



PUBLIC DISCLOSURE

February 03, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Park National Bank
Charter Number 9179

50 North Third Street
Newark, OH 43058

Office of the Comptroller of the Currency

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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

The following table indicates the performance level of The Park National Bank (PNB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Park National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- PNB’s overall lending performance is good. The bank’s percentage of loans inside its assessment areas is outstanding. The bank’s distribution of home mortgage loans by borrower income or business revenue is excellent. The bank’s geographic distribution of home mortgage, small business, and small farm loans is adequate.
- The bank’s overall level of qualified investments is excellent. PNB has an excellent record of investments in the Columbus, Ohio Assessment Area (AA) and an excellent record of investment performance in the Multi-State AA. PNB’s responsiveness to identified investment needs is adequate.
- The bank’s performance under the service test is good. The accessibility of branches to residents in low- and moderate-income geographies is good. Community development services provided are also good.

Definitions and Common Abbreviations

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

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

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development.

Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement, and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number, and dollar amount of investments, and branch distribution).

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine

the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are secured either by nonfarm or by nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in ‘loans to small farms’ as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Description of Institution

PNB is a \$6.6 billion interstate bank headquartered in Newark, Ohio. The bank has 120 full service branches and 144 ATMs located in 12 AAs in Ohio and Kentucky. We combined the six rural assessment areas into one Non-MSA AA for evaluation purposes, and we evaluated performance in each of the remaining five MSAs: Columbus, Mansfield, Dayton, Springfield, and Cincinnati separately. Since the previous CRA examination (September 13, 2010), PNB grew from \$6.2 billion in assets to \$6.6 billion as of September 30, 2013.

PNB is a subsidiary of Park National Corporation (PRK), headquartered in Newark, Ohio. The bank consists of 11 community bank divisions and there are two affiliated specialty finance companies. PNB sold Vision Bancshares, Inc., which included Vision Bank (headquartered in Panama City, Florida) and its Vision Bank Division (Gulf Shores, Alabama) in November 2011.

PNB offers a full range of credit products, trust services, and non-deposit investment services. The bank's primary focus is residential real estate lending and commercial real estate lending. PNB also offers installment loans to individuals and commercial and industrial loans. The bank offers FHA, VA and first-time homebuyer mortgage products. The bank also offers a full range of depository accounts and services through its 120 retail branches throughout Ohio. Examples of traditional services available include free checking, health savings accounts, utility payment (also offered to non-customers), and official checks and money orders. Further, the bank offers alternative banking products such as online banking, mobile banking, mobile messenger, e-statements, electronic bill pay, direct deposit, 24 hour banking by phone, and international wire transfers.

As of September 30, 2013, net loans and leases represented 69 percent of total assets. The \$4.5 billion loan portfolio consisted of real estate (\$3.0 billion), commercial and industrial (\$591 million), loans to individuals (\$674 million), agriculture (\$48 million) and other loans (\$185 million). Tier 1 capital totaled \$459 million.

No legal, financial, or other factors impeded the bank's ability to help meet the credit needs of its assessment areas during the evaluation period. The bank received a "Satisfactory" rating at the prior CRA examination dated September 13, 2010.

Scope of the Evaluation

Evaluation Period and Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under the HMDA and small loans made to businesses and farms the bank reported under the CRA, for the period from January 1, 2010 through December 31, 2012. The three-year review period relates to both the 2000 and 2010 censuses. Tables and detailed narrative are limited to the 2010-2011 review period because the majority of the lending activity occurred during that portion of the three-year review period. The 2010-2011 review period relates to the 2000 census. We analyzed 2012 lending data and included summary statements of the bank's performance in appropriate sections of this report. The 2012 portion of the review period relates to 2010 census information. Primary loan products for this review are products in which the bank originated at least 20 loans within the AA during the evaluation period. Performance tables one through 12 in appendix D include only data covered by the 2000 Census, namely loans originated in 2010 through 2011. Multifamily loans comprise a small percentage of the

bank's lending activity and had volumes too small for meaningful analysis. We reviewed community development (CD) loans, investments, and services for the period from January 1, 2010 through September 30, 2013.

Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of CD activities provided for consideration in our evaluation. This review included testing of CD loans, investments, and services to determine if they meet the definition of CD as defined in the CRA regulation. We determined that the data reported publicly and the additional data provided for this evaluation are accurate.

Selection of Areas for Full-Scope Review

We selected two AAs for a full-scope review: the Columbus, Ohio MSA AA and the Cincinnati-Middletown (OH-KY-IN) Multi-state MSA (MMSA) AA. Full-scope reviews consider performance context, and quantitative and qualitative factors. PNB's Columbus, Ohio MSA AA has the largest percentage of deposits of the bank's AAs in the state. The Cincinnati-Middletown MMSA AA includes a portion of Northern Kentucky, which by regulation requires us to evaluate as a separate rating area.

PNB also includes 15 non-urban counties in several other AAs; these 15 counties are referred to in this report as the Ohio Non-MSA AA and were aggregated as one AA for analysis purposes. Additionally, PNB includes three MSAs (Dayton, Mansfield, and Springfield) in its overall AA, which were reviewed separately for analysis purposes. The Ohio Non-MSA, Dayton MSA, Mansfield MSA, and Springfield MSA AAs were evaluated using limited-scope procedures.

Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating and the state rating. The State of Ohio rating carried the greatest weight in our conclusions as it represents the bank's most significant market in terms of deposit concentration, as well as lending, investment and service activity. AAs in order of importance, based on June 30, 2013 deposit market share, are as follows: Columbus MSA AA (36.2 percent of deposits); the Ohio Non MSA AA (33.9 percent of deposits); the Mansfield MSA AA (9.7 percent of deposits); the Springfield MSA AA (9.6 percent of deposits); the Dayton MSA AA (5.6 percent of deposits); and, the Cincinnati-Middletown MMSA AA (5.0 percent of deposits).

The multistate rating and the state rating are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Inside/Outside Ratio

This ratio is a bank-wide calculation, and not calculated by individual rating area or AA. Analysis is limited to bank originations and purchases, and does not include any affiliate data. For the combined three-year evaluation period, PNB originated a substantial majority of all loan products inside the bank's AAs (93.4 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home purchase loans (92.1 percent), home refinance loans (94.2 percent), home improvement loans (94.8 percent), loans to small businesses (93.3 percent), and loans to small farms (90.7 percent).

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), or 12 CFR 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Multistate Metropolitan Statistical Area (MMSA) Rating

Cincinnati-Middletown (OH-KY-IN) MMSA

CRA rating for the Cincinnati-Middletown (OH-KY-IN) MMSA¹: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank's lending activity in the MMSA was excellent. The geographic distribution of loans was adequate, while the borrower distribution was good.
- The bank's investment performance in the MMSA is excellent, as evidenced by the quantity of investments in an affordable housing Community Development Financial Institution with a significant volume of current housing projects in the MMSA.
- The bank's service performance in the MMSA is adequate, as branch distribution and delivery of community development services are both adequate. Branch openings and closings have not adversely affected the overall accessibility of the bank's delivery systems to low- and moderate-income geographies.

Description of Institution's Operations in the Cincinnati-Middletown MMSA

PNB operates ten branches and nine deposit taking ATMs in the MMSA AA. The AA includes portions of Ohio and Kentucky. These branches represent roughly eight percent of PNB's total branch network and five percent of total deposits. PNB maintains one branch in a moderate-income CT, which is located in Boone County, Kentucky. The remaining nine branches are located in Ohio, which includes seven in middle-income CTs and two in upper-income CTs. PNB's MMSA AA is comprised of four counties in Ohio (Butler, Clermont, Hamilton, and Warren) and one county in Kentucky (Boone). One office is located in the city of Cincinnati.

The banking industry is highly competitive in the MMSA AA, and includes many branches of national and regional banks, local community banks, credit unions, and other nonbank financial service providers. The five largest competitors in this market include JPMorgan Chase Bank, N.A.; Wells Fargo Bank, N.A.; Fifth Third Bank, Ohio; U.S. Bank North Dakota; and PNC Bank, N.A.

Refer to the market profile for the Cincinnati-Middletown MMSA in appendix C for detailed demographics and other performance context information for this AA.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Scope of Evaluation in the Cincinnati-Middletown OH-KY-IN MMSA

For analysis purposes, we combined the five counties described above into one AA, which received a full-scope review. There were no limited scope areas in this MMSA. In this evaluation, we placed greater emphasis on the bank's home mortgage lending, as the bank's loan operations in the MMSA are oriented more toward mortgage lending than small business and small farm lending due to the limited supply of farmland in the MMSA. We did not perform an analysis of small farm lending, as the bank did not originate or purchase a sufficient number of this loan type during the evaluation period to develop a meaningful analysis.

See market profile information in appendix C for discussion of community contacts conducted in conjunction with this evaluation.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Refer to table 1 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending activity in the MMSA is excellent, considering the strong level of competition for all types of loans in the bank's AA. The deposit market share was 0.44 percent as of June 30, 2012, ranking PNB 15th out of 59 deposit-taking institutions according to FDIC deposit data. PNB's primary lending products in the MMSA are home mortgage (primarily home purchase and home refinance) and small loans to businesses. Of all HMDA and CRA loans reported, HMDA loans represented 63 percent, while small loans to businesses represented 37 percent. PNB's home purchase market share was 0.31 percent, ranking 48th out of 299 lenders in the market. The bank's market share for home improvement loans was 1.83 percent, ranking 14th out of 107 lenders in the market. The bank's market share for home refinance loans was 0.29 percent, ranking 129th out of 359 lenders in the market. The bank's small loans to businesses market share was 0.55 percent, ranking 21st out of 92 lenders in the market. Large national credit card lenders dominated the small business market holding three of the top four positions, accounting for 45 percent of the market. PNB also faces strong competition in the mortgage market as the top five lenders controlled between 41 and 48 percent of the individual product markets. The bank's performance in 2012 was consistent with the performance noted in 2010 through 2011.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending was adequate. Due to the high volume of home purchase and home refinance loans reported by the bank, we placed more weight on the bank's performance regarding home mortgage loans, in particular home purchase and home refinance. There was also more volume during the 2010-2011 portion of the three-year review period. Therefore, we

placed more weight on the bank's performance in 2010 through 2011 than the bank's performance in 2012.

Home Mortgage Loans

Refer to tables 2, 3, and 4, in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage originations and purchases.

Overall, the geographic distribution of home mortgage loans is adequate. In evaluating the geographic distribution of home mortgage loans, we considered the number of owner-occupied housing units located in the low-income CTs. Approximately three percent of owner-occupied housing units are located in low-income CTs. This has an impact on the opportunity to lend in those low-income areas.

The overall geographic distribution of home purchase loans is adequate. The bank's geographic distribution of home purchase loans during 2010 through 2011 was adequate. The percentage of loans in low-income CTs exceeded the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income CTs was significantly below the percentage of owner-occupied units within those geographies. With a home-purchase market share of only 0.31 percent, an analysis of market share performance in low- and moderate-income CTs was not meaningful. The bank's performance in 2012 was weaker than the performance noted in 2010 through 2011. The weaker performance in 2012 related to poor penetration of low-income CTs.

The overall geographic distribution of home improvement loans is adequate. The bank's geographic distribution of home improvement loans during 2010 through 2011 was adequate. The percentage of loans in low-income CTs was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income CTs exceeded the percentage of owner-occupied units in these geographies. The bank's market share in low-income CTs was significantly below its overall market share for home improvement loans. The bank's market share in moderate-income CTs exceeded its overall market share for home improvement loans. The bank's performance in 2012 was consistent with the performance noted in 2010 through 2011.

The overall geographic distribution of home refinance loans is poor. The bank's geographic distribution of home refinance loans during 2010 through 2011 was poor. The percentage of loans in both low- and moderate-income CTs was significantly below the percentage of owner-occupied units in these geographies. With a home-refinance market share of 0.29 percent, an analysis of market share performance in low- and moderate-income CTs was not meaningful. The bank's performance in 2012 was consistent with the performance noted in 2010 through 2011.

Small Loans to Businesses

Refer to Table 6 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The bank's geographic distribution of small loans to businesses in 2010 through 2011 was excellent. The percentage of small loans made in low-income CTs approximated the portion of businesses in those geographies. The

percentage of small loans made in moderate-income CTs exceeded the percentage of businesses in those geographies. With a market share of 0.55 percent for business loans, an analysis of market share performance in low- and moderate income CTs was not meaningful. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed PNB's home mortgage and small loans to businesses activity over the evaluation period in the multistate AA to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. The bank's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any low- or moderate-income areas.

Inside/Outside Ratio

The inside/outside ratio was performed at the bank level. The analysis included only originations and purchases. Refer to the Scope of Evaluation section for details.

Distribution of Loans by Income Level of the Borrower

Overall, the borrower distribution of the bank's lending was good. As noted previously, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity in the multistate MA. Because the bank reported more loans in the 2010-2011 portion of the three-year review period, we attributed more weight to the bank's performance in 2010 through 2011 than its performance in 2012.

Home Mortgage Loans

Overall, the borrower distribution of home mortgage lending is good.

In evaluating the borrower distribution of home mortgage loans, we considered the number of families that live below the poverty level and the associated barriers to homeownership this creates. This can affect the bank's opportunity to lend to the low-income segment of the population. Refer to Tables 8, 9, and 10 in the multistate section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home-mortgage loan originations and purchases.

The overall borrower distribution of home purchase loans is excellent. The bank's borrower distribution of home purchase loans during 2010 through 2011 was excellent. The percentage of loans to low-income borrowers was near the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. With a market share of 0.31 percent for home purchase loans, an analysis of market share performance to low- and moderate income borrowers was not meaningful. The bank's performance in 2012 was weaker than the performance noted in 2010 through 2011, because the market penetration level of the moderate-income segment of the population declined, but performance was still good.

The overall distribution of home improvement loans is excellent. The bank's borrower distribution of home improvement loans during 2010 through 2011 was good. The percentage of loans to low-income borrowers was near the percentage of low-income families. The portion of loans to moderate-income

borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was below its overall market share for home improvement loans. The bank's market share of loans to moderate-income borrowers exceeded its overall market share for home improvement loans. The bank's performance in 2012 was better than the performance noted in 2010 through 2011, because the market penetration level of the low-income segment of the population improved to excellent.

The overall distribution of home refinance loans is good. The bank's borrower distribution of home refinance loans during 2010 through 2011 was good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. With a market share of 0.29 percent for home refinance loans, an analysis of market share performance to low- and moderate-income borrowers was not meaningful. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

Small Loans to Businesses

Refer to Table 11 in the "Multistate Metropolitan Statistical Area(s)" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent. The bank's borrower distribution of small loans to businesses in 2010 through 2011 was excellent. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was near the percentage of small businesses. The bank's market share of loans to small businesses exceeded its overall market share of loans to small businesses. The bank's performance in 2012 was weaker than the performance in 2010 through 2011 but was still considered good. The percentage of small loans to businesses in 2012 was below the percentage of small businesses. This performance did not have a negative impact on the overall small loans to businesses borrower distribution conclusion for the AA.

Community Development Lending

Refer to Table 1 Lending Volume in the Multistate Metropolitan Area section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

PNB's level of CD lending had a neutral impact on its overall lending performance in the multistate MA. PNB reported one loan totaling \$2,153,000 to an organization providing affordable housing to LMI individuals.

Product Innovation and Flexibility

PNB offers a standard product mix of loans including Federal Housing Administration (FHA), Veteran's Administration (VA), Guaranteed Rural Housing (GRH), and Small Business Administration (SBA) loans. PNB also offers Freddie Mac's relief refinance program to borrowers who have had difficulty refinancing due to declining property values. Further, PNB participates in the Federal Home Loan

Bank's Welcome Home Program, the funds from which assist low- or moderate-income individuals in the purchase of homes.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Multistate MA is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Cincinnati MMSA AA is excellent.

During the evaluation period, PNB originated four qualified investments and donations totaling \$5,668,000 in the Cincinnati MMSA AA. In addition, the prior period investments (still outstanding) equated to seven investments with a remaining balance of \$919 thousand as of September 30, 2013.

The majority of PNB's qualified investments respond to the Cincinnati MMSA AA's need for affordable housing through low-income housing tax credits (LIHTC). The primary qualified investment made in the current period was to the Ohio Capital Corporation for Housing (OCCH), which is an independent, mission-driven nonprofit corporation that works with private and public developers to create affordable housing opportunities. The investment figure above includes a pro-rata figure based on the location of OCCH affordable housing projects throughout its service area, which is Ohio and bordering states. PNB made qualified grants to organizations that support job training, child welfare, and emergency food needs in the community.

Refer to Table 14 of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Multistate MA is rated "Low Satisfactory." Based on the full-scope review, the bank's performance in the Cincinnati MMSA AA is adequate.

Retail Banking Services

Refer to Table 15 of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

PNB's branch distribution in the Cincinnati MMSA AA is adequate. The bank's branch distribution in 2010 through 2011 was adequate. Branches were reasonably accessible to geographies and individuals of different income levels. There are no branches located in low-income CTs of the Cincinnati MMSA; however, the population in these CTs is low. Access to branches in moderate-income CTs was excellent as compared to the distribution of population living in these CTs. The bank's branch distribution performance was weaker in the 2012 through 2013 analysis period than noted in the 2010 through 2011 analysis period. However, the decline in performance was due to CT income designation changes in the 2010 census, which caused a moderate-income branch to be re-designated as middle-income. Upon further analysis, the branch was still near other moderate-income CTs. Near-to-branches are those located in middle- or upper-income geographies that are within one half mile of a low- or moderate-

income geography. The 2012 through 2013 performance did not have an impact on the overall branch distribution conclusion for the Cincinnati MMSA AA.

Branch openings and closings have not adversely affected the overall accessibility of the bank's delivery systems to low- and moderate-income CTs. During the evaluation period, the bank closed one branch in an upper-income CT. This closure was due to a reduction in business activity at the branch.

PNB's hours and services offered through the Multistate AA were adequate. PNB hours and services offered do not vary in a way that would inconvenience customers based on CT income level.

Management complements its traditional service delivery methods with certain alternative delivery processes, such as: online banking, mobile banking, mobile messenger, e-statements, electronic bill pay, direct deposit, 24 hour banking by phone, and international wire transfers.

Community Development Services

PNB's performance in providing community development services in the Cincinnati MMSA AA was adequate. In the Cincinnati MMSA AA, 10 employees provided their expertise to 15 different community development organizations. Ten bank employees served as either board or committee members of community development organizations. Those organizations operate to meet affordable housing, affordable healthcare, and child welfare needs of LMI individuals. Further, one bank employee served on the loan committee of a company certified by the SBA to offer SBA 504 programs. Two bank employees volunteered to assist two community development organizations by providing financial recordkeeping assistance. In addition, three employees participated with five schools by teaching financial literacy classes in schools where a majority of students qualify for free- or reduced-priced lunches. Further, many other financial literacy classes were also presented to schools with significant percentages of students who qualify for free- or reduced-priced lunches.

State Rating

State of Ohio

CRA Rating for Ohio²:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- The bank's lending activity in Ohio is good. The geographic distribution was adequate, while the borrower income distribution was excellent.
- The bank's investment test performance in Ohio is excellent, as evidenced by the quantity of investments in an affordable housing Community Development Financial Institution with a significant volume of current housing projects in Ohio.
- The bank's service test performance in Ohio is good, as branch distribution and delivery of community development services are good in the 2012 through 2013 review period. Branch openings and closings have not adversely affected the overall accessibility of the bank's delivery systems to low- and moderate-income geographies.

Description of Institution's Operations in Ohio

The bank had 10 AAs in the State of Ohio. These AAs included portions of four MSAs, and a geographically dispersed area of 15 counties that make up what is referred to throughout this report as the Ohio Non-MSA AA. The nature of operations in Ohio is essentially similar to those described in the description of the institution's operations in the multistate area.

PNB operates 110 branches and 135 deposit taking ATMs in the State of Ohio. These branches represent roughly 92 percent of PNB's total branch network, and 95 percent of deposits. PNB provides a full range of loan and deposit products to all AAs. There was one branch opening and two branch closings in the state during the evaluation period. As of June 30, 2012, when combining all the AAs, the PNB ranked fifth in deposits, representing a 6.8 percent market share.

The Columbus MSA AA is the bank's most significant AA in the state, accounting for 38 percent of deposits. The banking industry is highly competitive in the AA and includes branches of national, regional and community banks. As of June 30, 2012, PNB ranked sixth in the Columbus MSA AA in deposits, representing a 4.0 percent market share. The five largest competitors in the AA include Huntington National Bank, JP Morgan Chase Bank, N.A., PNC Bank, N.A., Fifth Third Bank, and Nationwide Bank.

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the market profiles for the state of Ohio in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Ohio

The Columbus MSA AA was selected for a full-scope review due to its high concentration of deposits (38.4 percent), and branches (29.1 percent) within the state. This concentration of deposits in the Columbus MSA AA exceeds those in the Ohio Non-MSA AA (35.3 percent), Springfield MSA AA (10.3 percent), Mansfield MSA AA (10.2 percent), and Dayton MSA AA (5.8 percent). The Ohio Non-MSA AA, Mansfield MSA AA, Springfield MSA AA, and the Dayton MSA AA were analyzed using limited-scope procedures. PNB's performance within the State of Ohio has the most significant impact on the bank's overall CRA rating do to the high percentage of deposits in the state rating area compared to the multistate rating area. In this evaluation, for the 2010-2011 portion of the three-year review period, we weighted home mortgage lending and small business/small farm lending equally, as the loan volumes were similar. During 2012, we provided greater weight to the mortgage lending, as the volume increased significantly in relation to the small business/small farm lending. PNB's performance in the Columbus MSA AA has the most significant impact on the Ohio Rating do to the Columbus MSA AA having the highest percentage of deposits. Refer to Appendix A for a listing of the areas that comprise the State of Ohio AAs.

See market profile information in Appendix C for discussion of community contacts conducted in conjunction with this evaluation.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Refer to Table 1 Lending Volume in the State of Ohio section of appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending activity in Ohio is good considering the strong level of competition for all types of loans in the bank's AA. Many competitors are national or regional banks. PNB's good performance in originating small loans to businesses and small loans to farms when compared to its competitors supports this conclusion.

In the Columbus MSA AA, the deposit market share was 4.51 percent at June 30, 2011, ranking PNB 6th out of 52 deposit-taking institutions according to FDIC deposit data. PNB's primary lending products in the Ohio area are home mortgage (primarily purchase and refinance) and small loans to businesses. Of all HMDA and CRA loans reported in the Columbus MSA AA, HMDA loans represented 58 percent of reported loans, while small loans to small businesses and farms represented 42 percent. PNB's home purchase market share was 1.76 percent, ranking 13th out of 310 lenders in the market. The bank's home improvement market share was 15.78 percent, ranking first out of 114 lenders in the market. The bank's home refinance market share was 2.07 percent, ranking 11th out of 354 lenders in the market. The

bank's small loans to businesses market share was 3.41 percent, ranking ninth of 84 lenders in the market. The bank's small loans to farms market share was 36.18 percent, ranking first out of 20 lenders in the market. Further, many national credit card lenders dominated the small loans to businesses market. PNB also faces strong competition from national and regional banks in the mortgage purchase and refinance markets as the top five lenders controlled between 37 and 44 percent of the markets, respectively. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is adequate. Due to the volume of home mortgage loans reported by the bank, we placed equal weight on the bank's home mortgage lending when compared to small loans to businesses/farms. Because the bank reported more loans in the 2010-2011 portion of the three-year review period, we attributed more weight to the bank's performance in 2010 through 2011 than its performance in 2012.

Home Mortgage Loans

Overall, the geographic distribution of home mortgage loans is adequate.

Refer to Tables 2, 3, and 4 in the State of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

In evaluating the geographic distribution of home mortgage loans, we considered the number of owner-occupied housing units located in low-income CTs. Approximately three percent of owner-occupied housing units are located in those low-income CTs. This has an impact on the opportunity to lend in low-income CTs.

The overall geographic distribution of home purchase loans is adequate. The bank's geographic distribution of home purchase loans during 2010 through 2011 was adequate. The percentage of loans in low-income CTs was below the percentage of owner-occupied units in these CTs. The portion of loans made to moderate-income CTs exceeded the percentage of moderate-income families within those CTs. The bank's market share in low-income CTs was below its overall market share for home purchase loans. The bank's market share in moderate-income CTs exceeded its overall market share for home purchase loans. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

The overall geographic distribution of home improvement loans is adequate. The bank's geographic distribution of home improvement loans during 2010 through 2011 was adequate. The percentage of loans in low-income CTs was below the percentage of owner-occupied units in these CTs. The percentage of loans in moderate-income CTs exceeded the percentage of owner-occupied units in these CTs. The bank's market share in low-income CTs was below its overall market share for home improvement loans. The bank's market share in moderate-income CTs exceeded its overall market share for home improvement loans. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

The overall geographic distribution of home refinance loans is adequate. The bank's geographic distribution of home refinance loans during 2010 through 2011 was adequate. The percentage of loans

in low- income CTs was below the percentage of owner-occupied units in these CTs. The percentage of loans in moderate-income CTs exceeded the percentage of owner-occupied units in these CTs. The bank's market share in low-income CTs was below its overall market share for home refinance loans. The bank's market share in moderate-income CTs exceeded its overall market share for home refinance loans. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

Small Loans to Businesses

Refer to Table 6 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The bank's geographic distribution of small loans to businesses in 2010 through 2011 was excellent. The percentage of loans made in low-income CTs exceeded the percentage of businesses in those CTs. The percentage of loans made in moderate-income CTs exceeded the percentage of businesses in those CTs. The bank's market share in low-income CTs exceeded its overall market share for small loans to businesses. The bank's market share in moderate-income CTs exceeded its overall market share for small loans to businesses. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

Small Loans to Farms

Refer to Table 7 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms is good. The bank's geographic distribution of small loans to farms in 2010 through 2011 was good. PNB did not report any loans made in low-income CTs; however, there are very few farms located in the low-income geographies. The percentage of loans made in moderate-income CTs exceeded the percentage of farms in those CTs. The bank's market share in low-income CTs was significantly below its overall market share for small loans to farms. The bank's market share in moderate-income CTs exceeded its overall market share for small loans to farms. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed PNB's home mortgage and small business lending activity over the evaluation period in the Columbus MSA AA to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. The bank's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any low- or moderate-income areas.

Inside/Outside Ratio

The inside/outside ratio was performed at the bank level. The analysis included only originations and purchases. Refer to the Scope of Evaluation section for details.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of the bank's lending is excellent. As noted previously, we placed equal weight on the bank's home mortgage lending and small loans to businesses and farms. We attributed more weight to the bank's performance in 2010 through 2011 than its performance in 2012.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Overall, the borrower distribution of home mortgage loans is excellent. In evaluating the borrower distribution of home mortgage loans, we considered the number of families that live below the poverty level and the associated barriers to homeownership this creates. This can affect the bank's opportunity to lend to the low-income segment of the population.

The overall borrower distribution of home purchase loans is excellent. The bank's borrower distribution of home purchase loans during 2010 through 2011 was excellent. The percentage of loans to low-income borrowers was near the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded its overall market share for home purchase loans. The bank's market share of loans to moderate-income borrowers exceeded its overall market share for home purchase loans. The bank's performance in 2012 was weaker than the performance noted in 2010 through 2011, but was still good. In 2012, the percentage of loans to low-income borrowers was below the percentage of low-income families, and the market share of the moderate-income segment of the population declined.

The overall distribution of home improvement loans is excellent. The bank's borrower distribution of home improvement loans during 2010 through 2011 was excellent. The percentage of loans to low-income borrowers exceeded the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded its overall market share for home improvement loans. The bank's market share of loans to moderate-income borrowers exceeded its overall market share for home improvement loans. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

The overall distribution of home refinance loans is good. The bank's borrower distribution of home refinance loans during 2010 through 2011 was good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded its overall market share for home refinance loans. The bank's market share of loans to moderate-income borrowers exceeded its overall market share for home refinance loans. The bank's performance in 2012 was not inconsistent with the performance noted in 2010 through 2011.

Small Loans to Businesses

Refer to Table 11 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent. The bank's borrower distribution of small loans to businesses in 2010 through 2011 was excellent. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) exceeded the percentage of small businesses. The bank's market share of loans to small businesses exceeded its overall market share of loans to businesses. The bank's performance in 2012 was not inconsistent with the performance in 2010 through 2011.

Small Loans to Farms

Refer to Table 12 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall borrower distribution of small loans to farms is excellent. The bank's borrower distribution of loans to small farms in 2010 through 2011 was excellent. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) was near the percentage of small businesses. The bank's market share of loans to small farms exceeded its overall market share of loans to small businesses. The bank's performance in 2012 was not inconsistent with the performance in 2010 through 2011.

Community Development Lending

Refer to Table 1 Lending Volume in the Ohio section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

PNB's level of CD lending had a neutral impact on its overall lending performance in the Columbus MSA AA. PNB reported 32 loans totaling \$7,700,000 primarily to organizations providing affordable housing or community services to LMI individuals.

Product Innovation and Flexibility

PNB offers a standard product mix of loans including Federal Housing Administration (FHA), Veteran's Administration (VA), Guaranteed Rural Housing (GRH), and Small Business Administration (SBA) loans. PNB also offers Freddie Mac's relief refinance program to borrower's who have had difficulty refinancing due to declining property values. Further, PNB participates in the Federal Home Loan Bank's Welcome Home Program, the funds from which are designed to assist low- or moderate-income individuals in the purchase of homes.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Ohio Non-MSA AA, the Dayton MSA AA, and the Mansfield MSA AA is not inconsistent with the bank's overall good performance under the lending test in Ohio. In the Springfield MSA AA, the bank's performance is

stronger than the bank's overall performance in the state due to good geographic distribution. The stronger performance in the Springfield MSA AA had no impact on the overall lending test rating for Ohio. In all the limited scope areas, small farm lending performance was weaker than observed in the state as a whole. The weaker performance in the other AAs had no impact on the overall lending test rating for Ohio. Refer to the Tables 1 through 12 in the state of Ohio section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Outstanding." Based on a full-scope review, the bank's performance in the Columbus MSA AA is excellent.

During the evaluation period, PNB originated four qualified investments and donations totaling \$11,494,000 in the Columbus MSA AA. In addition, the prior period investments (still outstanding) equated to nine investments with a remaining balance of \$1,734,000 as of September 30, 2013.

The majority of PNB's qualified investments respond to the state's need for affordable housing through Low-Income Housing Tax Credits (LIHTC). The primary qualified investment made in the current period was to the OCCH, which is an independent, mission-driven nonprofit corporation that works with private and public developers to create affordable housing opportunities. The investment figure above includes a pro-rata figure based on the location of OCCH affordable housing projects throughout its service area, which is Ohio and bordering states. PNB also made qualified grants to organizations that support job training, child welfare, homeless shelters, and emergency food needs in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the investment test in the Ohio Non-MSA AA, the Mansfield MSA AA, the Springfield MSA AA, and the Dayton MSA AA is consistent with the bank's overall "Outstanding" performance under the investment test in Ohio. We allocated the investment to the AAs based on the location of OCCH housing projects in each AA. We also considered the number of low- and moderate-income families in the AAs. PNB also made qualified grants to organizations that support job training, child welfare, homeless shelters and emergency food relief in the various communities.

Refer to Table 14 of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Columbus MSA AA is good.

Retail Banking Services

Refer to Table 15 of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

PNB's branch distribution in the Columbus MSA AA is good. The bank's branch distribution in 2010 through 2011 was adequate. Branches were reasonably accessible to geographies and individuals of different income levels. There was one branch located in a low-income CT. The percentage of the population in low-income CTs is low. Access to branches in moderate-income CTs was adequate as compared to the distribution of population living in these CTs. Accessibility in moderate-income CTs improved after considering near-to branches. Near-to-branches are those located in middle- or upper-income CTs that are within one half mile of a low- or moderate-income CT. PNB's branch distribution in the 2012 through 2013 analysis period was superior to that of the 2010 through 2011 analysis period and had a positive impact on the overall branch distribution conclusion for Ohio. In the 2012 through 2013 analysis period, access to branches in moderate-income CTs was excellent as compared to the distribution of population living in these geographies.

Branch openings and closings have generally not adversely affected the overall accessibility of the bank's delivery systems to low- and moderate-income CTs. During the evaluation period, the bank closed one branch in a moderate-income CT. This closure was due to a reduction in business activity at the branch. The branch was located in a grocery store, and PNB maintains a traditional full service branch elsewhere in the same moderate-income CT.

PNB's hours and services offered through Ohio were adequate. PNB's hours and services offered do not vary in a way that would inconvenience based on CT income level.

Management complements its traditional service delivery methods with certain alternative delivery processes, such as: online banking, mobile banking, mobile messenger, e-statements, electronic bill pay, direct deposit, 24 hour banking by phone, and international wire transfers.

Community Development Services

PNB's performance in providing community development services in the Columbus MSA AA was good. In the Columbus MSA AA, 21 employees provided their expertise to 41 different community development organizations. In 37 instances, we noted employees serving as either board or committee members of community development organizations. Those organizations operate to meet affordable housing, affordable healthcare, financial literacy, and child welfare needs of LMI individuals. In addition, 21 employees participated with the Newark City School District by teaching financial literacy classes in schools where a majority of students qualify for free- or reduced-priced lunches. Further, many other financial literacy classes were also presented to schools with significant percentages of students who qualify for free- or reduced-priced lunches.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Ohio Non-MSA AA, the Dayton MSA AA, the Mansfield MSA AA, and the Springfield MSA AA is consistent with the bank's overall good performance in Ohio. The bank's performance in the Mansfield MSA AA is better than the overall performance in the state due to the excellent banking office distribution in that AA. In the Ohio Non-MSA AA and Dayton MSA AAs, the performance was weaker than the bank's overall

performance in Ohio, but was considered adequate. Performance differences in these areas were based on weaker branch distribution, but did not impact the bank's Ohio rating.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/2010 to 12/31/2012) Investment and Service Tests and CD Loans: (01/01/2010 to 09/30/2013)	
Financial Institution	Products Reviewed	
Park National Bank (PNB) Newark, OH	Home Purchase, Home Improvement, and Home Refinance loans: Small Loans to Businesses, Small Loans to Farms; Community Development Loans, investments, and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.		No affiliate products reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information-counties that comprise the Assessment Areas
Cincinnati-Middletown OH-KY-IN Multistate MSA	Full Scope	Butler, Clermont, Hamilton, and Warren in Ohio. Boone in Kentucky.
Ohio Columbus MSA	Full Scope	Delaware, Fairfield, Franklin, Licking, Madison, and Morrow
Ohio Non-MSA	Limited Scope	Ashland, Athens, Champaign, Coshocton, Crawford, Darke, Fayette, Hocking, Holmes, Knox, Marion, Mercer, Muskingum, Perry and Tuscarawas
Dayton MSA	Limited Scope	Greene, Miami, and Montgomery
Mansfield MSA	Limited Scope	Richland
Springfield MSA	Limited Scope	Clark

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS Park National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Park National Bank	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Cincinnati MMSA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Ohio	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

Cincinnati Multistate Metropolitan Area

Demographic Information for Full-Scope Area: Cincinnati Multistate Metropolitan Area-2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	384	11.46	21.35	42.97	23.18	1.04
Population by Geography	1,600,461	6.97	17.93	45.54	29.44	0.11
Owner-Occupied Housing by Geography	412,156	2.36	14.41	49.13	34.09	0.00
Businesses by Geography	154,881	4.54	15.14	44.77	34.80	0.00
Farms by Geography	3,817	1.13	11.45	55.86	31.46	0.00
Family Distribution by Income Level	418,323	18.71	17.93	22.68	40.69	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	153,252	11.78	26.58	46.34	15.29	0.00
Median Family Income						
HUD Adjusted Median Family Income for 2011	= \$54,771					
Households Below the Poverty Level	= 10%					
			Median Housing Value		= \$120,790	
			Unemployment Rate (July 2010)		= 9.8%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census and 2011 HUD updated MFI.

Demographic Information for Full-Scope Area: Cincinnati Multistate Metropolitan Area-2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	397	13.10	22.67	38.79	24.43	1.01
Population by Geography	1,699,371	7.39	19.41	41.21	31.31	0.68
Owner-Occupied Housing by Geography	443,166	3.18	15.65	45.20	35.96	0.00
Businesses by Geography	151,440	6.64	20.73	39.34	33.23	0.00
Farms by Geography	3,888	2.24	12.35	54.01	31.38	0.00
Family Distribution by Income Level	430,624	20.61	16.83	20.76	41.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	161,246	12.62	28.12	43.22	16.03	0.01
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below the Poverty Level	= \$67,515 = \$71,300 = 12.3%	Median Housing Value = \$165,978 Unemployment Rate (November 2013) = 6.8%				

* The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 U.S. Census and 2012 HUD updated MFI.

The multistate AA consists of Butler, Clermont, Hamilton, and Warren Counties in Ohio and Boone County in Kentucky. At the 2010 census, the AA contains 397 census tracts of which 13.10 percent are low-income, 22.67 percent are moderate-income, 38.79 percent are middle-income, and 24.43 percent are upper-income. Both low- and moderate-income census tracts increased slightly from the percentages reported by the 2000 census. The 2012 HUD adjusted median family income for the AA is \$71,300. Approximately 12.3 percent of the households fall below the poverty level.

As of June 30, 2012, PNB had \$260 million in deposits in the Cincinnati MSA AA, which ranked fourteenth of 58 FDIC insured institutions. PNB's market share was 0.43 percent, and there are 623 banking offices operating in the AA. Two institutions (Fifth Third and U.S. Bank) hold 70 percent of area deposits. Presently PNB operates 10 branches in the AA.

Economic conditions have been improving as evidenced by declining unemployment. The unemployment rate at November 2013 was 6.8 percent, down from 9.8 percent reported on the previous CRA evaluation. The current unemployment rate is slightly better than the statewide rate of 7.4 reported on November 2013 by the Ohio Department of Jobs and Family Services. The Cincinnati-Middletown recovery is expected to accelerate over the next few years. Professional and business services, manufacturing, and healthcare will be the key pillars of growth. Payroll employment will reach its pre-recession peak by mid-2015. In addition, a well-educated workforce will help the metro area outpace Ohio in terms of job growth over the long run.

Community Contacts:

We considered information obtained from two affordable housing organizations and a non-profit charity. The organizations indicated needs for financial literacy program support, improved availability of small dollar lending for smaller businesses and housing improvements. Further, we identified the need for additional volunteers to serve on projects or as committee or board members of community development organizations.

Columbus, OH MA

Demographic Information for Full-Scope Area: Columbus Ohio MSA AA—2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	366	9.56	27.05	38.25	25.14	0.00
Population by Geography	1,519,058	6.87	23.36	41.09	28.68	0.00
Owner-Occupied Housing by Geography	376,873	3.06	18.20	44.74	34.00	0.00
Businesses by Geography	164,981	6.18	17.12	39.35	37.35	0.00
Farms by Geography	4,269	1.48	11.97	58.28	28.27	0.00
Family Distribution by Income Level	389,723	19.50	18.46	22.99	39.05	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	147,944	11.36	34.26	41.28	13.10	0.00
Median Family Income						
HUD Adjusted Median Family Income for 2011	= \$54,708					
Households Below the Poverty Level	= \$66,600					
	= 10%					
			Median Housing Value		= 119,955	
			Unemployment Rate (July 2010)		= 9.2%	

* The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 U.S. Census and 2012 HUD updated MFI.

Demographic Information for Full-Scope Area: Columbus Metropolitan Area-2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	362	17.68	26.24	33.43	22.10	0.55
Population by Geography	1,554,324	12.48	22.96	38.46	25.63	0.47
Owner-Occupied Housing by Geography	371,092	6.29	20.50	42.28	30.93	0.00
Businesses by Geography	146,316	10.38	20.96	36.90	31.41	0.00
Farms by Geography	3,734	4.42	17.22	54.66	23.65	0.00
Family Distribution by Income Level	375,121	23.46	18.21	21.07	37.26	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	156,308	19.06	32.51	36.62	11.81	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below the Poverty Level	= \$66,337 = \$67,500 = 14.1%	Median Housing Value = \$156,761 Unemployment Rate (November 2013) = 6.1%				

* The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 U.S. Census and 2012 HUD updated MFI.

The Columbus OH MSA AA consists of Franklin, Fairfield, Licking, Madison, and Morrow. Prior to December 31, 2011, the AA also included Delaware County. PNB maintains no deposit taking facilities in the counties not included in the Columbus MSA AA. At the 2010 census, the AA contains 362 census tracts of which 17.68 percent are low-income, 26.24 percent are moderate-income, 33.43 percent are middle-income, and 22.10 percent are upper-income. The percentage of low-income census tracts increased significantly from the percentage reported by the 2000 census. The 2012 HUD adjusted median family income for the AA is \$67,500. Approximately 14.1 percent of the households fall below the poverty level.

As of June 30, 2012, PNB had \$1,788 million in deposits in the Columbus MSA AA, which ranked sixth of 47 FDIC insured institutions. PNB's market share was 4.04 percent, and there are 473 banking offices operating in the AA. Two institutions (Huntington and JPMorgan Chase) hold 50 percent of area deposits. Presently PNB operates 32 branches in the AA.

Economic conditions have been improving as evidenced by declining unemployment. The unemployment rate at November 2013 was 6.1 percent, down from 9.2 percent reported on the previous CRA evaluation. The current unemployment rate is slightly better than the statewide rate of 7.4 percent reported on November 2013 by the Ohio Department of Jobs and Family Services. Columbus' recovery is strengthening. The labor force is expected to increase in the near term, preventing the unemployment rate from improving significantly. Still, the jobless rate is expected to remain around 6% in 2014, better than the 9% seen during the past recession. Professional, financial, and health services will be the primary drivers of growth over the next several years.

Community Contacts:

We considered information obtained from three affordable housing organizations and a non-profit community services provider. The organizations indicated needs for bank branching in low- and moderate-income communities, financial literacy programs, and credit building products.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - NA, Insufficient loan volume to analyze.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - 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 households 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 MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: PARK NB 2010-2011						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Multistate Full Review:												
Cincinnati MMSA 5-county AA	4.36	489	77,762	288	68,347	2	199	0	2,153	779	146,308	5.23
Ohio Full Review:												
Columbus OH MSA 6-county AA 2010-2011	30.50	3,401	431,897	1,866	283,641	180	16,846	32	7,700	5,447	732,384	38.96
Ohio Limited Review:												
Dayton OH MSA 3-county AA	6.94	666	75,666	476	77,296	97	7,728	1	200	1,239	160,690	6.04
Mansfield OH MSA AA	8.28	661	65,704	790	91,607	27	1,366	4	1,080	1,478	158,677	9.32
Ohio Non-MSA 15-county AA	41.86	4,086	428,044	2,529	287,511	862	71,208	6	5,712	7,477	786,763	31.67
Springfield OH MSA AA	8.06	500	38,245	734	103,450	206	22,044	0	0	1,440	163,739	8.78

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2010 to December 31, 2011.

*** Deposit Data as of February 04, 2014. Rated Area refers to the state, multi-state MSA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: PARK NB 2010-2011								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total **	% 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
Multistate Full Review:															
Cincinnati MMSA 5-county AA	115	4.68	2.36	2.61	14.41	6.09	49.13	60.00	34.09	31.30	0.31	0.97	0.21	0.32	0.31
Ohio Full Review:															
Columbus OH MSA 6-county AA 2010-2011	764	31.08	3.06	1.05	18.20	24.61	44.74	51.05	34.00	23.30	1.76	0.54	4.36	2.19	0.84
Ohio Limited Review:															
Dayton OH MSA 3-county AA	145	5.90	2.03	0.00	18.03	16.55	48.40	53.79	31.54	29.66	0.72	0.00	1.01	0.81	0.55
Mansfield OH MSA AA	167	6.79	0.16	0.00	14.17	5.39	58.08	59.88	27.58	34.73	8.13	0.00	9.84	9.01	6.58
Ohio Non-MSA 15-county AA	1,141	46.42	0.03	0.26	9.45	6.57	78.61	80.89	11.90	12.27	10.15	100.00	7.79	10.34	10.12
Springfield OH MSA AA	126	5.13	1.73	3.17	9.72	2.38	59.32	71.43	29.23	23.02	4.99	25.00	1.96	5.71	3.73

* Based on 2011 Peer Mortgage Data (USPR)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: PARK NB 2010-2011					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *													
	#	% of Total **	% 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									
Multistate Full Review:																								
Cincinnati MMSA 5-county AA	28	2.90	2.36	0.00	14.41	17.86	49.13	50.00	34.09	32.14	1.83	0.00	2.60	1.97	1.51									
Ohio Full Review:																								
Columbus OH MSA 6-county AA 2010-2011	293	30.36	3.06	0.00	18.20	22.53	44.74	64.16	34.00	13.31	15.78	0.00	20.59	21.82	6.85									
Ohio Limited Review:																								
Dayton OH MSA 3-county AA	49	5.08	2.03	0.00	18.03	14.29	48.40	71.43	31.54	14.29	6.31	0.00	6.59	9.73	1.99									
Mansfield OH MSA AA	75	7.77	0.16	0.00	14.17	14.67	58.08	65.33	27.58	20.00	30.72	0.00	35.71	32.65	24.39									
Ohio Non-MSA 15-county AA	397	41.14	0.03	0.25	9.45	3.27	78.61	82.87	11.90	13.60	36.19	50.00	24.24	37.04	34.62									
Springfield OH MSA AA	123	12.75	1.73	0.81	9.72	9.76	59.32	65.85	29.23	23.58	35.11	0.00	75.00	41.07	20.90									

* Based on 2011 Peer Mortgage Data (USPR)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PARK NB 2010-2011								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total **	% 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
Multistate Full Review:															
Cincinnati MSA 5-county AA	335	5.29	2.36	0.30	14.41	7.46	49.13	59.40	34.09	32.84	0.29	0.00	0.45	0.40	0.20
Ohio Full Review:															
Columbus OH MSA 6-county AA 2010-2011	2,326	36.73	3.06	0.56	18.20	19.99	44.74	54.34	34.00	25.11	2.07	0.51	5.87	3.08	0.95
Ohio Limited Review:															
Dayton OH MSA 3-county AA	468	7.39	2.03	0.00	18.03	17.74	48.40	55.98	31.54	26.28	1.03	0.00	2.38	1.40	0.56
Mansfield OH MSA AA	416	6.57	0.16	0.00	14.17	2.88	58.08	60.82	27.58	36.30	9.41	0.00	6.45	9.77	9.22
Ohio Non-MSA 15-county AA	2,540	40.11	0.03	0.00	9.45	3.86	78.61	81.26	11.90	14.88	12.90	0.00	10.86	13.04	12.81
Springfield OH MSA AA	248	3.92	1.73	1.21	9.72	10.48	59.32	56.85	29.23	31.45	6.08	25.00	17.39	6.67	4.36

* Based on 2011 Peer Mortgage Data (USPR)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: PARK NB 2010-2011						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011								
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *						
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Multistate Full Review:																	
Cincinnati MSA 5-county AA	288	4.31	4.54	4.51	15.14	18.40	44.77	50.69	34.80	26.39	0.55	0.65	0.72	0.63	0.40		
Ohio Full Review:																	
Columbus OH MSA 6-county AA 2010-2011	1,866	27.92	6.18	7.50	17.12	26.58	39.35	44.86	37.35	21.06	3.41	5.96	4.44	4.25	1.99		
Limited Review:																	
Dayton OH MSA 3-county AA	476	7.12	5.20	1.26	17.28	28.99	43.08	53.78	34.43	15.97	2.31	0.67	3.77	3.18	1.02		
Mansfield OH MSA AA	790	11.82	2.54	8.10	15.93	20.76	53.51	48.10	28.02	23.04	23.85	26.83	32.17	24.34	20.13		
Ohio Non-MSA 15-county AA	2,529	37.84	0.24	0.00	10.25	7.67	77.73	82.84	11.78	9.49	15.39	0.00	14.45	16.56	13.75		
Springfield OH MSA AA	734	10.98	2.31	2.72	14.89	15.67	55.20	53.54	27.60	28.07	20.47	29.03	26.51	21.57	17.44		

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: PARK NB 2010-2011				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography *				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans						
Multistate Full Review:																
Cincinnati MSA 5-county AA	2	0.15	1.13	0.00	11.45	0.00	55.86	100.00	31.46	0.00	1.08	0.00	0.00	1.56	0.00	
Ohio Full Review:																
Columbus OH MSA 6-county AA 2010-2011	180	13.10	1.48	0.00	11.97	21.11	58.28	74.44	28.27	4.44	36.18	0.00	59.38	37.93	10.26	
Ohio Limited Review:																
Dayton OH MSA 3-county AA	97	7.06	0.60	0.00	9.67	6.19	65.66	86.60	24.06	7.22	31.98	0.00	40.00	34.06	20.69	
Mansfield OH MSA AA	27	1.97	0.60	0.00	3.02	0.00	69.56	88.89	26.81	11.11	53.13	0.00	0.00	60.87	37.50	
Ohio Non-MSA 15-county AA	862	62.74	0.02	0.00	2.70	1.16	81.94	77.38	15.34	21.46	57.82	0.00	55.56	54.14	81.90	
Springfield OH MSA AA	206	14.99	0.95	0.00	3.80	0.00	48.96	38.83	46.30	61.17	69.08	0.00	0.00	60.29	76.19	

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: PARK NB 2010-2011						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families 3	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Multistate Full Review:															
Cincinnati MSA 5-county AA	115	4.68	18.71	11.30	17.93	24.35	22.68	21.74	40.69	42.61	0.37	0.26	0.35	0.38	0.44
Ohio Full Review:															
Columbus OH MSA 6-county AA 2010-2011	764	31.08	19.50	19.35	18.46	25.04	22.99	25.32	39.05	30.30	1.97	2.96	2.15	1.94	1.59
Ohio Limited Review:															
Dayton OH MSA 3-county AA	145	5.90	19.26	16.54	18.66	23.31	22.62	26.32	39.46	33.83	0.80	0.41	0.75	1.09	0.79
Mansfield OH MSA AA	167	6.79	17.95	10.83	19.32	29.94	23.37	27.39	39.36	31.85	8.79	7.69	8.10	10.95	8.30
Ohio Non-MSA 15-county AA	1,141	46.42	17.64	11.48	19.46	26.19	24.79	22.11	38.10	40.23	11.10	8.26	8.88	9.20	16.03
Springfield OH MSA AA	126	5.13	18.75	11.86	18.55	33.05	24.25	23.73	38.44	31.36	5.46	3.45	6.18	5.42	6.05

* Based on 2011 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 7.2% of loans originated and purchased by bank.

3 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: PARK NB 2010-2011				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share *				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Families ***	% BANK Loans ****	% Families 4	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****						
Multistate Full Review:																
Cincinnati MSA 5-county AA	28	2.90	18.71	10.71	17.93	32.14	22.68	17.86	40.69	39.29	1.91	1.22	2.69	1.55	1.93	
Ohio Full Review:																
Columbus OH MSA 6-county AA 2010-2011	293	30.36	19.50	25.18	18.46	25.54	22.99	21.22	39.05	28.06	15.82	28.57	17.90	16.89	10.81	
Ohio Limited Review:																
Dayton OH MSA 3-county AA	49	5.08	19.26	17.78	18.66	22.22	22.62	22.22	39.46	37.78	6.33	10.67	5.88	3.97	6.77	
Mansfield OH MSA AA	75	7.77	17.95	19.44	19.32	29.17	23.37	22.22	39.36	29.17	31.69	57.14	30.00	31.43	26.42	
Ohio Non-MSA 15-county AA	397	41.14	17.64	13.39	19.46	21.00	24.79	25.72	38.10	39.90	36.12	39.44	28.83	32.78	42.45	
Springfield OH MSA AA	123	12.75	18.75	18.64	18.55	30.51	24.25	29.66	38.44	21.19	34.97	39.13	44.00	34.04	26.98	

* Based on 2011 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.5% of loans originated and purchased by bank.

4 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: PARK NB 2010-2011					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families 5	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Multistate Full Review:															
Cincinnati MSA 5-county AA	335	5.29	18.71	9.73	17.93	19.76	22.68	24.92	40.69	45.59	0.33	0.64	0.39	0.33	0.27
Ohio Full Review:															
Columbus OH MSA 6-county AA 2010-2011	2,326	36.73	19.50	11.78	18.46	20.33	22.99	25.65	39.05	42.25	2.36	5.31	3.02	2.54	1.86
Limited Review:															
Dayton OH MSA 3-county AA	468	7.39	19.26	11.75	18.66	21.95	22.62	21.73	39.46	44.57	1.16	2.10	1.47	0.85	1.08
Mansfield OH MSA AA	416	6.57	17.95	11.22	19.32	22.69	23.37	26.93	39.36	39.15	10.51	12.38	12.36	10.37	9.32
Ohio Non-MSA 15-county AA	2,540	40.11	17.64	6.17	19.46	18.75	24.79	25.21	38.10	49.88	14.04	12.30	13.69	13.33	14.83
Springfield OH MSA AA	248	3.92	18.75	10.62	18.55	18.14	24.25	27.43	38.44	43.81	6.93	13.11	8.20	5.47	6.46

* Based on 2011 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.9% of loans originated and purchased by bank.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: PARK NB 2010-2011		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total **	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Multistate Full Review:									
Cincinnati MMSA 5-county AA	288	4.31	65.26	55.90	38.54	29.17	32.29	0.55	0.75
Ohio Full Review:									
Columbus OH MSA 6-county AA 2010-2011	1,866	27.92	63.28	64.79	63.61	19.29	17.10	3.41	6.46
Limited Review:									
Dayton OH MSA 3-county AA	476	7.12	68.38	64.50	61.34	19.54	19.12	2.31	3.92
Mansfield OH MSA AA	790	11.82	65.68	63.29	71.01	15.95	13.04	23.85	39.76
Ohio Non-MSA 15-county AA	2,529	37.84	69.94	68.45	74.02	13.88	12.10	15.39	24.97
Springfield OH MSA AA	734	10.98	69.58	64.99	68.66	15.80	15.53	20.47	28.79

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5.22% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: PARK NB 2010-2011			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total **	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Multistate Full Review:									
Cincinnati MMSA 5-county AA	2	0.15	97.46	100.00	100.00	0.00	0.00	1.08	1.64
Ohio Full Review:									
Columbus OH MSA 6-county AA 2010-2011	180	13.10	97.24	87.78	75.56	13.33	11.11	36.18	43.26
Limited Review:									
Dayton OH MSA 3-county AA	97	7.06	98.01	82.47	79.38	13.40	7.22	31.98	33.85
Mansfield OH MSA AA	27	1.97	98.99	96.30	85.19	11.11	3.70	53.13	66.67
Ohio Non-MSA 15-county AA	862	62.74	98.79	91.76	76.57	17.05	6.38	57.82	65.02
Springfield OH MSA AA	206	14.99	98.67	89.81	73.79	17.48	8.74	69.08	76.86

* Based on 2011 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.82% of small loans to farms originated and purchased by the bank.

Table 14 Qualified Investments

QUALIFIED INVESTMENTS		Geography: PARK NATIONAL BANK				Evaluation Period: JANUARY 1, 2010 TO SEPTEMBER 30, 2013			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Multistate Full Review:									
Cincinnati (OH-KY-IN) MMSA	9	919	10	5,668	19	6,587	19.63	0	0
Ohio Full Review:									
Columbus, OH MSA AA	9	1,734	41	11,494	50	13,228	39.42	0	0
Ohio Limited Review:									
Dayton MSA AA	9	737	3	4,525	12	5,262	15.68	0	0
Mansfield MSA AA	9	165	8	1,025	17	1,190	3.56	0	0
Ohio Non-MSA AA	9	797	14	4,945	23	5,742	17.11	0	0
Springfield MSA AA	9	212	6	1,330	15	1,542	4.60	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: THE PARK NATIONAL BANK				Evaluation Period: January 1, 2010 To September 30, 2013									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Multistate Full Review:																	
Cincinnati (OH-KY-IN) MMSA	100.00	10	100.00	0.00	20.00	60.00	20.00	0	1	0	0	0	-1	6.97	17.93	45.54	29.44
Ohio Full Review:																	
Columbus MSA AA	41.11	32	29.09	3.13	15.63	53.13	28.13	0	1	0	-1	0	0	6.87	23.36	41.09	28.68
Ohio Limited Review:																	
Dayton MSA AA	6.37	9	8.19	0.00	44.44	55.56	0.00	0	0	0	0	0	0	3.49	22.91	46.40	27.20
Mansfield MSA AA	9.84	13	11.82	0.00	30.77	53.85	15.38	0	0	0	0	0	0	2.08	17.95	56.06	23.91
Ohio Non-MSA AA	33.42	45	40.90	0.00	11.11	73.33	15.56	1	2	0	0	0	-1	0.37	10.67	77.73	11.24
Springfield MSA AA	9.26	11	10.00	9.09	9.09	72.73	9.09	0	0	0	0	0	0	3.37	15.18	57.07	24.38