as a primary credit need by community contacts. The bank has one Ohio statewide low-income housing tax credit that was noted in the previous CRA review. Additionally during this review period, the bank purchased its main qualified investment, a \$1 million tax credit for affordable housing through the Ohio Capital Corporation for Housing Limited Partnership VIII. One of this Corporation's projects will include an affordable housing project for low- income families in Portage County. Other

qualified investments in the assessment areas are donations. SNB participated in some of the investment opportunities identified in the bank's assessment areas. Opportunity exists with various other community service organizations and community development groups that provide services to low- and

moderate- income persons. No local school, low- income housing, or redevelopment bonds targeted to low- and moderate- income families or geographies were identified during the examination. The bank's qualified investments are not considered innovative or complex. SNB's qualified investments total \$1.8 million. *See Table 12 on page 43 for detail.*

SERVICE TEST

SNB has reasonable delivery systems accessible to geographies and individuals of different income levels in the assessment areas. Services and business hours do not vary in a way that inconveniences any portions of the assessment areas, particularly low- and moderate- income individuals. However, the bank has no branches or ATMs in low- income geographies in its assessment areas, except for one branch and ATM in Steubenville, Ohio. The lack of representation in low- income geographies is considered important as those geographies represent a significant number. The bank's low- income branch represents 3% of its total branches that is much lower than the 12% of low- income census tracts in the assessment areas. SNB's representation in moderate- income geographies is good or consistent with the percent of population in the moderate- income geographies throughout the assessment areas. Detail is provided elsewhere in this Performance Evaluation. *Also see Table 13 on page 44 for detail.*

SNB acquired seven branches as a result of the merger with Trumbull Savings and Loan. SNB opened one branch in a middle- income geography and has not closed any branches since the previous CRA examination.

SNB offers a variety of products and services. Of particular note, the bank offers "Essential Checking Account", a deposit account with no transaction limitations, no minimum balance, and no monthly service fee. This account is not interest -bearing.

Alternative Delivery Systems

The bank has a reasonable amount of alternative delivery systems. SNB has placed two alternative delivery systems (loan origination officers) in Mahoning and Trumbull Counties with the intent of meeting the credit needs of the low- and moderate- income families. Most of SNB's delivery systems are consistent throughout the assessment areas. We could not place significant weight on these systems in drawing conclusions on the bank's CRA performance due to the lack of data on how most of these systems affect the low- and moderate- income individuals and geographies.

Alternative delivery systems include:

- ATM machines - 32 ATM machines are located throughout the assessment areas. The bank has one ATM in a low- income geography in the Steubenville MSA. The bank's percent of ATMs in moderate- income geographies within each assessment area is good in relation to the percent

of population in moderate- income geographies within those assessment areas. *See Table 13 on Page 44 for detail.*

- Interactive Voice Response System - A 24-hour telephone access system that allows customers to obtain deposit and loan account information.

- Language interpreters - Offered at no cost to customers to assist in the completion of loan applications. Spanish interpreters were utilized for four loans in the Ashtabula office in 1998.

- Loan Production Office - An office that was primarily established to help extend credit to low- and moderate- income families.

Community Development Services

SNB has an adequate level of community development services that is primarily based on the bank's activity in the Youngstown-Warren MSA. SNB has several personnel that serve on some of the main community development organizations and a few other community organizations targeted to serve low- and moderate- income families. Also, in some instances, the bank provided technical expertise and participated in housing seminars for low- and moderate- income families. A limited level of community development services is noted in other assessment areas. Little or no bank activity was noted in Mahoning, Summit, and Portage Counties.

FAIR LENDING EXAMINATION

The Fair Lending review for SNB focused on the underwriting standards used to evaluate home purchase applicants. We reviewed 100% (7) of the denied female applicants to 35 marginally approved male applicants. We reviewed the files in order to determine if female and male applicants were treated similarly during the loan application process. We found no problem with the bank's underwriting standards. We found no evidence of illegal discrimination based on the gender of the applicant. The bank was in compliance with anti-discrimination laws.

CONCLUSIONS WITH RESPECT TO YOUNGSTOWN-WARREN (MSA 9320)

This area includes 131 census tracts or 38% of SNB low- income geographies and 36% of its moderate- income geographies. This is the bank's primary assessment area. It includes the bank's main office in Trumbull County, a majority of deposits (65%), and a majority of its branches (44%). SNB's performance in this MSA was given strong consideration in the overall rating of the bank.

LENDING TEST

The bank made 2,388 HMDA loans totaling \$165 million in this assessment area (MSA 9320) that represents 67% of the total number and 64% of the total dollar of all the bank's HMDA loans. The bank ranks as the 6th largest HMDA lender with a 4% market share in this assessment area. The bank's 650 small business loans totaling \$75 million made in this assessment area represents 64% of the total number and 59% of the total dollar of all the bank's small business loans. The bank ranks as the 5th largest small business lender with an 8% market share. Forty seven percent of the bank's small farms loans (seven) and 59% of the total small farm dollars (\$703 thousand) were made in this assessment area. The bank ranks as the 4th largest small farm lender with a 9% market share in this assessment area. Primarily competitors with higher rankings have assets ranging from \$642 million to in excess of the bank's \$1.4 billion.

Geographic Distribution

SNB's overall geographic distribution is adequate. The bank's distribution of HMDA loans is adequate. However, its distribution of home purchases and refinance originations in low- and moderate- income geographies are fair. The bank's distribution of small business and motor vehicle loans is adequate.

HMDA Loans

The geographic distribution of all of the bank's HMDA loans is considered adequate when considering the demographics of the assessment area including low percent of owner-occupied units and a high poverty level. Home-improvement loans are an important credit need identified by community groups. The bank's distribution of home- improvement loans in low- and moderate- income geographies is consistent with the demographics of the assessment area. The bank has a reasonable amount of community development commitments for affordable housing loans in low- and moderate- income geographies. Affordable housing was identified as a credit need by community groups. Also, the bank has adequate HMDA market performance and is the sixth largest lender out of 159 lenders in the assessment area.

The distribution of owner-occupied units is as follows: low- income 4%, moderate- income 11%, middle- income 52%, and upper- income 33%.

SNB's home purchase originations are adequate, although the bank's loans in low- and moderate- income geographies are not consistent with the demographics of the assessment area. SNB's home

mortgage loan originations of less than 1% in low- income geographies is significantly less than the 4% owner-occupied units in low- income geographies. Some factors that affect the bank's ability to lend in these areas include a low percent of owner-occupied units, a high poverty level, and the fact that the bank has no branches in low- income geographies.

SNB's origination of 4% in moderate- income geographies is less than the 11% owner-occupied units in the assessment area. *See Table 2 on page 33 for detail.*

SNB's home- improvement originations are adequate. SNB's distribution of home-improvement loans in low- income geographies (3%) is consistent with the 4% of owner- occupied units in low- income geographies. The bank's 11% of home-improvement originations in moderate- income geographies matches the percent of owner-occupied housing units. *See Table 3 on page 34 for detail.*

SNB's refinance originations in low- and moderate- income geographies are fair and are not consistent with the demographics of the assessment area. The bank originated less than one percent of its refinance loans in low- income geographies that is lower than the 4% of owner-occupied units in low- income geographies. The bank originated 4% of its refinance loans in moderate- income geographies that is lower than the 11% of owner- occupied units in moderate- income geographies. *See Table 4 on page 35 for detail.*

Market Share - HMDA Geographies

SNB's HMDA market shares in geographies are reasonable. The bank's home purchase and refinance market shares in low- and moderate- income geographies are lower than its overall home purchase and refinance market shares. However, the bank's market share of home-improvement loans in moderate- income tracts equals the bank's overall home-improvement market share. The bank ranks among the top 15 lenders in originating home purchase and home-improvement loans in low- and moderate- income geographies. This is reasonable considering there are from 24 to 67 lenders in the assessment area. The bank ranks in the top 20 lenders in originating refinance loans. This is reasonable considering there are from 93 to 163 lenders in the assessment area. SNB is a \$1.4 million bank, banks that ranked above SNB have assets ranging from \$243 million to \$73 billion. *See Tables 2 - 4 on pages 33 - 35 for detail.*

The bank made HMDA loans in 87% of its geographies. However, there are gaps in the bank's distribution of HMDA loans in low- income geographies. The bank made loans in 53% of the low- income tracts. There are 15 low- income tracts in the assessment area. However, this is reasonable in light of the demographics of the area. The area with the least amount of lending in low- income geographies was Mahoning County. Mahoning County comprises almost half of the bank's low- and moderate- income geographies. Most of these areas are located in downtown Youngstown and adjacent areas that include a university and prison, a significant percent of low- owner occupied units, and a high poverty rate. There were no gaps in the bank's lending in moderate- income geographies.

Small Business Loans

SNB's distribution of small business originations is adequate. SNB originated 6% of its small business loans in low- income geographies that is consistent with the 8% of businesses in the area. The bank's 8% of small business originations in moderate- income geographies are fairly consistent with the 13% of businesses located in those geographies. *See Table 5 on page 36 for detail.*

Market Share - Small Business Geographies

SNB's small business market share is reasonable. The bank's small business market shares in low- income (7%) and moderate- income (6%) geographies is similar to the overall small business market share of 8%. The bank ranks as the 5th largest small business lender out of 67 lenders in this assessment area. Primarily higher market shares were held by lenders with assets significantly in excess of the bank's \$1.4 billion.

SNB's origination of small business loans did not show any conspicuous gaps. SNB made small business loans in 71% of the geographies in the assessment area. However, the bank made small business loans in 53% of the low- income geographies which is higher than its 37% of loans made in moderate- income geographies. The bank is not primarily a small business lender. This assessment area contains high competition.

Motor Vehicle Loans

SNB's distribution of motor vehicle loans is adequate. SNB's distribution of 1% of its motor vehicle loans in low- income geographies is less than the 6% of population in low- income geographies. However, the bank's 9% of motor vehicle loans in moderate- income geographies is fairly consistent with the 13% of population in moderate- income geographies. The bank's performance is not uncommon given the high level of competition in the assessment area. *See Table 14 on page 45 for detail.*

There were no conspicuous gaps in the bank's motor vehicle lending.

Borrower Characteristics

The distribution of loans to borrowers was based on the bank's originations of HMDA reportable loans to borrowers of varying incomes as compared to the percent of families, by income levels, living in the assessment area. Small business loans were analyzed by reviewing loan amounts of varying sizes. The bank's origination of consumer loans was compared to the percent of households, by income levels, within the assessment area.

SNB's overall borrower distribution is adequate. The bank's distribution of HMDA loans to borrowers

of varying incomes is adequate. The bank's small business loan amounts of varying sizes are reasonable. The bank's distribution of motor vehicle loans is adequate.

HMDA Loans

SNB's distribution of its home purchase, home- improvement, and refinance loans of varying incomes is adequate. However, the bank's percent of HMDA loans to low- income borrowers are less than the demographics of the assessment area. The bank's percent of HMDA loans to moderate- income borrowers is fairly consistent with the percent of moderate-income families in

the assessment area, particularly for home purchase and home- improvement loans. These loans are important as they were identified as credit needs by community groups. The bank's market performance is reasonable. The bank's ability to lend to low- income borrowers is hindered by the lack of adequate income and a fairly high percent of households living below poverty level.

The percent of families are as follows: low- income is 19%, moderate- income is 18%, middle- income is 22%, and upper- income is 41%.

SNB's home purchase originations are adequate. SNB's 6% of home purchase originations to low- income borrowers is fair when compared to the 19% of low- income families in the assessment area. However, the bank's origination of 20% of its home purchase loans to moderate- income borrowers exceeds the 18% of moderate- income families in the assessment area. *See Table 7 on page 38 for detail.*

SNB's home- improvement originations are adequate. SNB's 10% of home- improvement loans to low- income borrowers are less than the 19% of low- income families in the assessment area. However, the bank's origination of 17% loans to moderate- income borrowers is consistent with the 18% of moderate- income families in those areas. *See Table 8 on page 39 for detail.*

SNB's refinance originations to low- and moderate- income borrowers are fair and are not consistent with the demographics of the assessment area. SNB's refinance originations of 3% to low- income and 13% to moderate- income borrowers are less than the percent of low- and moderate- income borrowers in the assessment area, 19% and 18%, respectively. *See Table 9 on page 40 for detail.*

Market Share - HMDA Borrowers

The bank's market shares of HMDA loans to borrowers are reasonable. The bank's HMDA market shares for loans to low- and moderate- income families are lower than its overall HMDA market shares. However, the bank ranks among the top 15 lenders in originating home purchase and home- improvement loans to low- and moderate- income families. This is reasonable considering there are from 39 to 97 lenders in the assessment area. The bank ranks in the top 35 lenders in originating refinance loans to low- and moderate- income families. This is reasonable considering there are up to 113 refinance lenders in the assessment area. SNB is a \$1.4 billion bank; banks that ranked above

SNB have assets ranging from \$642 million to \$73 billion. *See Tables 7 - 9 on pages 38 - 40 for detail.*

Small Business Loans

SNB's small business loans of varying sizes are reasonable. The bank originated 49% of its small business loans in amounts less than \$250 thousand. This represents reasonable responsiveness to small dollar loan needs of local businesses. The bank is not primarily a small business lender. *See Table 10 on page 41 for detail.*

Motor Vehicle Loans

SNB's distribution of motor vehicle loans is adequate. SNB's distribution of 8% of its motor vehicle loans to low- income borrowers is less than the 15% of low- income households in the assessment area. The bank's origination of 13% of its motor vehicle loans to moderate- income borrowers is less than the 21% of moderate- income households in the assessment area. The bank's performance is not uncommon given the high level of competition for this type of loan in the assessment area. *See Table 14 on page 45 for detail.*

Community Development Lending

SNB has an adequate level of community development loans in this assessment area given its size and capacity, and the high level of competition from other financial institutions. SNB has made some community development loans in response to identified credit needs. SNB has taken some opportunities to make loans to entities involved in providing affordable housing as this need was identified as a strong credit need by community groups. During the review period, SNB made 11 loans totaling \$2.2 million. This includes \$1.4 million in commitments. *See Table 1 on page 32 for detail.*

Examples include:

SNB originated a \$215,000 loan to a local developer. This loan was to purchase a 28-unit apartment complex targeted for Section 8 low- income residents in Windham, Ohio.

SNB originated two \$100,000 loans for operating expenses to two community development organizations. These programs focus on economic development by assisting in the financing of small businesses and attempting to develop opportunity for more blue collar jobs for low- and moderate-income individuals.

The bank has three community development commitments in 1999 for affordable housing. Two of the loan commitments will provide a portion of the \$4.5 million permanent financing of the projects. These two projects are located in Warren and in Youngstown, Ohio. Each project consists of 40 single-family low-income housing units. The other project for \$125 thousand to finance single and multi-family homes

targeted for rent to low- and moderate- income families.

INVESTMENT TEST

SNB has an adequate level of qualified investments in this assessment area primarily based upon the state-wide tax credit mentioned earlier in the public evaluation. Qualified investments consist of donations to local community organizations that serve to meet the needs of low- and moderate- income individuals and geographies. The bank did not participate in opportunities to invest in local low- income housing tax credits that were available in Youngstown and Warren, Ohio. *See Table 12 on page 43 for detail.*

SERVICE TEST

The bank's service activity in this AA is considered reasonable. The bank has 15 branches in Trumbull and Mahoning Counties. However, the bank has no branch located in a low-income geography. There are 15 low- income geographies in this assesment area. SNB has a loan production office that exists primarily to help meet credit needs of low- and moderate- income families. The bank's representation in moderate- income geographies is good. The bank's 20% of branches in moderate- income geographies is favorable to the 13% population in moderate- income geographies in the assessment area. *See Table 13 on page 44 for detail.*

Alternative Delivery Systems

Alternative delivery systems are reasonable. Along with SNB's alternative delivery systems discussed earlier, the bank has specialized systems to specifically meet the credit needs of low- and moderate-income families. These systems include two loan originators in the Youngstown and Warren areas. In Warren this service is through the loan production office in a moderate- income geography. The originators were specifically designated to stimulate home mortgage loans, including FHA and VA loans, in low- and moderate- income areas and to low- and moderate- income individuals. The originators meet with low- and moderate- income individuals at local realtors, grocery stores, and borrower's homes.

SNB has 14% of its ATMs in moderate- income geographies in this assessment area. This is reasonable in relation to the 13% population in moderate- income geographies in the assessment area.

Community Development Services

The bank has an adequate level of community development services in this assessment area. Most of the bank's community development services were in Trumbull County. The bank's activities in Mahoning County were limited.

The bank sponsored two annual home- buyers seminars to inform the community on how to obtain loan

financing and the basics of home ownership.

The bank provided technical assistance at housing and financial seminars at the Youngstown Area Urban League and the Rebecca Williams Community Center.

At least eight officers serve in an official capacity on the board or committees of:

- The Rebecca Williams Community Center, a center that provides many social services, including day care, to low- and moderate- income individuals;
- The United Way, an entity that provides monies to health and service agencies that provide services to low- and moderate- income individuals.
- The Reinvestment Partnership Corporation, a consortium that provides technical assistance and financing to small businesses; and
- The City of Warren Community Development Department, a department that focuses on low- and moderate- income housing needs, brownfields cleanup, and the creation of jobs, including those for low- and moderate- income individuals.

Conclusions with Respect to Performance Tests in the Akron MSA (0080)

This area includes 154 census tracts or 50% of SNB low- income geographies and 42% of its moderate- income geographies. SNB's performance in this MSA was weighed secondary to that of the Youngstown-Warren MSA. The bank has a very low presence in this assessment area and competition is very high. SNB has 32% of its branches and 13% of its deposits in this area.

Lending Test

The bank made 705 HMDA loans totaling \$65 million in this assessment area (MSA 0080) that represents 20% of the total number and 25% of the total dollar of all the bank's HMDA loans. The bank ranks as the 28th largest HMDA lender with a 1% market share in this assessment area. The bank's 268 small business loans totaling \$39 million made in this assessment area represent 26% of the total number and 30% of the total dollar of all the bank's small business loans. The bank ranks as the 14th largest small business lender with a 2% market share. Seven percent of the bank's small farms loans (one) and 7% of the total small farm loan dollars (\$84 thousand) were made in this assessment area. The bank ranks as the 9th largest small farm lender with a 2% market share. Primarily competitors with higher ranking have assets in excess of \$1 billion.

Geographic Distribution

SNB's overall geographic distribution is adequate. However, it's distribution for all HMDA loans in moderate- income tracts are fair. SNB's distribution of small business is adequate. The bank's distribution of motor vehicle loans is adequate.

HMDA Loans

The bank's geographic distribution of all its HMDA loans is considered adequate. SNB's HMDA distribution in low- and moderate- income geographies is fairly consistent with the demographics of the assessment area. However, the bank's percent of home purchase loans in moderate- income geographies is fair. SNB is among many competitors in this MSA, primarily in the City of Akron. The distribution of owner-occupied units is as follows: low- income 3%, moderate- income 13%, middle-income 56%, and upper- income 28%.

SNB's home purchase originations are adequate. SNB originated 2% of its home purchase loans in low- income geographies that is consistent with the 3% of owner- occupied units in low income geographies. The bank's origination of 4% of its home purchase loans in moderate- income geographies is fairly consistent with the 13% of owner- occupied units in moderate- income geographies. *See Table 2 on page 33 for detail.*

SNB's home- improvement originations are adequate. SNB originated 2% of its home-improvement loans in low- income that is consistent with the 3% of owner- occupied units in low- income geographies. The bank's origination of 7% of its home- improvement loans in moderate- income geographies is fairly consistent with the 13% of owner- occupied units in moderate- income geographies. *See Table 3 on page 34 for detail.*

SNB's refinance originations in low- and moderate- income geographies are adequate. SNB originated 1% of its refinance loans in low- income geographies that is less than the 3% of owner- occupied units in low- income geographies. The bank's origination of 8% of its refinance loans in moderate- income geographies is fairly consistent with the 13% of owner- occupied units in moderate- income geographies. *See Table 4 on page 35 for detail.*

The bank made HMDA loans in 81% of its geographies in this assessment area. However, there are gaps in the bank's distribution of HMDA loans in low- income geographies. The bank made loans in 40% of the low- income geographies. There are 20 low- income tracts in the assessment area. The bank's lending in low- income geographies is reasonable in light of the demographics of the area. The City of Akron (Summit County) comprises all of the bank's low- income geographies in this assessment area. The low- income areas are located in downtown Akron and adjacent areas that include a university and a significant percent of low- owner occupied units. Due to its limited branch network and high competition, the bank is not a major lender in this portion of the assessment area. There were no gaps in the bank's lending in moderate- income geographies.

Market Share - HMDA Geographies

The bank is not a major lender in this assessment area. SNB is the 29th largest lender for home purchase loans. The bank's market ranks extended to the 40th to the 43rd largest lender for home-

improvement and refinance loans in this assessment area. SNB's overall market share for home purchase, home-improvement, or refinance is 1% or less. The bank's market shares for low- and moderate- income borrowers is similar to its overall HMDA market shares. Compared to the bank's \$1.4 billion in assets, many of the financial institutions have assets ranging from \$1 billion to \$73 billion. *See Tables 2 - 4 on pages 33 - 35 for detail.*

Small Business Loans

SNB's distribution of small business originations is adequate.

SNB originated 7% of its small business loans in low- income geographies that is similar to the 7% of businesses in the area. The bank's 11% of small business originations in moderate- income geographies is fairly consistent with the 14% of businesses located in those geographies.

See Table 5 on page 36 for detail.

Market Share - Small Business Loans - Geographies

SNB's small business market share is reasonable. The bank's small business market shares in low-income (1%) and moderate- income (2%) geographies is similar to the overall small business market share of 2%. The bank ranks as the 14th largest small business lender out of 81 lenders in this assessment area. Primarily higher market shares were held by lenders with assets significantly in excess of the bank's \$1.4 billion.

SNB's origination of small business loans did show lending gaps. SNB made small business loans in 44% of the geographies in the assessment area. However, the bank made small business loans in 35% of the low- income geographies and 32% of the moderate- income geographies.

This performance is reasonable in light of the bank's limited presence in this assessment area.

Motor Vehicle Loans

SNB's distribution of motor vehicle loans is adequate. SNB's distribution of 2% of its motor vehicle loans in low- income geographies is less than the 5% of population in low- income geographies. The bank's origination of 6% of its motor vehicle loans in moderate- income geographies is less than the 15% of population in moderate- income geographies in the assessment area. *See Table 14 on page 45 for detail.*

The bank loaned in 91% of its geographies in this assessment area. However, the bank made loans in 50% of the low- income geographies in this assessment area. The bank's small business originations are reasonable given the fact that the bank has a low presence in this assessment area and a high level of competition exists.

Borrower Characteristics

The distribution of loans to borrowers was based on the bank's originations of HMDA reportable loans to borrowers of varying incomes as compared to the percent of families, by income levels, living in the assessment area. Small business loans were analyzed by reviewing loan amounts of varying sizes. The bank's distribution of motor vehicle loans was compared to the percent of households, by income level, within the assessment area.

SNB's overall distribution of HMDA loans is adequate. The bank's small business loan amounts of varying sizes is reasonable. The bank's distribution of motor vehicle loans is adequate.

HMDA Loans

SNB's distribution of home purchase and home-improvement loans to borrowers of varying incomes is adequate. However, the bank's distribution of home purchase loans to low-income borrowers is fair. At least 59% of the low-income borrowers reside in low-income areas. The demographics of this assessment area include high poverty levels that hinder making loans to low-income borrowers. The bank's loans to moderate-income borrowers are consistent with the demographics of the assessment area, except for refinance loans. The bank has adequate market shares for its home purchase and home-improvement loans. These types of loans are major credit needs that were identified by community groups. The percent of families are as follows: low-income is 18%, moderate-income is 18%, middle-income is 24%, and upper-income is 40%.

SNB's home purchase originations are adequate. SNB's home purchase originations of 6% to low-income borrowers are less than the 18% of low-income borrowers in the assessment area. However, the bank's home purchase originations of 16% to moderate-income borrowers are close to the 18% of moderate-income families in the assessment area. *See Table 7 on page 38 for detail.*

SNB's home-improvement originations are adequate. SNB's home-improvement originations of 11% to low-income borrowers are fairly consistent with the 18% of low-income borrowers. The bank's home-improvement originations of 18% to moderate-income borrowers match the percent of moderate-income families in the assessment area. *See Table 8 on page 39 for details.*

SNB's refinance originations are fair. SNB's refinance originations of 6% to low-income and 11% to moderate-income borrowers is less than the percent of low- and moderate-income families in the assessment area, 18% respectively. *See Table 9 on page 40 for detail.*

Market Share - HMDA Borrowers

SNB is not a significant lender in the Akron MSA. Market reports show SNB is the 29th largest lender of home purchase loans and the 42nd and the 43rd largest lender of home-improvement and refinance loans, respectively, in this assessment area. SNB's overall market shares for home purchase, home-

improvement, or refinance is 1% or less. The bank's market shares for loans to low- and moderate-income borrowers are similar to the bank's overall HMDA market shares. Compared to the bank's \$1.4 billion in assets, many of the financial institutions have assets ranging from \$1 billion to \$73 billion. *See Tables 7 - 9 on pages 38 - 40 for detail.*

Small Business Loans

SNB's small business loans of varying amounts are reasonable. The bank originated 41% of its small business loans in amounts less than \$250 thousand. This represents reasonable responsiveness to small dollar loan needs of local businesses. *See Table 10 on page 41 for detail.*

Motor Vehicle Loans

SNB's distribution of motor vehicle loans is adequate. SNB's distribution of 16% of its motor vehicle loans to low- income borrowers is greater than the 14% of low- income households in the assessment area. The bank's distribution of 22% of its motor vehicle loans to moderate- income borrowers is fairly consistent with the 26% of moderate- income households in the assessment area. The bank's performance is not uncommon given the high level of competition in the assessment area. *See Table 14 on page 45 for detail.*

Community Development Lending

SNB has limited community development loans in this assessment area. SNB made one loan totaling \$300,000 to a nonprofit that provides community development services to low- and moderate- income families. Various other community development opportunities exist in the area. However, SNB's ability to lend in this assessment area is affected by its limited branch network and strong competition in the area.

INVESTMENT TEST

SNB has adequate investments in this assessment area. The primary investment is with the Ohio Capital Corporation for Housing Limited Partnership VIII, a low- income housing tax credit. SNB invested \$1 million that will be used towards one of the partnership's projects to construct and develop single-family homes for low- income families in Portage County. Other investments consist of two donations to community development service organizations that serve low- and moderate- income families. Additional opportunities for qualified investments do exist given that various community development groups are located in this assessment area. *See Table 12 on page 43 for detail.*

SERVICE TEST

The bank's service activity in this AA is reasonable considering the bank's high level of branches in moderate- income geographies. The bank has 12 branches in Summit and Portage Counties. However, the bank has no branch in low-income tracts. There are 20 low- income geographies in this assessment area. The bank's presence in moderate- income tracts is good. The bank's 17% of branches in moderate- income geographies compares favorably to the 15% population in moderate- income geographies in the assessment area. *See Table 13 on page 44 for detail.*

Alternative Delivery Systems

SNB's alternative delivery systems are consistent throughout the assessment areas as discussed earlier in this public evaluation. In this assessment area SNB has 17% of its ATMs in this assessment area in moderate- income geographies. This is favorable to the 15% of population in moderate- income geographies in the assessment area.

Community Development Services

SNB's community development services in this assessment area are limited. The bank had little community development services. The bank did participate in the City of Akron Fair Housing Contact Service First Time Homebuyer Seminar on two occasions.

Conclusion With Respect For Performance Tests Cleveland-Elyria-Lorain Metropolitan Area (1680)

This area includes 35 census tracts or 2% of SNB low- income geographies and 17% of its moderate- income geographies. SNB's performance in this MSA is weighed secondary to that of the Youngstown-Warren MSA. SNB has 18% of its branches and 13% of its deposits in this area.

LENDING TEST

The bank made 378 HMDA loans totaling \$24 million in this assessment area (MSA 1680) that represents 11% of the total number and 10% of the total dollar of all the bank's HMDA loans. The bank ranks as the 9th largest HMDA lender with a 3% market share. The bank's 105 small business loans totaling \$14 million made in this assessment area represent 10% of the total number and 11% of the total dollar of all the bank's small business loans. The bank ranks as the 22nd largest small business lender with a 1% market share. Forty seven percent of the bank's small farms loans (seven) totaling \$413 thousand (34%) were made in this assessment area. The bank ranks as the fourth largest small farm lender with a 7% market share in this assessment area. Primarily lenders with higher rank have assets in excess of the bank's \$1.4 billion.

Geographic Distribution

SNB's overall geographic distribution of HMDA loans is adequate. SNB's geographic distribution of small business loans and motor vehicle loans is good.

HMDA Loans

SNB's overall HMDA originations in low- income geographies, except for home- improvement loans, are fairly consistent with the demographics of the assessment area. It is important to note that there is only one low- income geography in this assessment area. However, the bank's home- improvement loan originations in moderate- income geographies is good and are fairly consistent with the demographics of the area. The bank's market performance is reasonable, especially for home purchase and home- improvement loans. The distribution of owner-occupied units is as follows: low- income is 2%, moderate- income is 31%, middle- income is 42%, and upper- income is 25%.

SNB's home purchase originations are adequate. SNB originated 1% of its home purchase loans in low- income geographies that is fairly consistent with the 2% of owner- occupied units in low-

income geographies. The bank's origination of 21% of its home purchase loans in moderate- income geographies is fairly consistent with the 31% of moderate- income geographies in the assessment area. *See Table 2 on page 33 for detail.*

SNB's home- improvement originations are adequate. SNB originated no home-improvement loans in low- income geographies. The bank's 41% of its home- improvement originations in moderate- income geographies exceed the 31% of owner- occupied units in moderate- income geographies in the assessment area. *See Table 3 on page 34 for detail.*

SNB's refinance originations are adequate. SNB originated 1% of its refinance loans in low- income geographies that is fairly consistent with the 2% of owner- occupied units in low- income geographies. The bank's 28% of its refinance originations in the moderate- income geographies is fairly consistent with the 31% of owner- occupied units in moderate- income geographies in the assessment area. *See Table 4 on page 35 for detail.*

HMDA Market Share - Geographies

Market Share is reasonable. SNB's ranks among the top ten lenders in the assessment area for home purchase and home improvement loans. The bank has no HMDA market share in low- income geographies because the bank did not originate loans in those geographies during 1997. The bank's overall home purchase market share and home purchase moderate- income market shares are similar, around 3%. The bank's overall home- improvement market share of 6% exceeds the bank's moderate- income- home- improvement market share of 2%. SNB ranks as the 17th largest lender of refinance loans. The bank's refinance market share in moderate- income geographies (1%) is less than the bank's

overall refinance market share. *See Tables 2 - 4 on pages 33 - 35 for detail.*

There are no conspicuous gaps in the bank's HMDA lending in this assessment area.

Small Business Loans

SNB's distribution of small business originations is good. SNB originated 7% of its small business loans in low- income geographies that is greater than the 2% of businesses in the area. The bank's small business originations in moderate- income geographies (30%) were close to the 31% of businesses located in those geographies. SNB is not primarily a small business lender but has done well in this area. *See Table 5 on page 36 for detail.*

Market Share Small Business - Geographies

SNB's small business market share is reasonable. The bank's overall small business market share and its market share in low- income and moderate- income geographies are the same at 1%. The bank ranks as the 22nd largest small business lender out of 112 lenders in this assessment area. Primarily higher market shares were held by lenders with assets significantly in excess of the bank's \$1.4 billion.

There are no conspicuous gaps in the bank's small business lending in this assessment area.

Motor Vehicle Loans

SNB's distribution of motor vehicles is good. SNB's distribution of 4% of its motor vehicle loans in low- income geographies is consistent with the 3% of population in low- income geographies. The bank's origination of 39% of its motor vehicle loans in moderate- income geographies is consistent with the 35% of population in moderate- income geographies in the assessment area. The bank is adequately meeting the competition in this assessment area. *See Table 14 on page 45 for detail.*

There are no conspicuous gaps in the bank's motor vehicle lending in this assessment area.

Borrower Characteristics

The distribution of loans to borrowers was based on the bank's originations of HMDA reportable loans to borrowers of varying incomes as compared to the percent of families, by income levels, living in the assessment area. Small business loans were analyzed by reviewing loan amounts of varying sizes. The bank's distribution of motor vehicle loans was compared to the percent of households, by income levels, within the assessment area.

SNB's distribution of HMDA loans to borrowers of varying incomes is adequate. The bank's performance is consistent or similar with the demographics of the assessment area, except for loans to

low- income borrowers. The bank's distribution of small business lending is reasonable. The bank's distribution of motor vehicle lending is adequate.

HMDA Loans

SNB's distribution of HMDA loans for home purchase, home- improvement, and refinance loans is adequate. The bank's percent of loans to low- income borrowers are less than the percent of low- income families in the assessment area. However, the bank's percent of loans to moderate- income borrowers are greater than the percent of moderate- income families. The bank's market performance is reasonable. The percent of families are as follows: low- income is 23%, moderate- income is 20%, middle- income is 24%, and upper- income is 33%.

SNB's home purchase originations are adequate. SNB's home purchase originations of 13% to low- income borrowers are less than the 23% of low- income families in the assessment area. However, the bank's 22% of home purchase originations to moderate- income borrowers is greater than the 20% of moderate- income families in the assessment area. *See Table 7 on page 38 for detail.*

SNB's home- improvement originations are adequate. SNB's home- improvement originations of 11% to low- income borrowers are less than the 23% of low- income families in the assessment area. The bank's 37% of home- improvement loans to moderate- income borrowers exceed the 20% of moderate- income families in the assessment area. *See Table 8 on page 39 for detail.*

SNB's refinance originations are adequate. SNB's refinance originations of 15% to low- income borrowers are less than the 23% of low- income families in the assessment area. However, the bank's origination of 26% of its refinance loans to moderate- income borrowers is greater than the 20% of moderate- income families in the assessment area. *See Table 9 on page 40 for detail.*

HMDA Market Share

Market share is reasonable. SNB is among the top ten lenders in the assessment area of home purchase and home- improvement loans. SNB's overall market share for home purchase and home- improvement loans ranges from 3% to 6%. The bank's home purchase and home- improvement market shares for low- income borrowers are lower than their overall market shares. The bank's home purchase and home- improvement market shares for moderate- income borrowers exceed those overall market shares. SNB is the 17th largest refinance lender in the assessment area with a 2% market share. The bank's refinance market share to low- income borrowers is good and exceeds the bank's overall refinance market share. The bank's refinance market share to moderate- income borrowers is less than the bank's overall refinance market share. Compared to the bank's \$1.4 billion in assets, many of the financial institutions have assets ranging from \$1 billion to \$73 billion. *See Tables 7 - 9 on pages 38 - 40 for detail.*

Small Business Lending

SNB's small business loans of varying amounts are reasonable. The bank originated 48% of its small business loans in amounts less than \$250 thousand. This represents reasonable responsiveness to small dollar loan needs of local businesses. *See Table 10 on page 41 for detail.*

Motor Vehicle Lending

SNB's distribution of motor vehicle lending is adequate. The bank's distribution of 20% of its motor vehicle loans to low- income borrowers is good and exceeds the 7% of low- income households in the assessment area. However, the bank's distribution of 28% of its motor vehicles to moderate- income borrowers was less than the 49% of moderate- income households in the assessment area. *See Table 14 on page 45 for detail.*

Community Development Lending

SNB reported no community development loans in this assessment area. The bank made one loan for \$40 thousand outside of its assessment area in the Cleveland-Elyria-Lorain MSA.

INVESTMENT TEST

SNB has limited investments in this assessment area. Qualified investments included two donations to a community development company that serves low- and moderate- income families. Additional opportunity for qualified investments exists with other community service organizations formed to meet needs of low- and moderate- income persons in the assessment area. *See Table 12 on page 43 for detail.*

SERVICE TEST

The bank's service activity in this AA is considered reasonable. The bank has six branches in Medina, Cuyahoga, and Ashtabula Counties. The bank has no branch in its one low- income geography. However, the bank's presence in moderate- income geographies (33%) is close to the 35% of moderate- income population in the assessment area. In Ashtabula, the largest portion of this assessment area, the bank has the fourth highest number of branches of the federally insured banks in

the area. Three of the four other banks with a higher number of branches are significantly larger banks such as Keybank, N.A. and Star Bank, N.A. *See Table 13 on page 44 for detail.*

Alternative Delivery Systems

SNB's alternative delivery systems are consistent throughout the assessment area as discussed earlier in this public evaluation. In this assessment area SNB has 40% of its ATMs in this assessment area in moderate- income geographies. This compares favorably to the 35% of population in moderate- income geographies in the assessment area.

Community Development Services

The bank had little community development services in this assessment area. The bank provided financial expertise at three housing seminars. Seminars were held with housing agencies that seek home purchase and affordable housing for low- and moderate- income families.

Conclusion With Respect For Performance Tests for Steubenville - Wierton, OH-WV (MSA 8080)

In this assessment area SNB's branches and deposits each represent less than 10% of the bank's total branches and less than 10% of the bank's total deposits.

The bank's lending performance in this assessment area (MSA 8080) is inconsistent with the Low Satisfactory overall Lending Test rating. The bank's performance is weaker than the bank's overall Lending Test performance. In geographies, the bank had no home- improvement loans in low- and moderate- income areas. For borrowers, the bank had no home purchase or home- improvement loans to moderate- income borrowers.

The bank's lending performance in this assessment area did not affect the overall Lending Test rating due to the bank's limited branch, deposit, and loan presence in this assessment area. Due to the entering this AA through a recent acquisition, the bank had limited time to perform and virtually no control over activities in this assessment area during this review period.

The bank's investment performance in this assessment area is not inconsistent with the overall Low Satisfactory Investment Test rating.

The bank's service performance in this assessment area is not inconsistent with the overall Low Satisfactory Service Test rating.

APPENDIX

Definition of Terms

The following are definitions of terms used throughout this public evaluation. The definitions are not the strict legal definitions contained in 12 C.F.R. 25.12, but rather a more concise synopsis of their meaning.

Community Development - A loan, investment, or service for (1) affordable housing for low- or moderate-income individuals; (2) community services targeted to low- or moderate- income individuals; (3) activities that promote economic development by financing small businesses and farms; and (4) activities that revitalize or stabilize low- or moderate- income areas.

Consumer Loan - A loan to one or more individuals for household, family, or other personal expenditures.

HMDA Loan - A residential real estate loan (home purchase, home refinance, home improvement, or multifamily).

Geography - A census tract (CT) or block numbering area (BNA).

Low-, Moderate-, Middle-, and Upper-Income Area - A low-income area is one in which the median family income is less than 50% of the area median income, moderate-income is 50% to 79% of the area median family income, middle-income is 80% to 119% of the area median family income, and upper-income is 120% or more of the area median family income.

Low-, Moderate-, Middle-, and Upper-Income Individuals - A low-income individual is an individual whose income is less than 50% of the area median income, moderate-income is 50% to 79% of the area median family income, middle-income is 80% to 119% of the area median family income, and upper-income is 120% or more of the area median family income.

Qualified Investment - A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Tier 1 Capital - It includes a bank's common stockholder's equity; noncumulative perpetual preferred stock; and minority interest in the equity accounts of any consolidated subsidiaries.

Content of Standardized Tables

The following is a listing and brief description of each table included in the set of standardized 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 MSA/AA.

Table 2. - Geographic Distribution of Home Purchase Loan Originations - 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 rank and market share information based on the most recent aggregate market data available.

Table 3. - Geographic Distribution of Home Improvement Loan Originations - See Table 2.

Table 4. - Geographic Distribution of Home Mortgage Refinance Loan Originations - See Table 2.

Table 5. - Geographic Distribution of Small Business Loan Originations - The percentage distribution of the number of small loans (<\$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 rank and market share information based on the most recent aggregate market data available.

Table 6. - Geographic Distribution of Small Farm Loan Originations - The percentage distribution of the number of small loans (<\$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 rank and market share information based on the most recent aggregate market data available.

Table 7. - Borrower Distribution of Home Purchase Loan Originations - 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 MSA/AA. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 8. - Borrower Distribution of Home Improvement Loan Originations - See Table 7.

Table 9. - Borrower Distribution of Home Mortgage Refinance Loan Originations - See Table 7.

Table 10. - Borrower Distribution of Small Business Loan Originations - Compares the percentage distribution of the number of small loans (<\$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. The table also 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 11. - Borrower Distribution of Small Farm Loan Originations - Compares the percentage distribution of the number of small loans (<\$500 thousand) 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. The table also 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 12. - Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period.

Table 13. - Distribution of Branch and ATM Delivery System - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 14. - Geographic and Borrower Distribution of Consumer Loan Originations - For geographic distribution, the table 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 the population within each geography. For borrower distribution, the table 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 of households by income level in each MSA/AA.

Table 1. Lending Volume

LENDING VOLUME		State: OHIO				Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998						
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope:												
MSA 9320/YOUNGSTOWN-WARREN	65%	2,388	165,442	650	75,009	7	703	11	2,160	3,056	243,314	67%
MSA 0080/AKRON	13%	705	64,874	268	39,010	1	84	1	300	975	104,268	21%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	13%	378	24,480	105	13,610	7	413	0	0	490	38,503	11%
Limited-Scope:												
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	9%	68	3,700	0	0	0	0	0	0	68	3,700	1%

Youngstown MSA - HMDA - includes 2 multi-family loans.

Akron MSA - HMDA - includes 1 multi-family loan.

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE		State: OHIO						Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
MSA 9320/YOUNGSTOWN-WARREN	4%	<1%	11%	4%	52%	41%	33%	55%	6	5%	3%	3%	4%	7%	985	67%
MSA 0080/AKRON	3%	2%	13%	4%	56%	65%	28%	29%	29	1%	2%	<1%	1%	1%	288	20%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	2%	1%	31%	21%	42%	71%	25%	7%	9	3%	0%	2%	6%	0%	158	11%
Limited-Scope:																
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	3%	4%	9%	10%	77%	55%	11%	31%	NA	NA	NA	NA	NA	NA	29	2%

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT																
State: OHIO																
Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
MSA 9320/YOUNGSTOWN-WARREN	4%	3%	11%	11%	52%	39%	33%	47%	8	3%	3%	3%	2%	4%	242	54%
MSA 0080/AKRON	3%	2%	13%	7%	56%	73%	28%	18%	42	1%	0%	<1%	2%	2%	120	27%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	2%	0%	31%	41%	42%	59%	25%	0%	5	6%	0%	2%	8%	0%	86	19%
Limited-Scope:																
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	3%	0%	9%	0%	77%	100%	11%	0%	NA	NA	NA	NA	NA	NA	2	0%

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE				State: OHIO				Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998									
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans		
	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total	
Full-Scope:																	
MSA 9320/YOUNGSTOWN-WARREN	4%	1%	11%	4%	52%	38%	33%	57%	9	3%	2%	2%	2%	4%	1,159	71%	
MSA 080/AKRON	3%	1%	13%	8%	56%	70%	28%	21%	43	1%	<1%	<1%	1%	1%	296	18%	
MSA 1680/CLEVELAND-ELYRIA-LORAIN	2%	1%	31%	28%	42%	61%	25%	10%	17	2%	0%	1%	3%	0%	134	8%	
Limited-Scope:																	
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	3%	0%	9%	8%	77%	57%	11%	35%	NA	NA	NA	NA	NA	NA	37	3%	

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS		State: OHIO				Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998										
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank *	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overa ll	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
MSA9320/YOUNGSTOWN-WARREN	8%	6%	13%	8%	43%	41%	36%	45%	5	8%	7%	6%	7%	11%	650	64%
MSA 0080/AKRON	7%	7%	14%	11%	48%	61%	31%	21%	14	2%	1%	2%	2%	1%	268	26%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	2%	7%	31%	30%	30%	45%	37%	18%	22	1%	1%	1%	1%	<1%	105	10%
Limited-Scope:																
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	23%	0%	5%	0%	48%	0%	24%	NA	NA	NA	NA	NA	NA	NA	0	0%

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM		State: OHIO						Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
MSA 9320/YOUNGSTOWN-WARREN	2%	0%	7%	0%	53%	0%	38%	100%	4	9%	0%	0%	0%	46%	7	47%
MSA 0080/AKRON	1%	0%	7%	0%	58%	100%	34%	0%	9	2%	0%	0%	2%	0%	1	6%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	1%	0%	28%	0%	51%	100%	20%	0%	4	7%	0%	0%	10%	0%	7	47%
Limited-Scope:																
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	8%	0%	11%	0%	70%	0%	11%	0%	NA	NA	NA	NA	NA	NA	0	0%

(*) Based on 1997 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HMDA HOME PURCHASE				State: OHIO				Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998								
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
MSA 9320/YOUNGSTOWN-WARREN	19%	6%	18%	20%	22%	25%	41%	49%	6	5%	3%	5%	4%	7%	985	67%
MSA 0080/AKRON	18%	6%	18%	16%	24%	21%	40%	57%	29	1%	1%	1%	1%	1%	288	20%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	23%	13%	20%	22%	24%	27%	33%	38%	9	3%	0%	4%	3%	2%	158	11%
Limited-Scope:																
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	23%	7%	18%	0%	22%	31%	37%	62%	NA	NA	NA	NA	NA	NA	29	2%

(*) As a percentage of loans with borrower income information available.

(**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT		State: OHIO						Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998								
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
MSA 9320/YOUNGSTOWN-WARREN	19%	10%	18%	17%	22%	26%	41%	45%	8	3%	2%	2%	3%	4%	242	54%
MSA 0080/AKRON	18%	11%	18%	18%	24%	31%	40%	39%	42	1%	2%	<1%	2%	1%	120	27%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	23%	11%	20%	37%	24%	30%	33%	17%	5	6%	2%	9%	6%	5%	86	19%
Limited-Scope:																
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	23%	50%	18%	0%	22%	50%	37%	0%	NA	NA	NA	NA	NA	NA	2	0%

(*) As a percentage of loans with borrower income information available. No financial information was available on loans originated by the bank in the following MSAs:

Youngstown MSA - 2%

Akron MSA - 1%

Cleveland MSA - 5%

(**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE				State: OHIO				Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998								
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overa ll	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
MSA 9320/YOUNGSTOWN-WARREN	19%	3%	18%	13%	22%	24%	41%	57%	9	3%	1%	2%	3%	4%	1,159	71%
MSA 0080/AKRON	18%	6%	18%	11%	24%	26%	40%	57%	43	1%	1%	<1%	<1%	1%	296	18%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	23%	15%	20%	26%	24%	20%	33%	37%	17	2%	3%	1%	1%	2%	134	8%
Limited-Scope:																
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	23%	0%	18%	14%	22%	32%	37%	54%	NA	NA	NA	NA	NA	NA	37	2%

(*) As a percentage of loans with borrower income information available. No financial information was available on loans originated by the bank in the following MSAs:
 Youngstown MSA - 3%
 Cleveland MSA - 2%

(**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS			State: OHIO		Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998						
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses *	% BANK Loans**	% Market Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
MSA 9320/YOUNGSTOWN-WARREN	74%	41%	59%	26%	23%	51%	8%	5%	650	64%	95
MSA 0080/AKRON	74%	43%	49%	24%	17%	59%	2%	2%	268	26%	117
MSA 1680/CLEVELAND-ELYRIA-LORAIN	69%	52%	48%	26%	22%	52%	1%	1%	105	10%	108
Limited-Scope:											
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	72%	NA	53%	0	0	0	NA	NA	0	0%	0

(*) As a percentage of businesses with known revenues.

(**) As a percentage of loans with revenue information available.

(***) The market consists of all other Small Business reporters in bank's assessment area and is based on 1997 Aggregate Small Business Data only.

(****) Based on 1997 Aggregate Small Business Data only.

Note: The bank's revenue information on small business loans was unreliable.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM			State: OHIO			Valuation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998					
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
MSA 9320/YOUNGSTOWN-WARREN	93%	57%	88%	298	150	255	9%	5%	7	97%	75
MSA 0080/AKRON	92%	100%	92%	84	0	0	4%	5%	1	6%	84
MSA 1680/CLEVELAND-ELYRIA-LORAIN	93%	71%	82%	131	282	0	7%	6%	7	47%	56
Limited-Scope:											
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	96%	NA	88%	0	0	0	NA	NA	0	0%	NA

(*) As a percentage of farms with known revenues.

(**) As a percentage of loans with revenue information available.

(***) The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1997 Aggregate Small Farm Data only.

(****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
State: OHIO				Evaluation Period: JANUARY 1, 1997 TO JUNE 7, 1999					
MSA/Assessment Area:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Ohio State-wide	1	761	100%	1	1,000	93%	1	1,761	95%
MSA 9320/YOUNGSTOWN-WARREN	0	0	0%	10	52	5%	10	52	3%
MSA 0080/AKRON	0	0	0%	2	15	1%	2	15	1%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	0	0	0%	2	15	1%	2	15	1%
Limited-Scope:									
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	0	0	0%	0	0	0%	0	0	0%

(*) Prior Period Investments means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				State: OHIO				Evaluation Period: JANUARY 1, 1997 to JUNE 7, 1999									
MSA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
MSA 9320/YOUNGSTOWN-WARREN	65%	15	44%	0%	20%	33%	47%	14	45%	0%	14%	36%	50%	6%	13%	50%	31%
MSA 0080/AKRON	13%	12	34%	0%	17%	50%	33%	12	35%	0%	17%	50%	33%	5%	15%	54%	26%
MSA 1680/CLEVELAND-ELYRIA-LORAIN	13%	6	18%	0%	33%	33%	34%	5	16%	0%	40%	20%	40%	3%	35%	39%	23%
Limited-Scope:																	
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	9%	2	6%	50%	0%	0%	50%	1	3%	0%	0%	0%	100%	7%	9%	73%	11%

Table 14. Geographic and Borrower Distribution of Consumer Loan Originations (Optional)

Geographic and Borrower Distribution: CONSUMER LOANS																		State: OHIO		Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998	
MSA /Assessment Area	Geographic Distribution								Borrower Distribution								Total Consumer Loans				
	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		#	% of Total			
	% of Pop*	% Bank Loans	% of Pop*	% Bank Loans	% of Pop*	% Bank Loans	% of Pop*	% Bank Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans					
Full Scope:																					
MSA 9320/YOUNGSTOWN-WARREN	6%	1%	13%	9%	50%	48%	31%	42%	15%	8%	21%	13%	47%	18%	17%	21%	3152	41%			
MSA 0080/AKRON	5%	2%	15%	6%	54%	69%	26%	23%	14%	16%	26%	22%	50%	28%	10%	29%	1351	18%			
MSA 1680/CLEVELAND-ELYRIA-LORAIN	3%	4%	35%	39%	39%	54%	23%	3%	7%	20%	49%	28%	37%	28%	7%	19%	774	10%			
Limited Scope:																					
MSA 8080/STEUBENVILLE-WIERTON, OH-WV	7%	6%	9%	0%	73%	76%	11%	18%	19%	12%	10%	0%	63%	6%	8%	0%	17	0%			

(*) The percentage of the population in the MSA/Assessment area that resides in these geographies.

No financial information on borrowers was available for:

- Youngstown-Warren MSA - 40%.
- Akron MSA - 5%
- Cleveland MSA - 5%
- Steubenville-Wierton MSA - 82%