



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Public Disclosure

July 1, 2005

**Community Reinvestment Act
Performance Evaluation**

Park National Bank and Trust of Chicago

Charter Number 14649

**2958 Milwaukee Ave
Chicago, IL 60618**

Office of the Comptroller of the Currency

**Mid-size Banks
440 South LaSalle Street 2700
Chicago, IL 60605**

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 **Park National Bank and Trust of Chicago (Park)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Park National Bank and Trust of Chicago Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	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:

- The bank’s lending levels reflect good responsiveness relative to area credit needs and the bank’s deposit market share.
- The overall geographic distribution of loans by income level of the geography is excellent.
- The overall distribution of home mortgage loans to borrowers of different income levels and to small businesses is adequate.
- Community development lending is excellent, which had a positive impact on the Lending Test rating.
- Park has a good level of qualified community development investments that are responsive to the small business, affordable housing, and community service needs in its assessment area.
- Park’s offices are accessible to geographies and individuals of different income levels. Services offered do not vary significantly by location. Hours of operation are excellent and allow convenient access to all individuals in the community.
- Park provides a high level of community development services that are responsive and supportive of the community development needs of its assessment area.

• Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

Park National Bank and Trust of Chicago (Park) is a \$282 million intrastate financial institution headquartered in Chicago, Illinois. The bank, now a wholly owned subsidiary of First Bank of Oak Park Corporation (FBOP), was acquired by FBOP in April 2003. FBOP is a multi-bank holding company, which is headquartered in Oak Park, Illinois, and owns twelve financial institutions in Illinois, California, Texas, and Arizona.

The bank has two banking offices—the main office in Chicago and the Maywood branch that it purchased in November 2003. Park has one assessment area (AA), the Chicago MD. Further details of the bank's AA are discussed later in this evaluation.

Park is a full-service banking institution which offers a full range of commercial, real estate, and consumer credit products. However, its main focus is commercial real estate lending. Although Park extends home equity loans, its affiliate bank Regency Savings Bank underwrites, processes, and books all of the other residential real estate loan products. Net loans and leases represent 71% of the bank's total assets. On May 31, 2005, the bank's \$209 million loan portfolio consisted of 74% commercial real estate loans, 9% multi-family real estate loans, 7% 1-4 family residential real estate, 6% construction and development real estate, and 4% commercial loans. The bank's net Tier 1 capital totaled \$31 million on May 31, 2005, with a loan-to-deposit ratio of 84%.

There are no financial factors impeding the bank's ability to help meet the credit needs of its AAs. However, Park is a small institution that operates in a highly competitive market with branches of significantly larger financial institutions.

The Office of the Comptroller of the Currency last evaluated Park's CRA performance using small bank CRA examination procedures on February 20, 2001. The bank received an overall rating of "Satisfactory" at that evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation of lending products included small business, home purchase, home refinance, home improvement, multi-family, and community development loans. We did not evaluate small farm loans, as this is not an identified credit need and is not a loan product offered by the bank. The evaluation period for the Lending Test (including community development loans) was from January 1, 2000, through December 31, 2004. The evaluation period for the previous examination reviewed loans through December 31, 1999. As the bank's primary emphasis is commercial real estate lending, we placed more weight on small loans to businesses. However, we also considered the bank's home mortgage lending. Within home mortgage lending, we placed the most weight on home improvement and home refinance lending. Home purchase lending is negligible; the bank originated or extended only 31 home purchase loans during the entire review period. In addition, we placed more weight on 2000-2002 and 2003 lending since the bulk of the loans were originated or purchased during this period of time.

The Investment Test included a review of investments and donations that benefited the bank's AA and that meet the definition of community development investments. The Service Test included a review of retail and community development services provided in the bank's AA. The evaluation period for community development investments and services was from January 1, 2000, through June 30, 2005.

Data Integrity

During March 2005, the OCC performed a data integrity examination to determine the accuracy of the bank's Home Mortgage Disclosure Act (HMDA) loans and CRA loans (small loans to businesses). The examination revealed that bank-reported 2000, 2002, and 2003 HMDA data and 2000, 2001, 2003, and 2004 CRA data contained significant errors. A follow-up examination indicated the errors have been corrected. Consequently, the revised data used in this evaluation is accurate. The OCC also reviewed the bank's community development loans, qualified investments and community development services to ensure each activity has community development as its primary purpose.

Selection of Areas for Full-Scope Review

We performed a full-scope evaluation of the Chicago MD.

Other

We conducted a community contact with one organization and reviewed five other contacts. Affordable housing, rehabilitation, and small business lending were identified as credit needs in the community. The need for affordable checking account products was also mentioned by the community organizations.

Fair Lending Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "High Satisfactory". Based on a full-scope review of the bank's assessment area, the bank's lending performance is good. The key findings that support this rating include the following:

- Park originated or purchased a good number and dollar volume of small loans to businesses; an adequate number and dollar volume of home mortgage loans; and an excellent number and dollar volume of community development loans within the Chicago MD.
- The overall geographic distribution of home mortgage loans and small loans to businesses in low- and moderate-income geographies in the bank's AA is excellent.
- The overall distribution of home mortgage loans to low- and moderate-income borrowers and small loans to businesses is adequate.
- Community development lending is excellent, which positively impacted the Lending Test rating.

Lending Activity

Refer to Tables 1—Lending Volume and Other—in appendix C for the facts and data used to evaluate the bank's lending activity.

The bank's lending levels reflect good responsiveness relative to area credit needs and the bank's deposit market share, particularly considering that Park is a small bank that competes for both deposits and loans in a market dominated by significantly larger banks. FDIC deposit market share data as of June 30, 2004, indicates that in the Chicago MD, Park ranked 171st with a deposit market share of 0.08%.

Business lending activity compares favorably with the bank's deposit market share and is good. The bank ranked 132nd with 0.03% of the market share in 2003 (the most recent data available). During the five-year evaluation period the bank granted businesses 265 small loans totaling \$42 million. Park also granted an additional 30 small loans to businesses totaling \$6 million, which are not reportable as small business loans because they are secured by residential real estate.

Home mortgage lending activity is adequate as Park originated or purchased 203 home mortgage loans totaling \$25 million. In 2003, the bank ranked 464th with a 0.01% market share.

Park focuses on large real estate construction loans. The bank indicated that 65% of the number and 35% of the dollar amount of loans originated or purchased by Park during the five-year evaluation period were reportable. Participations in large dollar loans purchased from affiliated banks also represent a large volume of Park's loan portfolio. During 2004 the bank purchased participations in 26 loans for a total of \$63 million.

Distribution of Loans by Income Level of the Geography

Park's geographic distribution of home mortgage loans and small loans to businesses is excellent.

Home Mortgage Loans

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

Overall, the geographic distribution of home mortgage loans in low- and moderate-income census tracts in the Chicago MD is excellent. This is based primarily on the distribution of home improvement and home refinance loans as the bank did not originate or purchase a significant number of home purchase loans. The bank's market share for both home mortgage loans and small loans to businesses is significantly below 1% and is not meaningful. Market share data for home mortgage loans is only available for 2003. Market share data for small loans to businesses is available for both 2002 and 2003. 2004 market share data is not yet available.

The geographic distribution of home purchase loans is excellent, based primarily on 2000-2002 data. In 2000-2002, the bank extended a total of 25 home purchase loans. The portion of these loans extended during this review period in both low- and moderate-income census tracts exceeds the portion of owner-occupied units in these geographies and is excellent. In 2003 and 2004, the bank extended a total of six loans for both years combined; therefore, an analysis of this data is not meaningful. The bank did not have a measurable market share for home purchase loans in any year.

The geographic distribution of home improvement loans is excellent. The portion of home improvement lending in low-income census tracts in 2000-2002 and 2004 exceeded the portion of owner-occupied units in these tracts. In 2003, the portion of lending is close to the demographics. The portion of lending in moderate-income census tracts significantly exceeds the demographics in every year. 2003 market share data indicates that the bank's market share in low-income census tracts is below overall market share, but exceeds overall market share in moderate-income census tracts.

The geographic distribution of home refinance loans is excellent. The portion of home refinance lending in low-income census tracts significantly exceeded the demographics in 2000-2002 and was close to the demographics in 2003. The bank did not make any home refinance loans in low-income census tracts in 2004. However, it is important to note that the bank extended only seven loans in 2004. The distribution of home refinance loans in moderate-income census tracts significantly exceeds the demographics in all three of the review periods. Market share data for 2003 was insignificant at 0.01% and 0.02%.

The geographic distribution of multifamily loans is excellent. Park extended a total of 21 multifamily loans during the review period. Although the bank did not make any multifamily loans in low-income census tracts, the portion of multifamily loans in moderate-income census tracts significantly exceeds the demographics for all three review periods. In 2000-2002, the bank extended all eleven multifamily loans in moderate-income census tracts. The 2003 market share data indicates the bank's market share for multifamily loans in moderate-income census tracts exceeds its overall market share.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent. The portion of small loans to businesses made in low-income census tracts significantly exceeds the portion of businesses located in these census tracts for both the 2000-2002 and the 2004 reporting periods. In 2003, the bank did not make any small loans to businesses in low-income census tracts. However, the portion of small loans to businesses in moderate-income census tracts significantly exceeded the demographics not only in 2003, but also in the 2000-2002 and the 2004 reporting periods. The bank's market share for small loans to businesses in LMI geographies exceeds its 2002 and 2003 overall market share.

Lending Gap Analysis

Our geographic distribution analysis included a review for any unexplained lending gaps in the Chicago MD, particularly in LMI areas. We did not identify any unexplained lending gaps.

Inside/Outside Ratio

For the geographic distribution analysis we performed an inside/outside analysis. A majority of the bank's loans, 86%, were originated to borrowers within its AA. By loan type, 82% of small loans to businesses, 80% of home purchase loans, 99% of home improvement loans, and 98% of home refinance loans were originated with the bank's AA. We viewed this as a positive characteristic in our assessment of lending.

Distribution of Loans by Income Level of the Borrower

Park's distribution of loans to borrowers of different income levels and businesses of different sizes is adequate. The bank achieved excellent penetration to LMI home mortgage borrowers and adequate penetration to small business borrowers. Again, the bank's market share for both home mortgage and small loans to businesses is significantly below 1% and is not meaningful. Market share data for home mortgage loans is only available for 2003. Market share data for small loans to businesses is available for both 2002 and 2003.

Home Mortgage Loans

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

Park's distribution of home mortgage loans to borrowers of different income levels is excellent. This is based primarily on the distribution of home improvement and home refinance loans, since home purchase lending is not a significant product.

The bank's distribution of home purchase loans to LMI borrowers is excellent. The portion of home purchase loans to low-income borrowers in 2000-2002 is near to the demographics and is good. The portion of loans to moderate-income borrowers during this same time period exceeds the demographics and is excellent. In 2003, the bank originated or purchased only two mortgage loans and income data was not collected. The 2004 data indicates the bank did not extend any loans to low-income borrowers, but the portion of loans to moderate-income borrowers significantly exceeded the demographics. However, it is important to note that the bank extended only eight home purchase loans in 2004. Due to the low volume of loans, the bank does not have a market share for home purchase loans in any reporting period.

The bank's distribution of home improvement loans to LMI borrowers is excellent. The distribution of home improvement loans to low-income borrowers was well below the demographics for 2000-2002, but significantly above the demographics in 2003 and 2004. The distribution of home improvement loans to moderate-income borrowers was significantly above the demographics for all reporting periods. Park's 2003 market share for home improvement loans to moderate-income borrowers compares favorably to its overall market share. Market share for home improvement loans to low-income borrowers is well above its overall market share.

The distribution of home refinance loans to LMI borrowers is good. Distribution to low-income borrowers is well above the demographics in the 2000-2002 and the 2004 reporting periods. It is well above the demographics for loans to moderate-income borrowers in the 2000-2002 reporting period and below, but still good in 2004. 2003 data is not meaningful since income information is not available for 93% of the home refinance loans originated or purchased that year. The bank does not have a measurable market share for home refinance loans in any reporting period.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes is adequate. The portion of small loans to business with revenues of \$1 million or less is below the demographics for all reporting periods. It was well below for 2003. However, data indicates that income information was not collected on 50% of the loans originated or purchased in 2003, which may have a significant impact on reporting smaller businesses. In 2002, the bank's market share of loans to businesses with revenues under \$1 million was greater than its overall market share. In 2003 the percentages were comparable.

During the review period, the bank also extended 30 real estate secured small loans to businesses. Twelve of the 30 loans were to small businesses (businesses with revenues of \$1 million or less).

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending is excellent, which positively impacted the Lending Test rating. During the evaluation period Park originated 21 loans totaling \$9 million, which helped meet the community development needs of LMI individuals and geographies in the bank's AA. The loans provided 369 affordable multifamily housing units, of which 85% were priced for low-income and 15% for moderate-income tenants. The bank also granted two loans totaling \$1 million for rehabilitation and stabilization activity in LMI tracts and one \$75 thousand loan to an organization that provides community development services to LMI individuals.

The bank originated and purchased an excellent level of community development loans. To put the volume of community development lending into perspective, we compared the bank's community development loans to the bank's Tier 1 Capital. The bank's \$9 million in community development loans represents 29% of Tier 1 Capital.

Product Innovation and Flexibility

This part of the evaluation considers Park's use of innovative or flexible lending practices to address the credit needs of its assessment area. During the evaluation period, the bank offered business loans to graduates of the Child Care Providers In Action program sponsored by the Logan Neighborhood Association. The bank grants unsecured loans to graduates starting up new child care businesses in the assessment area. These businesses are set up to provide affordable childcare for low- and moderate-income working parents. This product is considered innovative because it is a unique credit offering in the bank's AA; and it is flexible because in contrast to the bank's standard start-up business loans, this product does not require any collateral. Since 2000 the bank has originated four loans totaling \$14 thousand.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the Investment Test is good and is rated "High Satisfactory." Park has a significant level of qualified community development investments that helped to address the needs of its AA. In assessing the bank's performance, we considered the bank's

capacity to address community needs as well as the investment opportunities available within the bank's AA. The key findings that support the rating include:

- Park has a good level of qualified investments overall. All investments were made during the current review period.
- Park's qualified investments and grants are responsive to the affordable housing, small business, and community service needs identified in the assessment area.

Performance in the Chicago MD is good. The bank has 81 qualified investments totaling almost \$1.2 million. These investments represent 3.8% of net tier 1 capital. Complex investments include \$437 thousand funded this period in two Small Business Investment Companies (SBICs) that provide loans in a larger regional area including the bank's AA. The bank committed to additional investments of just over a \$1 million in these SBICs. A \$5.5 million loan was recently granted by one of the SBICs to a company in the Chicago MD.

Park invested \$500 thousand in a certificate of deposit with a Chicago Community Development Financial Institution (CDFI). The bank also provided donations of \$242 thousand to 30 organizations in its AA that provide LMI individuals with community development services and affordable housing or provide small business financing.

Although the investments are not innovative, they have been responsive to the small business and economic development needs of the bank's AA, as well as the affordable housing and service needs of LMI individuals in the AA.

SERVICE TEST

The bank's performance under the Service Test is rated "High Satisfactory." Based on our full-scope review, the bank's performance in the Chicago MD is good. The key findings that support the rating include the following:

- The distribution of branches is good. Branches are accessible to low- and moderate-income geographies and individuals of different incomes. Hours of operation are excellent and are designed to meet the needs of the community.
- Park provides a high level of community development services that are responsive and supportive of the community development needs in the assessment area.

Retail Banking Services

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

Park's delivery systems are accessible to geographies and individuals of different income levels in the Chicago MD. Currently Park has two bank offices and three ATMs, all in moderate-income tracts. The bank does not have any bank offices in low-income tracts; however, 2000 U. S. Census data indicates only eight percent of the Chicago MD population resides in these tracts.

Park maintained only the main office in Chicago until November 7, 2003, when the bank purchased an existing bank location in Mayfield, a town close to Chicago. Park has not closed any offices. The bank maintains three ATMs at the bank offices. Each office has a full service ATM and the ATM at the Mayfield branch has 24-hour access. Mayfield also offers a cash dispensing ATM.

Services are similar at the bank offices. The Maywood location does not house any commercial loan officers, although, they are available by appointment. Hours of operation are excellent and allow convenient access to all residents. Lobby and drive-up hours are designed to meet the needs of the community. The main office also offers walk-up teller services on Sunday morning and extended teller services on weekdays.

The bank has a large staff of bilingual employees at the main office to help provide services to its customers. The area surrounding this office has a large concentration of Polish and Hispanic residents. To improve the availability of banking services to LMI individuals, Park accepts Matricula Consular Cards as a primary form of identification for opening new accounts. The bank also offers free checking accounts that are targeted to the banking needs of LMI individuals.

Alternative delivery systems include 24-hour telephone banking and Internet banking services. We did not place any significant weight on these alternative delivery systems, as the bank did not have information available to show whether these services are effective in reaching LMI individuals and geographies.

Community Development Services

Park's performance in providing community development services is good, particularly when considering the size of the bank and the number of employees. The bank provided a high level of community development services.

During this evaluation period the bank provided financial expertise in fourteen activities to twelve organizations. These organizations provide community development services targeted to LMI individuals, lend to small businesses and create permanent jobs for LMI individuals, or assist in providing affordable housing to LMI individuals. Three bank officers are involved on an on-going basis in ten of these organizations and provide financial expertise as board or committee members. They also are involved in fundraising activities and provide instruction to LMI individuals on financial management. The activities respond to the needs of the bank's assessment area.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test: (Includes CD Loans) January 1, 2000 to January 1, 2005 Investment and Service Tests: January 1, 2000 to July 1, 2005	
Financial Institution	Products Reviewed	
Park National Bank and Trust of Chicago (Park) Chicago, Illinois	Small Business Loans, Home Purchase Loans, Home Improvement Loans, Home Refinance Loans, Community Development (CD) Loans, CD Investments, and CD Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Chicago MD #16497	Full Scope	

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

Chicago MD	B-2
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CHICAGO MD

Demographic Information for Full Scope Area: Chicago MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,875	13.01	24.59	35.63	25.87	0.91
Population by Geography	8,272,768	7.64	23.48	39.45	29.42	0.01
Owner-Occupied Housing by Geography	1,920,291	2.49	15.18	45.04	37.29	0.00
Business by Geography	392,012	3.24	13.35	38.85	44.30	0.26
Farms by Geography	7,318	0.85	6.37	53.85	38.88	0.05
Family Distribution by Income Level	2,029,140	20.65	17.56	22.21	39.57	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	775,416	13.89	33.72	38.43	13.95	0.00
Median Family Income		61,182	Median Housing Value		177,789	
HUD Adjusted Median Family Income for 2003		68,700	Unemployment Rate		6.5%	
Households Below Poverty Level		9.67%				

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

Source: 2000 US Census and 2003 HUD updated MFI.

During the 2000, 2001, and 2002 evaluation period the bank's AA was comprised of portions (528 tracts) of Cook, DuPage, and Lake Counties within the Chicago MSA. For the 2003 evaluation period the bank expanded its AA to all of the Chicago MSA. This MSA contained all of Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, and Will Counties. For 2004 the bank adapted its AA to match the U.S Census change to the Chicago MSA as it became the Chicago MD. The Chicago MD contains all of the Chicago MSA counties except for Lake County. The AA does not arbitrarily exclude low- or moderate-income areas.

The bank maintains two banking offices and three ATMS in this AA. As of June 30, 2004, Park ranked 171st with .08% deposit market share in the Chicago MD.

The seasonally adjusted July 2005 unemployment rate for the Chicago MD is 6.5%, 6.0% for the state of Illinois, and 5.0% nationwide.

We conducted a community contact with one organization and reviewed five other contacts.

Affordable housing, rehabilitation, and small business lending were identified as credit needs in the community. The need for affordable checking account products was also mentioned by the community organizations.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

Most of the tables included in this evaluation contain three tables for each area. The 2000, 2001, and 2002 years utilize the 1990 Census data for the bank’s AA, which comprised a portion of the Chicago MSA. 2003 utilizes the 2000 Census data based on the Chicago MSA and the 2004, utilizes the 2000 Census data for the Chicago MD.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank 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** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area. Table not included.
- 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 not included.

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 not included.

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. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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.

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Table 1. Lending Volume

LENDING VOLUME		Geography: CHICAGO MD						Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004				
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Reported Loans		% of Rated Area Deposits in MA/AA****
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Chicago MD - Full Review:												
2000- 2002	100.00	68	15,891	172	23,282	0	0	13	6,046	253	45,219	100.00
2003	100.00	96	4,516	52	9,565	0	0	4	1,465	148	14,081	100.00
2004	100.00	39	4,378	41	9,491	0	0	4	1,483	84	13,869	100.00

* Rated area refers to either state or multi-state MA rating area as appropriate.

**** Deposit Data as of August 3, 2005.

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Table 1. Other Products

LENDING VOLUME		Geography: CHICAGO MD						Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004						% of Rated Area Deposits in AA****
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Chicago MD - Full Review:														
2000-2002	100.00	17	1,949	17	1,949	0	0	0	0	0	0	0	0	100.00
2003	100.00	2	150	2	150	0	0	0	0	0	0	0	0	100.00
2004	100.00	11	3,604	11	3,604	0	0	0	0	0	0	0	0	100.00

* Rated area refers to either state or multi-state MA rating area as appropriate.

**** Deposit Data as of August 3, 2005

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Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CHICAGO MD					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Chicago MD - Full Review:																
2000 – 2002	25	100.00	3.40	4.00	14.81	32.00	41.32	44.00	40.47	20.00	0.00	0.00	0.00	0.00	0.00	
2003	2	100.00	2.49	0.00	15.18	50.00	45.04	50.00	37.29	0.00	0.00	0.00	0.00	0.00	0.00	
2004	4	100.00	2.59	0.00	15.03	50.00	45.23	25.00	37.15	25.00	NA	NA	NA	NA	NA	

* Based on 2002 Peer Mortgage Data for the 2000 – 2002 period and 2003 Peer Mortgage Data for the 2003 period. 2004 Peer Mortgage Data is not available for the 2004 period.

*** 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 1990 Census information for the 2000 – 2002 period. For the 2003 and 2004 periods this data is based on the 2000 Census information.

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CHICAGO MD				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004									
MA/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
Chicago MD - Full Review:															
2000 – 2002	15	100.00	3.40	6.67	14.81	53.33	41.32	20.00	40.47	20.00	0.00	0.00	0.00	0.00	0.00
2003	47	100.00	2.49	2.13	15.18	44.68	45.04	46.81	37.29	6.38	0.27	0.14	0.64	0.28	0.06
2004	23	100.00	2.59	4.35	15.03	60.87	45.23	30.43	37.15	4.35	NA	NA	NA	NA	NA

* Based on 2002 Peer Mortgage Data for the 2000 – 2002 period and 2003 Peer Mortgage Data for the 2003 period. 2004 Peer Mortgage Data is not available for the 2004 period.

*** 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 1990 Census information for the 2000 – 2002 period. For the 2003 and 2004 periods this data is based on the 2000 Census information.

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Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: CHICAGO MD					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004					Market Share (%) by Geography *				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Chicago MD - Full Review:																
2000 – 2002	17	100.00	3.40	11.76	14.81	35.29	41.32	35.29	40.47	17.65	0.00	0.00	0.00	0.00	0.00	
2003	42	100.00	2.49	2.38	15.18	33.33	45.04	64.29	37.29	0.00	0.01	0.01	0.02	0.01	0.00	
2004	7	100.00	2.59	0.00	15.03	71.42	45.23	14.29	37.15	14.29	NA	NA	NA	NA	NA	

* Based on 2002 Peer Mortgage Data for the 2000 – 2002 period and 2003 Peer Mortgage Data for the 2003 period. 2004 Peer Mortgage Data is not available for the 2004 period.
 *** 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 1990 Census information for the 2000 – 2002 period. For the 2003 and 2004 periods this data is based on the 2000 Census information.

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Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CHICAGO MD						Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Chicago MD - Full Review:															
2000 – 2002	11	100.00	13.36	0.00	25.39	100.00	31.81	0.00	29.45	0.00	0.00	0.00	0.00	0.00	0.00
2003	5	100.00	11.86	0.00	24.62	60.00	36.16	40.00	27.36	0.00	0.17	0.00	0.25	0.17	0.00
2004	5	100.00	12.02	0.00	24.02	40.00	35.72	20.00	28.23	20.00	NA	NA	NA	NA	NA

*Based on 2002 Peer Mortgage Data for the 2000 – 2002 period and 2003 Peer Mortgage Data for the 2003 period. 2004 Peer Mortgage Data is not available for the 2004 period.

**Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 1990 Census information for the 2000 – 2002 period. For the 2003 and 2004 periods this data is based on the 2000 Census information.

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Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: CHICAGO MD															
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004															
MA/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	Overall	Low	Mod	Mid	Upp
Chicago MD - Full Review:															
2000 – 2002	172	100.00	6.43	12.21	16.85	34.88	39.05	38.37	37.26	14.53	0.03	0.09	0.12	0.03	0.01
2003	49	100.00	3.24	0.00	13.35	42.86	38.85	42.86	44.30	14.29	0.03	0.04	0.10	0.03	0.01
2004	40	100.00	3.40	7.50	13.49	45.00	38.92	42.50	43.90	5.00	NA	NA	NA	NA	NA

^{*} Based on 2002 Peer Small Business Data for the 2000 – 2002 period and 2003 data for the 2003 period. 2004 data is not available for the 2004 period.

^{***} Source Data - Dun and Bradstreet.

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Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CHICAGO MD					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004					Market Share [*]				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Chicago MD - Full Review:																
2000 – 2002	25	100.00	22.11	18.18	17.61	22.73	22.26	13.64	38.03	45.45	0.00	0.00	0.00	0.00	0.00	
2003	2	100.00	20.65	0.00	17.56	0.00	22.21	0.00	39.57	0.00	0.00	0.00	0.00	0.00	0.00	
2004	8	100.00	21.32	0.00	17.88	33.33	22.37	33.33	38.43	33.33	NA	NA	NA	NA	NA	

^{*}Based on 2002 Peer Mortgage Data for the 2000 – 2002 period and 2003 Peer Mortgage Data for the 2003 period. 2004 Peer Mortgage Data is not available for the 2004 period.

^{**}As a percentage of loans with borrower income information available. No information was available for 12.0% of loans originated and purchased by bank for the 2000 – 2002 period. For the 2003 period no information was available for 100% of loans originated and purchased by bank. No information was available for 25% of loans originated and purchased by the bank for the 2004 period.

^{**}Percentage of Families is based on the 1990 Census information for the 2000 – 2002 period. For the 2003 and 2004 periods the percentage of Families is based on the 2000 Census information.

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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CHICAGO MD				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004					Market Share [*]				
MA/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 ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}					
Chicago MD - Full Review:															
2000 – 2002	15	100.00	22.11	8.33	17.61	58.33	22.26	16.67	38.03	16.67	0.00	0.00	0.00	0.00	0.00
2003	47	100.00	20.65	50.00	17.56	25.00	22.21	0.00	39.57	25.00	0.06	0.22	0.06	0.02	0.04
2004	23	100.00	21.32	28.57	17.88	33.33	22.37	28.57	38.43	9.52	NA	NA	NA	NA	NA

^{*} Based on 2002 Peer Mortgage Data for the 2000 – 2002 period and 2003 Peer Mortgage Data for the 2003 period. 2004 Peer Mortgage Data is not available for the 2004 period.

^{**} As a percentage of loans with borrower income information available. No information was available for 20.0% of loans originated and purchased by bank for the 2000 – 2002 period. No information was available for 83% of the loans originated and purchased by bank for the 2003 period. No information was available for 8.7% of loans originated and purchased by bank for the 2004 period.

^{***} -Percentage of Families is based on the 1990 Census information for the 2000 – 2002 period. For the 2003 and 2004 periods the percentage of Families is based on the 2000 Census information.

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: CHICAGO MD					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004					Market Share [*]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Chicago MD - Full Review:																
2000 – 2002	17	100.00	22.11	31.25	17.61	25.00	22.26	31.25	38.03	12.50	0.00	0.00	0.00	0.00	0.00	
2003	42	100.00	20.65	0.00	17.56	0.00	22.21	66.67	39.57	33.33	0.00	0.00	0.00	0.00	0.00	
2004	8	100.00	21.32	28.57	17.88	14.29	22.37	28.57	38.43	28.57	NA	NA	NA	NA	NA	

^{*} Based on 2002 Peer Mortgage Data for the 2000 – 2002 period and 2003 Peer Mortgage Data for the 2003 period. 2004 Peer Mortgage Data is not available for the 2004 period.

^{**} As a percentage of loans with borrower income information available. No information was available for 5.9% of loans originated and purchased by bank for the 2000 – 2002 period. For the 2003 period no information was available for 92.9% of the loans originated and purchased by the bank.

^{***} Percentage of Families is based on the 1990 Census information for the 2000 – 2002 period. For the 2003 and 2004 periods the percentage of Families is based on the 2000 Census information.

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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CHICAGO MSA			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2004				
MA/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
Chicago MD - Full Review:									
2000 – 2002	172	100.00	74.10	40.70	59.88	27.91	12.21	0.03	0.08
2003	52	100.00	63.41	15.38	36.54	44.23	19.23	0.03	0.03
2004	41	100.00	63.66	41.46	51.22	17.07	31.71	NA	NA

* Based on 2002 Peer Small Business Data for the 2000 – 2002 period and 2003 data for the 2003 period. 2004 data is not available for the 2004 period.

** 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)

**** 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 4.07% of small loans to businesses originated and purchased by the bank for the 2000 – 2002 period. No information was available for 50.00% of small loans to businesses originated and purchased by the bank for 2003. No information was available for 2.44% of small loans to businesses originated and purchased for the 2004 period.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CHICAGO MA				Evaluation Period: JANUARY 1, 2000 TO June 30, 2005			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Chicago MD - Full Review:									
2000 – 2005	0	0	81	1,179	81	1,179	100.00	2	1,063

* 'Prior Period Investments' means investments made in a previous 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.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: CHICAGO MD																	
Evaluation Period: JANUARY 1, 2000 TO JUNE 30, 2005																	
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
Chicago MD - Full Review:																	
2000 - 2002	100.00	1	100.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	11.42	24.98	34.82	28.77
2003	100.00	2	100.00	0.00	100.00	0.00	0.00	1	0	0	+1	0	0	7.64	23.48	39.45	29.42
2004 - 2005	100.00	2	100.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	8.00	23.35	39.50	29.15