



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

August 28, 2006

Community Reinvestment Act Performance Evaluation

The Park National Bank
Charter Number: 9179

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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** with respect to the Lending, Investment, and Service Tests:

| Performance Levels | (Name of Depository Institution) 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:

- Lending levels reflect good responsiveness by The Park National Bank (PNB) to the credit needs of its full-scope Assessment Area (AA).
- The geographic distribution of PNB’s home mortgage loans and small loans to businesses and farms was good in the full-scope AA.
- The borrower distribution of PNB’s home mortgage loans was excellent and of small loans to businesses and farms was adequate in the full-scope AA.
- A substantial majority of the home mortgage loans and small loans to businesses and farms were originated within PNB’s AAs.
- The bank’s level of community development (CD) lending was good.
- PNB demonstrated an excellent level of qualified CD investments.
- The bank’s service delivery systems were accessible to geographies and individuals of different income levels in the AA. Hours and services did not vary in a way that inconvenienced the AA, in particular low- and moderate-income geographies or individuals.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. 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.

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

Community Development (CD) - Affordable housing 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.

Full-Scope Review - Performance under the Lending, Investment, and Service tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the U.S. 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

Limited-Scope 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, branch distribution).

Low-Income - Income levels that are less than 50 percent of the median family income.

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 Statistical Area (MSA) - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80 percent and less than 120 percent of the MFI.

Moderate-Income - Income levels that are at least 50 percent and less than 80 percent of the MFI.

Small Loans to Businesses - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Loans to Farms - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 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 - Income levels that are 120 percent or more of the MFI.

Description of Institution

The Park National Bank (PNB) is an intrastate bank based in Newark, Ohio. As of June 30, 2006, PNB's total assets were \$2.0 billion. The bank operates primarily in central Ohio. PNB also has branches in Columbus and southwestern Ohio, including Dayton, and Cincinnati.

PNB's base counties, Licking and Fairfield, are located immediately east and southeast of Columbus, Ohio, and are included in the Columbus MSA. The bank's focus of operations in Licking and Fairfield counties is traditional business and consumer lending and deposit services. The primary focus of operations in Columbus, Dayton, and Cincinnati is more targeted to business lending. This arrangement presents specific analytical challenges of the bank's performance, as discussed under the Lending Test section of this evaluation.

PNB is a wholly owned subsidiary of Park National Corporation (PRK), a multi-bank holding company based in Newark, Ohio. PRK also owns seven other banks that operate in Ohio: Century National Bank, Zanesville; The Citizens National Bank, Urbana; First-Knox National Bank, Mt. Vernon; The Richland Trust Company, Mansfield; Second National Bank, Greenville; Security National Bank, Springfield; and United Bank, N.A., Bucyrus. On January 1, 2005, PNB acquired the First Clermont Bank (First) in Clermont County. Total assets of First on the date of acquisition were \$237 million. First is located in Southwestern Ohio, in the Cincinnati MSA. The bank had seven offices, all in Clermont County. Combined total assets for PRK as of December 31, 2005, were \$5.4 billion. PRK also administers the Park National Corporation Foundation. This foundation distributes charitable grants and donations to various organizations. PRK makes CD investments, which it allocates on a pro rata basis to its affiliate banks. The CD investments allocated to PNB by PRK were considered in this evaluation of PNB's CRA performance.

A full range of credit products, depository accounts, trust services, and retail non-deposit investment services are offered throughout the bank's 40 offices. However, as mentioned above, PNB's limited presence in the cities of Columbus, Dayton, and Cincinnati is primarily designed for business loan generation, although all services are available.

PNB has a well-balanced loan portfolio providing credit services to commercial, real estate, and consumer borrowers. At June 30, 2006, net loans totaled \$1.2 billion or 60 percent of total assets. The bank's loan-to-deposit ratio was 87%. PNB's loan portfolio was comprised of real estate, commercial, and consumer loans. Loans secured by real estate were 70% of gross loans, consumer loans 12%, commercial purpose loans 15%, and other purpose loans 3%.

As of June 30, 2006, the bank's Tier 1 capital was \$123 million. Based on PNB's financial condition, size, product offerings, and branch/ATM configuration, no legal or financial impediments exist that would inhibit its ability to meet the AAs' credit needs.

The last CRA Public Evaluation was dated June 3, 2002, when the bank was rated "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

We reviewed home mortgage loans and small business and small farm loans for the period of January 1, 2002, through June 30, 2006. The evaluation period for CD loans, the Investment Test, and the Service Test, was June 4, 2002, to August 28, 2006. In the evaluation of PNB's performance, the activities of First, which was acquired January 1, 2005, were considered from that date forward.

CD loans, investments, and services submitted by PNB's management were verified to ensure they met the regulatory definition of CD.

For analysis purposes, the Columbus MSA AA #18140 represents the bank's primary lending area. This MSA also contains the bank's headquarters office and the majority of its branches. We conducted a full-scope review of the Columbus MSA AA and limited reviews of the Dayton MSA AA #19380, and the Cincinnati MSA AA #17140. A brief summary of key demographic data for the AAs is provided in appendix A.

Data Integrity

This evaluation was based on accurate loan, investment, and CD services data. We tested a representative sample of PNB's 2002, 2003, 2004, 2005, and 2006 publicly filed information on home mortgage loans and small loans to businesses and farms for accuracy. We found the bank's reporting of all loans to be reliable.

Selection of Areas for Full-Scope Review

PNB has three AAs located in the state of Ohio. Each AA consists of one or more counties within an MSA. The majority of the bank's lending, service, and investments occur in Delaware, Licking, Fairfield, and Franklin Counties in the Columbus MSA, #18140 and includes all geographies in all of those counties. Delaware County was only added to the AA in July 2004 when a new branch was opened. This AA is the most significant AA in term of loans (90%), deposits (89%), and branches (75%). This four-county AA received a full-scope review. Within this AA, the majority of the bank's lending activity (87%), deposit activity (95%), and branch locations (80%) were in Licking and Fairfield Counties. The bank has expanded its presence in Franklin County from one to five offices; however, this represents only 1.6% of total banking offices in Franklin County per the FDIC's June 2005, branch summary report. PNB's focus in Franklin County remains small business lending; but other types of loans and services have been generated with the additional offices. The 1990 census is used to compare performance to demographic targets for the bank's 2002 loan data, the 2000 census is used to measure the performance in 2003. The 2000 census with revised MSA definitions was used for the 2004, 2005, and 2006 analysis. This performance evaluation contains tables which compare performance in each of these three census periods located after the narrative section of the evaluation.

Ratings

The bank's overall rating was based on the area that received a full-scope review. The Lending Test was weighted more heavily in arriving at the overall rating.

Other

Three community contacts were made during the examination. The contacts included two local organizations providing housing assistance, and one statewide developer of low-income multi-family and single family units. The contacts mentioned the difficulty of working, lower income families affording purchase or rehab loans. There is ample affordable housing in the area; however, a large portion is over 50 years old and in need of repair. The contacts also indicated good participation by local banks in CD activities.

Fair Lending Review

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

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 the full-scope review, the bank's performance in the Columbus MSA AA is good.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect good responsiveness by PNB to the credit needs of the full-scope AA.

Approximately 91% of the bank's total loans that were generated over the evaluation period were within the bank's full-scope AA. Fifty-two percent of these loans were home mortgage loans and 48% small loans to businesses and farms. Among the home mortgage loans, approximately 49% were for refinance, 39% for home purchase and 12% for home improvement.

The majority of PNB's operations are centered in two of the four counties in the Columbus MSA AA. These counties, Licking and Fairfield, are much smaller in terms of population than Franklin County. In addition, Franklin County has many more low- (34) and moderate- (79) income census tracts and families than Licking and Fairfield Counties combined (1 low-income; 17 moderate-income census tracts). This disparity among the locations of low- and moderate-income geographies coupled with the branch office distribution presents significant challenges for the bank with respect to serving the low- and moderate-income geographies in this AA. PNB has increased branches in Franklin County from one to five over the past four years; correspondingly, lending to low- and moderate-income geographies and families has improved slightly. PNB has only one branch in Delaware County. Delaware County contains no low-income geographies and one (3%) moderate-income geography.

PNB was ranked fifth in the Columbus MSA AA in terms of deposit market share with 4.46%. Competition comes from several large regional and nation-wide banks. The top two banks capture 50% of this market share. Conversely, in just Fairfield and Licking Counties, PNB ranks first with 38% of that market share. Market share statistics are from FDIC deposit market share reports as of June 30, 2005.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The overall geographic distribution of PNB's home mortgage loans reflects good distribution among low- and moderate-income census tracts in the full scope AA.

HOME PURCHASE LOANS

Geographic distribution of home purchase loans is good. The percentage of loans to moderate-income geographies significantly exceeds the percentage of owner-occupied units. PNB's market share exceeds its overall market share in moderate-income census tracts.

The percentage of loans in low-income geographies is significantly below the percentage of owner-occupied units. PNB's market share in low-income geographies is significantly below the overall market share. As previously discussed, the majority of low- and moderate-income geographies are located in Franklin County. The primary focus of Franklin County offices is small business lending, although with the expansion of the branch network in recent years, home mortgage lending in low-income geographies increased by 65%. Banking offices that focus on home purchase lending are located primarily in Licking and Fairfield Counties. The geographic distribution of home purchase loans in low-income geographies in these two counties is excellent.

HOME IMPROVEMENT LOANS

The geographic distribution of home improvement loans is good. The percentage of loans to moderate-income geographies significantly exceeded the percentage of owner-occupied units. The percentage of loans to low-income geographies was significantly below the percentage of owner-occupied units. PNB's market share of loans in low-income geographies was significantly below its overall market share while its market share for loans in moderate-income geographies significantly exceeded its overall market share.

HOME MORTGAGE REFINANCE

The distribution of home mortgage refinance loans among geographies of different income levels is good. For the evaluation period, the percentage of loans to moderate-income geographies is significantly above the percentage of owner-occupied units, while the percentage of loans to low-income geographies was significantly below the percentage of owner-occupied units. Market share for low-income loans is below PNB's overall market

share while market share for moderate-income loans is significantly above overall market share.

MULTI-FAMILY LOANS

Refer to Table 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination of multi-family loans.

The geographic distribution of multifamily loans is good. The percentage of loans in low-income geographies substantially exceeds the percent of multi-family units during the evaluation period. Lending in moderate-income geographies exceeds the percent of multi-family units in moderate-income geographies.

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 percentage of small loans to businesses in low-income geographies exceeds the percentage of small businesses located therein. The percentage of loans in moderate-income geographies greatly exceeds the demographic comparison during the evaluation period. The market share for both low- and moderate- geographies significantly exceeds the bank's overall market share for small loans to businesses.

Small Loans to Farms

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

The geographic distribution of small loans to farms is poor. Farm lending is not a major product for the bank. PNB generated 148 small loans to farms during the evaluation period. The bank did not generate any loans to farms located in low-income geographies. The number of farms located in low-income geographies is very small (1.92% of all farms in 2004). The bank did originate loans to farms in moderate-income geographies; however, this percentage was well below the demographic target.

Lending Gap Analysis

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

Inside/Outside Ratio

A substantial majority (87.4%) of the home mortgage loans, small loans to businesses and small loans to farms that were originated by PNB over the evaluation period were within its AAs. The inside/outside ratio analysis was performed at the bank level and included all

bank originations. This performance was positively factored into the overall analysis of the bank's geographic distribution of lending by income level by geography.

Distribution of Loans by Income Level of the Borrower

Overall borrower distribution is good. The borrower distribution of home mortgage loans is excellent and the distribution of small loans to businesses and farms is adequate. This analysis is based on the bank's lending performance to low- and moderate-income borrowers and businesses and farms with revenues of \$1 million or less.

Home Mortgage Loans

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

The borrower distribution of PNB's home mortgage loans reflects an excellent distribution among low- and moderate-income borrowers.

HOME PURCHASE LOANS

The borrower distribution of home purchase loans is excellent. The percentage of home purchases to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers living in the full-scope AA in the evaluation period. The percent of home purchase loans to low-income borrowers is below the percentage of low-income families living in the full scope AA. A factor contributing to the lower distribution to low-income borrowers is that 10% of the households are below the poverty level and may not meet the criteria to qualify for a home loan. In addition, the weighted average of median housing per the 2000 demographics is \$120,724. PNB's market share to both low- and moderate-income borrowers exceeds its overall market share to all borrowers.

HOME IMPROVEMENT LOANS

Borrower distribution of home improvement loans was excellent. The percentage of home improvement loans to both low- and moderate-income borrowers greatly exceeded the percentage of such families living in the full-scope AA. The bank's market share to both low- and moderate-income borrowers significantly exceeded its overall market share.

HOME MORTGAGE REFINANCE LOANS

The borrower distribution for home mortgage refinance loans is good. The percentage of refinance loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families living in the full-scope AA. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families living in the full-scope AA. A contributing factor to the low penetration to low-income borrowers is that 10% of the households are below the poverty level and may not meet the criteria to qualify for a home loan. The bank's market share for low- and moderate-income borrowers exceeds the bank's overall market share during the evaluation 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 borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses with gross revenue of \$1 million or less is less than the percentage of businesses defined as small. The bank's market share to businesses with \$1 million or less in gross revenue greatly exceeded its market share to businesses regardless of revenue.

Small Loans to Farms

Refer to Table 12 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses. The borrower distribution of small loans to farms is good. The percentage of small loans to farms with \$1 million or less in gross revenue is commensurate to the percentage of farms defined as small in 2002. PNB's market share of loans to small farm exceeds its overall market share to farms regardless of revenue.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

The bank's level of CD lending was good. During the evaluation period, PNB originated 29 CD loans totaling \$9.6 million. Opportunities for CD lending are limited and these loans were responsive to the needs of the AA. In addition, the bank originated five CD loans totaling \$8.1 million outside their AA. These served individuals and geographies in a broader statewide area including the bank's AA. Since the bank has adequately addressed the CD needs of its AA, these CD loans were also counted.

PNB originated eight CD loans with the purpose of redevelopment of housing for low- or moderate-income individuals. The bank originated four loans to an organization assisting persons with alcohol problems, the majority of whom were low- or moderate-income. Four CD loans were originated to an organization which assists with affordable housing for low- and moderate-income families. Six CD loans were originated to an organization which provides educational services to children of low- and moderate-income families.

Positive consideration was given to PNB's CD lending in the evaluation of its lending performance.

Product Innovation and Flexibility

The bank's CD lending programs are not considered innovative; however, several were flexible. CD loans were available on generally standard terms and conditions. The flexible

lending programs were given neutral consideration in the evaluation of the bank's lending performance.

Welcome Home, a program offered through the Federal Home Loan Bank of Cincinnati, provides assistance with down payment and closing costs for low- and moderate-income borrowers. This program began in 2003 and ended in 2006. PNB granted 17 loans totaling \$1.3 million under this program.

Ohio Housing Finance Agency, Revenue Bond Loan Program. These programs offer lower interest rates and closing costs to first time homebuyers. PNB originated 91 loans totaling \$9.5 million under these programs.

PNB also offers FHA home loans and six programs under Freddie Mac. These programs are designed for low- and moderate-income borrowers and provide reduced down payment and loan-to-value options. The bank originated seven loans totaling \$765 thousand under these programs. Small Business Administration (SBA). PNB is an active participant in the SBA's lending programs. During the evaluation period the bank originated 15 loans totaling \$1.7 million in SBA program loans.

Fairfield County Revolving Loan Fund Program. Small businesses may borrow up to \$60 thousand for new buildings, new equipment, and working capital with favorable interest rates. This service is designed to create jobs in Fairfield County. PNB originated five loans totaling \$223 thousand under this program.

Columbus Countrywide Development Corporation (CCDC) and Ohio Statewide Development Corporation (OSDC). PNB offers these business lending programs which provide low-cost, long-term SBA loans to small businesses in Ohio. During the evaluation period the bank granted seven loans totaling \$1.8 million under these programs. A lender employed by the bank was named OSDC lender of the year in 2005 for his active participation in this program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Cincinnati MSA AA and the Dayton MSA AAs was weaker than the bank's overall performance. The bank's presence in the Cincinnati MSA has expanded with the acquisition of the First Clermont Bank (First) in January 2005, and the opening of the West Chester branch (Butler County) in 2005. First added seven offices to the Cincinnati MSA; however, these offices are all located east of Hamilton County, the largest county in this MSA. Butler County was added to the Cincinnati MSA with the 2004 MSA definition revisions. The single Dayton office was moved to a more accessible location in 2005.

The original purpose of the entry into both of these MSAs was small business loans; however, with the addition of First, consumer mortgage lending in the Cincinnati MSA is increasing. PNB's percent of loans in the Cincinnati MSA increased from 1.26% of total loans by number in 2003 to 8.49% in the 2004, 2005, 2006 period. The percent of loans in the Dayton MSA increased from 0.85% in 2003, to 0.92% of total loans by number in the

2004, 2005, 2006 period. Small loans to businesses were below the percent of businesses located in low-income geographies in both time periods, in both MSAs; however, they greatly exceeded the percent of businesses located in moderate-income geographies in both time periods in both MSAs. This did not impact our overall conclusions for the Lending Test because the bank has a very limited presence in these two AAs. Refer to Tables 1 through 11 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 13 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 rated "Outstanding". Based on full-scope reviews, the bank's performance in the Columbus MSA AA is excellent.

PNB recorded 100 investments totaling \$7.7 million in the Columbus MSA AA. Seventy-nine grants and donations included in this number total \$925M. These grants come from PNB and the Park National Corporation Foundation. These investments are well diversified among organizations providing social and housing services to low- and moderate-income individuals.

PRK consistently invests in Ohio Equity Fund limited partnerships. These funds provide equity capital for investments in low-income housing developments throughout Ohio. These funds are administered by the Ohio Capital Corporation for Housing who construct, rehabilitate, and preserve affordable housing in Ohio. PNB's pro-rata share of unfunded commitments to low-income housing projects equals \$9.1 million. The bank's portion of investments in the 13 partnerships totaled \$6.1 million during the evaluation period. Book balances from prior period investments were \$1.6 million.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Dayton MSA AA and the Cincinnati MSA AA is weaker than the bank's overall performance. PNB maintains limited presence in both these limited-scope AAs and focuses the majority of its investments in the full-scope AA. Refer to Table 13 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory." This is based on the bank's performance in the Columbus MSA, which received a full-scope review.

Retail Banking Services

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

PNB's delivery systems are accessible to geographies and individuals of different income levels in the AA. The percentage of the bank's branches located in low-income geographies was below the percentage of the population that resides in those areas. The majority of those low-income geographies are located in Franklin County, where the bank has limited branches (17% of Columbus MSA AA branches are located in Franklin County). The percentage of branches located in moderate-income geographies is nearly equal the percentage of the population living in those areas.

The bank's record of opening and closing branches did not adversely affect the accessibility of its delivery systems in low- and moderate-income geographies or individuals throughout the AA. During the evaluation period the bank opened five new branches, one in a middle-income geography and four in upper-income geographies. The bank did not close any branches during the evaluation period.

PNB's hours and services offered throughout the AA are good. Office hours and services including the availability of loan officers for all loan products, were comparable among locations regardless of the income level of the geography. PNB has Saturday hours at all locations and Sunday hours at nine locations.

The bank's ATM network offers an effective alternative system for delivering retail banking services in low- and moderate-income geographies and to low- and moderate-income individuals. PNB operates 37 ATMs throughout the AA including 2.7% located in low-income geographies and 21.6% in moderate-income geographies. These ATM percentages compare to 31% of the population living in low- and moderate-income geographies in the full-scope AA.

PNB also offers several other alternative delivery systems. These include BankLink, a telephone banking service for businesses; TeleBank, a telephone banking service for individuals; banking services by mail, On-Line banking; and direct deposit services. These delivery services are generally available 24 hours a day, seven days a week without customer fees. BankLink, TeleBank, and On-Line Banking allow customers to check account balances, transfer funds, and make loan payments. The bank also offers a totally free checking account called Free Park. This account requires an opening balance of \$50 and a beginning supply of checks is free. No information was available on the

effectiveness of these services in reaching low- or moderate-income geographies or individuals. Therefore, we did not place significant weight on these alternative delivery systems when drawing conclusions under the Service Test.

Community Development Services

PNB provides a high level of CD services to the AA. This was based primarily on the number of services provided considering the size of the bank and its resources. Bank representatives often serve in leadership roles, including executive officers, board members, finance, and loan committees. The organizations assisted were involved in a variety of CD activities including services targeted to low- and moderate-income individuals, affordable housing, and small businesses. Ninety bank representatives (15% of bank employees) contributed CD services to 32 organizations. In addition, over 200 bank representatives performed services for various charitable and community organizations that did not specifically meet the definition of CD, but deliver valuable and helpful services to the community. In many cases these organizations provided services to low- or moderate-income individuals, or geographies.

Below are examples of CD services bank representatives provided during the evaluation period.

Two bank associates served on the board of a nationwide organization that constructs new housing for low- and moderate-income individuals. Four associates served on the loan review committee for an organization that provides financing for small businesses. Three associates served on the board of a local organization providing housing assistance for low- and moderate-income families, and four associates provide services for an organization that assists low- and moderate-income families with food and clothing. Thirty-eight associates participated as instructors in a program designed to teach financial matters to children. A large number of these courses were conducted in schools located in low- and moderate-income geographies.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Cincinnati MSA AA and the Dayton MSA AA is weaker than the bank's overall performance. This is due to the bank's limited presence in those markets. This did not impact our overall conclusions for the Service Test. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

| | | |
|--|--|--|
| Time Period Reviewed | Lending Test (excludes CD Loans): 01/01/02 to 06/30/06 Investment and Service Tests and CD Loans: (06/04/02 to 08/28/06) | |
| Financial Institution | Products Reviewed | |
| The Park National Bank (PNB) Newark, Ohio | Home mortgage loans, small loans to businesses and farms, community development loans, investments, services | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| Park National Corporation (PRK) | Parent bank holding company | Investments and contributions allocated to The Park National Bank. |
| List of Assessment Areas and Type of Examination | | |
| Assessment Area | Type of Exam | Other Information |
| Columbus MSA #18140 (Delaware, Franklin, Licking, and Fairfield Counties) Cincinnati MSA #17140 (Butler, Clermont, and Hamilton Counties) Dayton MSA # 19380 (Montgomery County) | Full-Scope Limited-scope Limited scope | 91% total loans, 89% of total deposits and 75% of branches. 9 offices, 8.5% of total loans, and 11% of deposits 1 office, .5% of total loans and less than 1% of total deposits. |

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

| | |
|--------------------|-----|
| Columbus MSA | B-2 |
|--------------------|-----|

Institution ID: 9179 - PARK NATIONAL BANK

Columbus MSA AA 2004

| Demographic Information for Full Scope Area: Columbus MSA AA 2004 | | | | | | |
|--|-----------|------------|------------------------------------|---------------|--------------|------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 350 | 10.00 | 27.71 | 36.29 | 26.00 | 0.00 |
| Population by Geography | 1,447,217 | 7.21 | 23.96 | 38.72 | 30.11 | 0.00 |
| Owner-Occupied Housing by Geography | 357,538 | 3.22 | 18.59 | 42.34 | 35.84 | 0.00 |
| Business by Geography | 99,793 | 7.81 | 19.51 | 37.97 | 34.71 | 0.00 |
| Farms by Geography | 2,710 | 1.92 | 12.69 | 54.94 | 30.44 | 0.00 |
| Family Distribution by Income Level | 370,631 | 19.47 | 18.18 | 22.80 | 39.55 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 139,538 | 12.04 | 35.41 | 38.66 | 13.89 | 0.00 |
| Median Family Income | | 54,708 | Median Housing Value | | 120,724 | |
| HUD Adjusted Median Family Income for 2006 | | 64,400 | Unemployment Rate (2000 US Census) | | 2.20% | |
| Households Below Poverty Level | | 10% | | | | |

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2006 HUD updated MFI

PNB's Columbus MSA AA consists of Delaware, Licking, Fairfield, and Franklin Counties. This generally encompasses the north, central, and eastern portion of the MSA. The MSA was altered in 2004 and includes eight counties surrounding Columbus. PNB has 30 offices located throughout this AA, but offices are concentrated in Licking and Fairfield Counties. At June 30, 2005, 89% of PNB's deposits were derived from this AA. Over the evaluation period, 91% of PNB's loans were derived from this AA.

PNB's deposits in the Columbus MSA AA totaled \$1.219 billion based on FDIC market share data as of June 30, 2005. This equates to a 4.46% market share, which ranks PNB as the fifth largest deposit taking institution in the AA. The leading deposit taking institution has a 29.08% market share. The Columbus market is dominated by three financial institutions with a much stronger branch presence and a combined market share of 61.3%. In Fairfield and Licking Counties the bank has a 38.13% market share and ranks first. Primary competitors in the AA are JPMorgan Chase Bank, NA, Huntington National Bank, and National City Bank.

PNB has a total of 30 banking locations in the Columbus AA including five in Franklin County. Additional offices are maintained outside this AA in the Dayton MSA (one) and in the Cincinnati MSA (nine). PNB also provides 37 ATMs in the AA. All deposit and loan products are available at each branch.

Employment is well diversified among the manufacturing, retail, health care and government industries. Major employers are Abbot Laboratories/Ross Products, American Electric Power, State Farm Insurance, the State of Ohio, and Cyril Scott Co. The business climate and economy in this AA is good. Unemployment in Franklin County as of June 6, 2006, was 4.9% compared to statewide unemployment of 5.1% and a national unemployment of 4.8%. Unemployment in Licking and Fairfield Counties is similar at 4.9% and 4.7%, respectively. Delaware County unemployment stood at 3.5%. Community development opportunities are available as many organizations operate to serve the needs of the AA's 149 thousand low- and moderate-income families. Three community contacts were made during the examination. The contacts mentioned the difficulty of working, lower-income families affording purchase or rehab loans. There is ample supply of affordable housing in the area; however, a large portion is over 50 years old and in need of repair.

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Cincinnati MSA AA 2004

| Demographic Information for Limited Scope Area: Cincinnati MSA AA2004 | | | | | | |
|--|-----------|-------------------------|---|------------------|------------------|---------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 263 | 15.21 | 20.91 | 43.35 | 19.77 | 0.76 |
| Population by Geography | 1,023,280 | 9.86 | 17.95 | 48.36 | 23.74 | 0.09 |
| Owner-Occupied Housing by Geography | 256,886 | 3.54 | 14.37 | 53.29 | 28.81 | 0.00 |
| Business by Geography | 61,291 | 8.35 | 16.58 | 48.01 | 26.00 | 1.06 |
| Farms by Geography | 1,236 | 2.02 | 16.34 | 54.21 | 27.43 | 0.00 |
| Family Distribution by Income Level | 262,612 | 21.10 | 18.11 | 22.04 | 38.75 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 102,972 | 16.53 | 24.90 | 46.97 | 11.60 | 0.00 |
| Median Family Income HUD Adjusted Median Family Income for 2006 Households Below Poverty Level | | 54,771 64,600 11% | Median Housing Value Unemployment Rate (2000 US Census) | | 118,572 2.41% | |

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2006 HUD updated MFI

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Dayton MSA AA 2004

| Demographic Information for Limited Scope Area: Dayton MSA AA 2004 | | | | | | |
|--|---------|-------------------------|---|------------------|-----------------|---------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 145 | 8.97 | 24.83 | 46.21 | 20.00 | 0.00 |
| Population by Geography | 559,062 | 5.03 | 25.57 | 44.12 | 25.29 | 0.00 |
| Owner-Occupied Housing by Geography | 148,254 | 2.93 | 19.92 | 47.69 | 29.46 | 0.00 |
| Business by Geography | 33,746 | 9.41 | 22.24 | 40.10 | 28.25 | 0.00 |
| Farms by Geography | 701 | 1.85 | 14.27 | 58.77 | 25.11 | 0.00 |
| Family Distribution by Income Level | 147,464 | 20.84 | 19.07 | 22.22 | 37.87 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 58,854 | 8.80 | 35.66 | 41.90 | 13.63 | 0.00 |
| Median Family Income HUD Adjusted Median Family Income for 2006 Households Below Poverty Level | | 51,271 59,800 11% | Median Housing Value Unemployment Rate (2000 US Census) | | 97,287 2.64% | |

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2006 HUD updated MFI

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 MSA/assessment area.

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 MSA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s AA 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.
- 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 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.

- 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.
- 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 MSA/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 7.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

- Table 13. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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.
- Table 14. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 15. 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 MSA/assessment area.

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Table 1. Lending Volume

| LENDING VOLUME | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002 | | | | | | |
|----------------------------|------------------------------------|-----------------|------------|---------------------------|------------|---|------------|-------------------------------|------------|----------------------|-----------|--------------------------------------|
| 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) | |
| Full Review: | | | | | | | | | | | | |
| Columb | 100.00 | 2,074 | 212,259 | 1,016 | 113,778 | 36 | 2,514 | 0 | 0 | 3,126 | 328,551 | 100.00 |
| Limited Review: | | | | | | | | | | | | |
| Cincinnati | 100.00 | 10 | 1,753 | 44 | 8,794 | 0 | 0 | 0 | 0 | 54 | 10,547 | 100.00 |
| Dayton MSA | 100.00 | 19 | 2,412 | 10 | 783 | 0 | 0 | 0 | 0 | 29 | 3,195 | 100.00 |

*Based on June 30, 2005 market share data.

*

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

** The evaluation period for Community Development Loans is from January 01, 2005 to December 31, 2005.

*** Deposit Data as of September 14, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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Table 2. Geographic Distribution of Home Purchase Loans

| Geographic Distribution: HOME PURCHASE | | Geography: OHIO | | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002 | | | | | Market Share (%) by Geography | | | | |
|--|---------------------------|-----------------|------------------------|------------------|-----------------------------|--------------|---|--------------|--------------------------|--------------|----------|-------------------------------|------|------|------|--|
| MA/Assessment Area: | Total Home Purchase Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Overa ll | Low | Mod | Mid | Upp | |
| | # | % of Total** | % Owner Occ Units*** | % BANK Loans**** | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 350 | 98.04 | 4.24 | 0.86 | 17.30 | 23.71 | 44.44 | 58.86 | 34.02 | 16.57 | 0.93 | 0.23 | 1.80 | 1.27 | 0.37 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 1 | 0.28 | 2.78 | 0.00 | 12.01 | 0.00 | 49.20 | 100.00 | 36.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | |
| Dayton MSA | 6 | 1.68 | 5.16 | 0.00 | 13.91 | 33.33 | 51.68 | 33.33 | 29.24 | 33.33 | 0.04 | 0.00 | 0.14 | 0.03 | 0.04 | |

* Based on 2002 Peer Mortgage Data (Eastern)

** 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 1990 Census information.

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

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Table 3. Geographic Distribution of Home Improvement Loans

| Geographic Distribution: HOME IMPROVEMENT | | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002 | | | | | Market Share (%) by Geography | | | | |
|---|------------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---|--------------|--------------------------|--------------|----------|-------------------------------|------|------|------|--|
| MA/Assessment Area: | Total Home Improvement Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Over all | Low | Mod | Mid | Upp | |
| | # | % of Total** | % Owner Occ Units*** | % BANK Loans**** | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 100 | 100.00 | 4.24 | 1.00 | 17.30 | 20.00 | 44.44 | 71.00 | 34.02 | 8.00 | 3.35 | 0.79 | 4.01 | 5.00 | 0.85 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 2.78 | 0.00 | 12.01 | 0.00 | 49.20 | 0.00 | 36.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Dayton MSA | 0 | 0.00 | 5.16 | 0.00 | 13.91 | 0.00 | 51.68 | 0.00 | 29.24 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |

* Based on 2002 Peer Mortgage Data (Eastern)

** 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 1990 Census information.

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

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Table 4. Geographic Distribution of Home Mortgage Refinance Loans

| Geographic Distribution: HOME MORTGAGE REFINANCE 2002 | | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002 | | | | | | |
|--|-------------------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---------------------------|--------------|---|--------------|-------------------------------|------|------|------|------|
| MA/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 |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 1,618 | 98.72 | 4.24 | 0.49 | 17.30 | 11.87 | 44.44 | 62.73 | 34.02 | 24.91 | 2.31 | 0.40 | 2.62 | 3.63 | 1.23 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 8 | 0.49 | 2.78 | 0.00 | 12.01 | 0.00 | 49.20 | 25.00 | 36.01 | 75.00 | 0.01 | 0.00 | 0.00 | 0.01 | 0.02 |
| Dayton MSA | 13 | 0.79 | 5.16 | 0.00 | 13.91 | 0.00 | 51.68 | 38.46 | 29.24 | 61.54 | 0.05 | 0.00 | 0.00 | 0.04 | 0.07 |

* Based on 2002 Peer Mortgage Data (Eastern)

** 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 1990 Census information.

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

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Table 5. Geographic Distribution of Multifamily Loans

| Geographic Distribution: MULTIFAMILY | | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002 | | | | | Market Share (%) by Geography | | | | |
|--------------------------------------|-------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---|--------------|--------------------------|--------------|---------|-------------------------------|------|------|------|--|
| MA/Assessment Area: | Total Multifamily Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Overall | Low | Mod | Mid | Upp | |
| | # | % of Total** | % of MF Units*** | % BANK Loans**** | % MF Units*** | % BANK Loans | % MF Units*** | % BANK Loans | % MF Units*** | % BANK Loans | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 6 | 85.71 | 17.12 | 16.67 | 25.30 | 50.00 | 35.58 | 33.33 | 22.00 | 0.00 | 3.02 | 2.56 | 5.45 | 3.92 | 0.00 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 1 | 14.29 | 20.75 | 0.00 | 19.59 | 0.00 | 43.65 | 0.00 | 16.00 | 100.00 | 0.37 | 0.00 | 0.00 | 0.00 | 3.03 | |
| Dayton MSA | 0 | 0.00 | 13.08 | 0.00 | 20.76 | 0.00 | 44.57 | 0.00 | 21.59 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |

* Based on 2002 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** 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.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

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Table 6. Geographic Distribution of Small Loans to Businesses

| Geographic Distribution: SMALL LOANS TO BUSINESSES | | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002 | | | | | | |
|--|----------------------------|--------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|---|--------------|--------------------------------|------|-------|------|------|
| 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 Business*** | % BANK Loans | % of Business*** | % BANK Loans | % of Business*** | % BANK Loans | % of Business*** | % BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 1,011 | 95.20 | 8.44 | 8.41 | 16.48 | 22.06 | 38.09 | 49.65 | 35.03 | 19.88 | 5.77 | 5.51 | 10.08 | 7.71 | 2.74 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 41 | 3.86 | 8.55 | 7.32 | 11.48 | 2.44 | 45.93 | 39.02 | 33.18 | 51.22 | 0.29 | 0.18 | 0.25 | 0.29 | 0.31 |
| Dayton MSA | 10 | 0.94 | 11.69 | 50.00 | 16.37 | 0.00 | 42.77 | 50.00 | 29.13 | 0.00 | 0.23 | 1.39 | 0.09 | 0.20 | 0.00 |

* Based on 2000 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 (2001).

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Table 7. Geographic Distribution of Small Loans to Farms

| Geographic Distribution: SMALL LOANS TO FARMS 31, 2002 | | Geography: OHIO | | | | | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002 | | | | | |
|---|------------------------|-----------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|---|-------------------------------|------|------|-------|-------|
| MA/Assessment Area: | Total Small Farm Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Market Share (%) by Geography | | | | |
| | # | % of Total** | % of Farms* | % BANK Loans | % of Farms* | % BANK Loans | % of Farms* | % BANK Loans | % of Farms* | % BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 36 | 100.00 | 1.16 | 0.00 | 7.53 | 0.00 | 61.41 | 88.89 | 29.79 | 11.11 | 43.37 | 0.00 | 0.00 | 48.48 | 26.67 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 2.91 | 0.00 | 11.96 | 0.00 | 53.87 | 0.00 | 31.06 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 0 | 0.00 | 1.30 | 0.00 | 8.52 | 0.00 | 67.04 | 0.00 | 23.15 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2000 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 (2001).

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Table 8. Borrower Distribution of Home Purchase Loans

| Borrower Distribution: HOME PURCHASE | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002 | | | | | | | |
|--------------------------------------|---------------------------|-----------------|----------------------|------------------|---------------------------|----------------|-------------------------|---|------------------------|------------------|--------------|------|------|------|------|
| MA/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 | % BANK Loans** | % Families*** | % BANK Loans**** | % Families** | % BANK Loans**** | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 350 | 98.04 | 19.34 | 17.86 | 17.91 | 28.87 | 24.50 | 22.92 | 38.24 | 30.36 | 1.05 | 1.60 | 0.98 | 0.83 | 1.11 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 1 | 0.28 | 20.48 | 100.00 | 16.88 | 0.00 | 22.87 | 0.00 | 39.78 | 0.00 | 0.01 | 0.04 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 6 | 1.68 | 20.02 | 0.00 | 17.75 | 16.67 | 23.67 | 16.67 | 38.56 | 66.67 | 0.05 | 0.00 | 0.03 | 0.03 | 0.13 |

* Based on 2002 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchased by bank.

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

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

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

Institution ID: 9179 PARK NATIONAL BANK

Table 9. Borrower Distribution of Home Improvement Loans

| Borrower Distribution: HOME IMPROVEMENT 2002 | | Geography: OHIO | | | | | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, | | | | | |
|---|---------------------------------|-----------------------------|----------------------------------|---------------------------------|------------------------------|---------------------------------|----------------------------------|---------------------------------|----------------------------------|--|---------------------------|------|------|------|------|
| MA/Assessment Area: | Total Home Improvement Loans | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Market Share [*] | | | | |
| | # | % of Total ^{**} | % Famili es ^{***} | % BANK Loans ^{****} | % Families [*] | % BANK Loans ^{****} | % Families [*] ** | % BANK Loans ^{****} | % Families [*] ** | % BANK Loans ^{****} | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 100 | 100.00 | 19.34 | 31.31 | 17.91 | 23.23 | 24.50 | 31.31 | 38.24 | 14.14 | 3.70 | 7.42 | 3.22 | 3.69 | 1.98 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 20.48 | 0.00 | 16.88 | 0.00 | 22.87 | 0.00 | 39.78 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 0 | 0.00 | 20.02 | 0.00 | 17.75 | 0.00 | 23.67 | 0.00 | 38.56 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2002 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

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

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

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

Institution ID: 9179 PARK NATIONAL BANK

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

| Borrower Distribution: HOME MORTGAGE REFINANCE 2002 | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, | | | | | | | |
|--|---|-----------------|-------------------------|---------------------|------------------------------|---------------------|----------------------------|--|---------------------------|----------------------|--------------|------|------|------|------|
| MA/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* | % BANK Loans**** | % Families* ** | % BANK Loans**** | % Families* ** | % BANK Loans** | Overa ll | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 1,618 | 98.72 | 19.34 | 9.11 | 17.91 | 22.67 | 24.50 | 28.59 | 38.24 | 39.63 | 2.68 | 2.61 | 2.82 | 2.71 | 2.60 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 8 | 0.49 | 20.48 | 0.00 | 16.88 | 0.00 | 22.87 | 0.00 | 39.78 | 100.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.04 |
| Dayton MSA | 13 | 0.79 | 20.02 | 0.00 | 17.75 | 7.69 | 23.67 | 23.08 | 38.56 | 69.23 | 0.06 | 0.00 | 0.02 | 0.05 | 0.12 |

* Based on 2002 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 7.0% of loans originated and purchased by bank.

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

**** 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.

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

Institution ID: 9179 PARK NATIONAL BANK

Table 11. Borrower Distribution of Small Loans to Businesses

| Borrower Distribution: SMALL LOANS TO BUSINESSES 2002 | | | Geography: OHIO | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, | | | | |
|--|---------------------------------|--------------|---|------------|--|-------------------------|---------------------------|--------------|-------------------------|
| 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**** | \$100,000 or less | >\$100,000 to \$250,000 | >\$250,000 to \$1,000,000 | All | Rev\$ 1 Million or Less |
| Full Review: | | | | | | | | | |
| Columbus MSA | 1,016 | 94.95 | 85.90 | 43.11 | 71.75 | 16.83 | 11.42 | 5.77 | 12.03 |
| Limited Review: | | | | | | | | | |
| Cincinnati MSA | 44 | 4.11 | 85.16 | 54.55 | 54.55 | 15.91 | 29.55 | 0.29 | 0.81 |
| Dayton MSA | 10 | 0.93 | 86.01 | 60.00 | 80.00 | 20.00 | 0.00 | 0.23 | 0.63 |

* Based on 2000 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 - 2001).

**** 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 25.05% of small loans to businesses originated and purchased by the bank.

Institution ID: 9179 PARK NATIONAL BANK

Table 12. Borrower Distribution of Small Loans to Farms

| Borrower Distribution: SMALL LOANS TO FARMS | | | Geography: OHIO | | Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002 | | | | |
|---|----------------------------|--------------|--|------------------|---|-------------------------|---------------------------|--------------|-------------------------|
| MA/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 \$1,000,000 | All | Rev\$ 1 Million or Less |
| Full Review: | | | | | | | | | |
| Columbus MSA | 36 | 100.00 | 92.36 | 58.33 | 77.78 | 16.67 | 5.56 | 43.37 | 48.44 |
| Limited Review: | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 89.95 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 0 | 0.00 | 93.70 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2000 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 - 2001).

**** 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 38.89% of small loans to farms originated and purchased by the bank.

NATIONAL BANK

Table 1. Lending Volume

| LENDING VOLUME | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003 | | | | | | |
|----------------------------|------------------------------------|-----------------|------------|---------------------------|------------|---|------------|-------------------------------|------------|----------------------|-----------|--------------------------------------|
| MA/Assessment Area (2003): | % of Rated Area Loans (#) in MA/AA | Home Mortgage | | Small Loans to Businesses | | Small Loans to Farms | | Community Development Loans** | | Total Reported Loans | | % of Rated Area Deposits in MA/AA*** |
| | | # | \$ (000's) | # | \$ (000's) | # | \$ (000's) | # | \$ (000's) | # | \$(000's) | |
| Full Review: | | | | | | | | | | | | |
| Columb | 97.89 | 3,747 | 410,579 | 1,035 | 137,732 | 32 | 2,972 | 0 | 0 | 4,814 | 551,283 | 89.30* |
| Limited Review: | | | | | | | | | | | | |
| Cincinnati | 1.26 | 11 | 2,189 | 51 | 10,468 | 0 | 0 | 0 | 0 | 62 | 12,657 | 10.70* |
| Dayton | 0.85 | 28 | 2,857 | 14 | 1,192 | 0 | 0 | 0 | 0 | 42 | 4,049 | 0.00 |

*Deposit percentages are from June 30, 2005 market share reports.

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2005 to December 31, 2005.

*** Deposit Data as of August 30, 2006. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: 9179 PARK NATIONAL BANK

Table 2. Geographic Distribution of Home Purchase Loans

| Geographic Distribution: HOME PURCHASE | | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003 | | | | | Market Share (%) by Geography* | | | | |
|--|---------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---|--------------|--------------------------|--------------|-------------|--------------------------------|------|------|------|--|
| MA/Assessment Area: | Total Home Purchase Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Overa ll | Low | Mod | Mid | Upp | |
| | # | % of Total** | % Owner Occ Units*** | % BANK Loans**** | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 551 | 98.92 | 3.24 | 0.54 | 18.88 | 30.31 | 44.03 | 45.37 | 33.85 | 23.77 | 1.15 | 0.20 | 2.44 | 1.26 | 0.67 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 1 | 0.18 | 3.54 | 0.00 | 14.37 | 0.00 | 53.29 | 100.00 | 28.81 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | |
| Dayton MSA | 5 | 0.90 | 2.93 | 0.00 | 19.19 | 0.00 | 48.42 | 80.00 | 29.46 | 20.00 | 0.04 | 0.00 | 0.00 | 0.06 | 0.02 | |

* Based on 2003 Peer Mortgage Data (Eastern)

** 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)

Institution ID: 9179 PARK NATIONAL BANK

Table 3. Geographic Distribution of Home Improvement Loans

| Geographic Distribution: HOME IMPROVEMENT | | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003 | | | | | Market Share (%) by Geography | | | | |
|---|------------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---|--------------|--------------------------|--------------|----------|-------------------------------|------|------|------|--|
| MA/Assessment Area: | Total Home Improvement Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Over all | Low | Mod | Mid | Upp | |
| | # | % of Total** | % Owner Occ Units*** | % BANK Loans**** | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 116 | 100.00 | 3.24 | 0.00 | 18.88 | 34.48 | 44.03 | 56.03 | 33.85 | 9.48 | 3.71 | 0.00 | 6.34 | 4.33 | 1.24 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 3.54 | 0.00 | 14.37 | 0.00 | 53.29 | 0.00 | 28.81 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Dayton MSA | 0 | 0.00 | 2.93 | 0.00 | 19.19 | 0.00 | 48.42 | 0.00 | 29.46 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |

* Based on 2003 Peer Mortgage Data (Eastern)

** 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)

Institution ID: 9179 PARK NATIONAL BANK

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

| Geographic Distribution: HOME MORTGAGE REFINANCE 2003 | | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003 | | | | | | |
|--|-------------------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---------------------------|--------------|---|--------------|-------------------------------|------|------|------|------|
| MA/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 |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 3,075 | 98.94 | 3.24 | 0.36 | 18.88 | 22.34 | 44.03 | 50.60 | 33.85 | 26.70 | 2.53 | 0.44 | 4.58 | 3.20 | 1.49 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 10 | 0.32 | 3.54 | 10.00 | 14.37 | 0.00 | 53.29 | 40.00 | 28.81 | 50.00 | 0.01 | 0.05 | 0.00 | 0.01 | 0.02 |
| Dayton MSA | 23 | 0.74 | 2.93 | 0.00 | 19.19 | 8.70 | 48.42 | 39.13 | 29.46 | 52.17 | 0.06 | 0.00 | 0.05 | 0.05 | 0.08 |

* Based on 2003 Peer Mortgage Data (Eastern)

** 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)

Institution ID: 9179 PARK NATIONAL BANK

Table 5. Geographic Distribution of Multifamily Loans

| Geographic Distribution: MULTIFAMILY | | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003 | | | | | Market Share (%) by Geography | | | | |
|--------------------------------------|-------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---|--------------|--------------------------|--------------|-------------|-------------------------------|------|------|------|--|
| MA/Assessment Area: | Total Multifamily Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Overa ll | Low | Mod | Mid | Upp | |
| | # | % of Total** | % of MF Units*** | % BANK Loans**** | % MF Units*** | % BANK Loans | % MF Units*** | % BANK Loans | % MF Units*** | % BANK Loans | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 5 | 100.00 | 14.17 | 0.00 | 31.50 | 60.00 | 34.83 | 20.00 | 19.50 | 20.00 | 2.10 | 0.00 | 3.37 | 1.47 | 3.03 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 22.56 | 0.00 | 23.05 | 0.00 | 40.92 | 0.00 | 13.47 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Dayton MSA | 0 | 0.00 | 10.81 | 0.00 | 22.42 | 0.00 | 46.90 | 0.00 | 19.86 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |

* Based on 2003 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** 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 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: 9179 PARK NATIONAL BANK

Table 6. Geographic Distribution of Small Loans to Businesses

| Geographic Distribution: SMALL LOANS TO BUSINESSES | | Geography: OHIO | | | | | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003 | | | | | |
|--|----------------------------|-----------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|---|-------------------------------|------|------|------|------|
| 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 Business*** | % BANK Loans | % of Business*** | % BANK Loans | % of Business*** | % BANK Loans | % of Business*** | % BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 1,035 | 94.09 | 8.09 | 7.05 | 20.81 | 31.40 | 39.10 | 40.97 | 32.00 | 20.58 | 2.93 | 3.33 | 5.04 | 3.17 | 1.73 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 51 | 4.64 | 9.06 | 3.92 | 16.73 | 25.49 | 47.66 | 49.02 | 25.56 | 21.57 | 0.19 | 0.07 | 0.33 | 0.21 | 0.15 |
| Dayton MSA | 14 | 1.27 | 9.72 | 0.00 | 21.33 | 71.43 | 41.04 | 21.43 | 27.91 | 7.14 | 0.12 | 0.00 | 0.41 | 0.07 | 0.03 |

* Based on 2003 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 (2004).

Institution ID: 9179 PARK NATIONAL BANK

Table 7. Geographic Distribution of Small Loans to Farms

| Geographic Distribution: SMALL LOANS TO FARMS 31, 2003 | | Geography: OHIO | | | | | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003 | | | | | |
|---|------------------------|-----------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|---|-------------------------------|------|------|-------|------|
| MA/Assessment Area: | Total Small Farm Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Market Share (%) by Geography | | | | |
| | # | % of Total** | % of Farms*** | % BANK Loans | % of Farms* ** | % BANK Loans | % of Farms* ** | % BANK Loans | % of Farms* ** | % BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 32 | 100.00 | 1.60 | 0.00 | 12.30 | 3.13 | 56.82 | 93.75 | 29.28 | 3.13 | 12.55 | 0.00 | 6.25 | 16.57 | 1.89 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 2.17 | 0.00 | 16.01 | 0.00 | 54.46 | 0.00 | 27.27 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 0 | 0.00 | 1.42 | 0.00 | 11.79 | 0.00 | 60.09 | 0.00 | 26.70 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2003 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 (2004).

Institution ID: 9179 PARK NATIONAL BANK

Table 8. Borrower Distribution of Home Purchase Loans

| Borrower Distribution: HOME PURCHASE | | Geography: OHIO | | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003 | | | | | 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**** | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 551 | 98.92 | 19.39 | 13.99 | 18.11 | 29.29 | 22.75 | 25.37 | 39.75 | 31.34 | 1.30 | 1.67 | 1.30 | 1.21 | 1.24 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 1 | 0.18 | 20.79 | 0.00 | 17.90 | 0.00 | 21.94 | 0.00 | 39.37 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Dayton MSA | 5 | 0.90 | 20.50 | 20.00 | 18.86 | 20.00 | 22.20 | 0.00 | 38.44 | 60.00 | 0.04 | 0.07 | 0.03 | 0.00 | 0.09 | |

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by bank.

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

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

* 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 2003 | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, | | | | | | | |
|---|---------------------------------|-----------------------------|----------------------------------|---------------------------------|------------------------------|---------------------------------|----------------------------------|--|----------------------------------|---------------------------------|---------------------------|------|------|------|------|
| MA/Assessment Area: | Total Home Improvement Loans | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Market Share [*] | | | | |
| | # | % of Total ^{**} | % Famili es ^{***} | % BANK Loans ^{****} | % Families [*] | % BANK Loans ^{****} | % Families [*] ** | % BANK Loans ^{****} | % Families [*] ** | % BANK Loans ^{****} | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 116 | 100.00 | 19.39 | 29.91 | 18.11 | 30.84 | 22.75 | 23.36 | 39.75 | 15.89 | 3.60 | 7.27 | 4.34 | 2.95 | 1.84 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 20.79 | 0.00 | 17.90 | 0.00 | 21.94 | 0.00 | 39.37 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 0 | 0.00 | 20.50 | 0.00 | 18.86 | 0.00 | 22.20 | 0.00 | 38.44 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 7.8% of loans originated and purchased by bank.

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

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

* 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 2003 | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, | | | | | | | |
|--|-------------------------------------|-----------------|----------------------|------------------|---------------------------|------------------|-------------------------|--|------------------------|----------------|--------------|------|------|------|------|
| MA/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* | % BANK Loans**** | % Families* ** | % BANK Loans**** | % Families* ** | % BANK Loans** | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 3,075 | 98.94 | 19.39 | 10.32 | 18.11 | 23.95 | 22.75 | 26.93 | 39.75 | 38.79 | 3.06 | 3.78 | 3.49 | 3.11 | 2.69 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 10 | 0.32 | 20.79 | 0.00 | 17.90 | 11.11 | 21.94 | 11.11 | 39.37 | 77.78 | 0.01 | 0.00 | 0.01 | 0.01 | 0.02 |
| Dayton MSA | 23 | 0.74 | 20.50 | 9.09 | 18.86 | 18.18 | 22.20 | 9.09 | 38.44 | 63.64 | 0.08 | 0.08 | 0.07 | 0.03 | 0.12 |

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

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

**** 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.

* 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 2003 | | | Geography: OHIO | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, | | | | |
|--|---------------------------------|--------------|---|------------|--|-------------------------|---------------------------|--------------|-------------------------|
| 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**** | \$100,000 or less | >\$100,000 to \$250,000 | >\$250,000 to \$1,000,000 | All | Rev\$ 1 Million or Less |
| Full Review: | | | | | | | | | |
| Columbus MSA | 1,035 | 94.09 | 63.28 | 56.71 | 67.15 | 18.65 | 14.20 | 2.93 | 5.07 |
| Limited Review: | | | | | | | | | |
| Cincinnati MSA | 51 | 4.64 | 62.37 | 54.90 | 41.18 | 31.37 | 27.45 | 0.19 | 0.32 |
| Dayton MSA | 14 | 1.27 | 62.97 | 57.14 | 71.43 | 28.57 | 0.00 | 0.12 | 0.21 |

* Based on 2003 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 - 2004).

**** 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 9.73% 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: OHIO | | Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003 | | | | |
|---|----------------------------|--------------|--|------------------|---|-------------------------|---------------------------|--------------|-------------------------|
| MA/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 \$1,000,000 | All | Rev\$ 1 Million or Less |
| Full Review: | | | | | | | | | |
| Columbus MSA | 32 | 100.00 | 89.49 | 84.38 | 68.75 | 21.88 | 9.38 | 12.55 | 15.98 |
| Limited Review: | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 86.07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 0 | 0.00 | 89.63 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2003 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 - 2004).

**** 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 6.25% of small loans to farms originated and purchased by the bank.

NATIONAL BANK

Table 1. Lending Volume

| LENDING VOLUME | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | |
|-------------------------------|--|-----------------|------------|------------------------------|------------|----------------------|------------|---|------------|-------------------------|-----------|--|--|
| MA/Assessment Area (2006): | % of Rated Area Loans (#) in MA/AA | Home Mortgage | | Small Loans to Businesses | | Small Loans to Farms | | Community Development Loans** | | Total Reported Loans | | % of Rated Area Deposits in MA/AA*** | |
| | | # | \$ (000's) | # | \$ (000's) | # | \$ (000's) | # | \$ (000's) | # | \$(000's) | | |
| Full Review: | | | | | | | | | | | | | |
| Columb | 100.00 | 2,662 | 290,012 | 2,367 | 339,270 | 80 | 6,399 | 34* | 17,700* | 5,143 | 653,381 | 100.00 | |
| Limited Review: | | | | | | | | | | | | | |
| Cincinnati | 100.00 | 332 | 46,302 | 147 | 37,322 | 0 | 0 | 0 | 0 | 479 | 83,624 | 100.00 | |
| Dayton | 100.00 | 19 | 2,309 | 33 | 8,799 | 0 | 0 | 0 | 0 | 52 | 11,108 | 100.00 | |

* 5 CD loans totaling \$8.1 Million were outside the AA.

* Loan Data as of June 30, 2006. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2005 to December 31, 2005.

*** Deposit Data as of August 31, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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Table 2. Geographic Distribution of Home Purchase Loans

| Geographic Distribution: HOME PURCHASE | | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | 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 | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 1,025 | 83.54 | 3.22 | 0.88 | 18.59 | 29.85 | 42.34 | 50.83 | 35.84 | 18.44 | 0.87 | 0.27 | 1.77 | 1.21 | 0.33 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 192 | 15.65 | 3.54 | 0.52 | 14.37 | 13.02 | 53.29 | 68.75 | 28.81 | 17.71 | 0.01 | 0.00 | 0.02 | 0.01 | 0.01 | |
| Dayton MSA | 10 | 0.81 | 2.93 | 0.00 | 19.92 | 50.00 | 47.69 | 40.00 | 29.46 | 10.00 | 0.03 | 0.00 | 0.08 | 0.01 | 0.02 | |

* Based on 2004 Peer Mortgage Data (Eastern)

** 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)

Institution ID: 9179 PARK NATIONAL BANK

Table 3. Geographic Distribution of Home Improvement Loans

| Geographic Distribution: HOME IMPROVEMENT | | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | Market Share (%) by Geography | | | | |
|---|------------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---|--------------|--------------------------|--------------|----------|-------------------------------|------|------|------|--|
| MA/Assessment Area: | Total Home Improvement Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Over all | Low | Mod | Mid | Upp | |
| | # | % of Total** | % Owner Occ Units*** | % BANK Loans**** | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 321 | 95.54 | 3.22 | 0.62 | 18.59 | 33.33 | 42.34 | 55.14 | 35.84 | 10.90 | 2.67 | 1.05 | 3.99 | 3.23 | 1.06 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 14 | 4.17 | 3.54 | 0.00 | 14.37 | 28.57 | 53.29 | 57.14 | 28.81 | 14.29 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Dayton MSA | 1 | 0.30 | 2.93 | 0.00 | 19.92 | 100.00 | 47.69 | 0.00 | 29.46 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |

* Based on 2004 Peer Mortgage Data (Eastern)

** 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)

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Table 4. Geographic Distribution of Home Mortgage Refinance Loans

| Geographic Distribution: HOME MORTGAGE REFINANCE | | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | | |
|--|-------------------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---------------------------|--------------|---|--------------|-------------------------------|------|------|------|------|
| MA/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 |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 1,302 | 92.08 | 3.22 | 0.77 | 18.59 | 27.96 | 42.34 | 51.84 | 35.84 | 19.43 | 1.16 | 0.24 | 1.95 | 1.45 | 0.60 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 106 | 7.50 | 3.54 | 0.94 | 14.37 | 8.49 | 53.29 | 70.75 | 28.81 | 19.81 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 6 | 0.42 | 2.93 | 0.00 | 19.92 | 16.67 | 47.69 | 50.00 | 29.46 | 33.33 | 0.03 | 0.00 | 0.03 | 0.04 | 0.02 |

* Based on 2004 Peer Mortgage Data (Eastern)

** 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)

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Table 5. Geographic Distribution of Multifamily Loans

| Geographic Distribution: MULTIFAMILY | | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | Market Share (%) by Geography | | | | |
|--------------------------------------|-------------------------|--------------|------------------------|------------------|-----------------------------|--------------|---|--------------|--------------------------|--------------|-------------|-------------------------------|------|------|------|--|
| MA/Assessment Area: | Total Multifamily Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Overa ll | Low | Mod | Mid | Upp | |
| | # | % of Total** | % of MF Units*** | % BANK Loans**** | % MF Units*** | % BANK Loans | % MF Units*** | % BANK Loans | % MF Units*** | % BANK Loans | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 14 | 38.89 | 12.51 | 28.57 | 32.16 | 21.43 | 34.09 | 28.57 | 21.24 | 21.43 | 3.24 | 3.51 | 2.35 | 2.90 | 5.56 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 20 | 55.56 | 22.56 | 30.00 | 23.05 | 30.00 | 40.92 | 30.00 | 13.47 | 10.00 | 2.42 | 10.8 1 | 0.00 | 2.06 | 0.00 | |
| Dayton MSA | 2 | 5.56 | 10.81 | 0.00 | 22.47 | 0.00 | 46.85 | 50.00 | 19.86 | 50.00 | 1.75 | 0.00 | 0.00 | 0.00 | 8.33 | |

* Based on 2004 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** 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 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

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Table 6. Geographic Distribution of Small Loans to Businesses

| Geographic Distribution: SMALL LOANS TO BUSINESSES | | | Geography: OHIO | | | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | | |
|--|----------------------------|--------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|---|--------------|-------------------------------|------|------|------|------|
| 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 Business*** | % BANK Loans | % of Business*** | % BANK Loans | % of Business*** | % BANK Loans | % of Business*** | % BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 2,367 | 92.93 | 7.81 | 9.04 | 19.51 | 30.16 | 37.97 | 40.35 | 34.71 | 20.45 | 2.52 | 4.01 | 4.64 | 2.80 | 1.30 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 147 | 5.77 | 8.35 | 6.80 | 16.58 | 28.57 | 48.01 | 31.97 | 26.00 | 32.65 | 0.22 | 0.20 | 0.51 | 0.11 | 0.27 |
| Dayton MSA | 33 | 1.30 | 9.41 | 3.03 | 22.24 | 33.33 | 40.10 | 45.45 | 28.25 | 18.18 | 0.11 | 0.12 | 0.13 | 0.15 | 0.05 |

* Based on 2005 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 (2006).

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Table 7. Geographic Distribution of Small Loans to Farms

| Geographic Distribution: SMALL LOANS TO FARMS | | Geography: OHIO | | | | | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | |
|---|------------------------|-----------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|---|-------------------------------|------|------|-------|------|
| MA/Assessment Area: | Total Small Farm Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Market Share (%) by Geography | | | | |
| | # | % of Total** | % of Farms* | % BANK Loans | % of Farms* | % BANK Loans | % of Farms* | % BANK Loans | % of Farms* | % BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 80 | 100.00 | 1.92 | 0.00 | 12.69 | 8.75 | 54.94 | 82.50 | 30.44 | 8.75 | 10.03 | 0.00 | 9.09 | 12.04 | 4.84 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 2.02 | 0.00 | 16.34 | 0.00 | 54.21 | 0.00 | 27.43 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 0 | 0.00 | 1.85 | 0.00 | 14.27 | 0.00 | 58.77 | 0.00 | 25.11 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2005 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 (2006).

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Table 8. Borrower Distribution of Home Purchase Loans

| Borrower Distribution: HOME PURCHASE | | Geography: OHIO | | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | 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**** | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Columbus MSA | 1,025 | 83.54 | 19.47 | 12.96 | 18.18 | 26.23 | 22.80 | 24.14 | 39.55 | 36.68 | 0.97 | 1.17 | 1.07 | 0.78 | 1.00 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Cincinnati MSA | 192 | 15.65 | 21.10 | 13.41 | 18.11 | 34.08 | 22.04 | 27.93 | 38.75 | 24.58 | 0.01 | 0.00 | 0.00 | 0.00 | 0.04 | |
| Dayton MSA | 10 | 0.81 | 20.84 | 20.00 | 19.07 | 30.00 | 22.22 | 0.00 | 37.87 | 50.00 | 0.03 | 0.00 | 0.06 | 0.00 | 0.05 | |

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 6.6% of loans originated and purchased by bank.

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

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

* 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: OHIO | | | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | | |
|---|------------------------------|--------------|----------------------|------------------|---------------------------|------------------|-------------------------|------------------|---|------------------|--------------|------|------|------|------|
| MA/Assessment Area: | Total Home Improvement Loans | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Market Share | | | | |
| | # | % of Total** | % Families*** | % BANK Loans**** | % Families* | % BANK Loans**** | % Families** | % BANK Loans**** | % Families** | % BANK Loans**** | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 321 | 95.54 | 19.47 | 20.06 | 18.18 | 27.51 | 22.80 | 25.57 | 39.55 | 26.86 | 2.96 | 4.05 | 3.43 | 2.68 | 2.46 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 14 | 4.17 | 21.10 | 28.57 | 18.11 | 21.43 | 22.04 | 35.71 | 38.75 | 14.29 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 1 | 0.30 | 20.84 | 0.00 | 19.07 | 0.00 | 22.22 | 0.00 | 37.87 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 3.6% of loans originated and purchased by bank.

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

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

* 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: OHIO | | | | | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | |
|--|-------------------------------------|-----------------|----------------------|------------------|---------------------------|------------------|-------------------------|------------------|------------------------|---|--------------|------|------|------|------|
| MA/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* | % BANK Loans**** | % Families* ** | % BANK Loans**** | % Families* ** | % BANK Loans** | Overa ll | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Columbus MSA | 1,302 | 92.08 | 19.47 | 12.25 | 18.18 | 24.57 | 22.80 | 26.68 | 39.55 | 36.50 | 1.44 | 1.61 | 1.64 | 1.42 | 1.30 |
| Limited Review: | | | | | | | | | | | | | | | |
| Cincinnati MSA | 106 | 7.50 | 21.10 | 7.22 | 18.11 | 22.68 | 22.04 | 35.05 | 38.75 | 35.05 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 6 | 0.42 | 20.84 | 0.00 | 19.07 | 20.00 | 22.22 | 20.00 | 37.87 | 60.00 | 0.03 | 0.00 | 0.03 | 0.00 | 0.06 |

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 5.6% of loans originated and purchased by bank.

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

**** 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.

* 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: OHIO | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | |
|--|---------------------------------|--------------|---|------------------|--|-------------------------|---------------------------|---|-------------------------|
| 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 |
| Full Review: | | | | | | | | | |
| Columbus MSA | 2,367 | 92.93 | 63.16 | 58.22 | 62.53 | 22.22 | 15.25 | 2.52 | 3.57 |
| Limited Review: | | | | | | | | | |
| Cincinnati MSA | 147 | 5.77 | 63.23 | 54.42 | 37.41 | 29.25 | 33.33 | 0.22 | 0.26 |
| Dayton MSA | 33 | 1.30 | 63.11 | 60.61 | 48.48 | 18.18 | 33.33 | 0.11 | 0.13 |

* Based on 2005 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 - 2006).

**** 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 5.42% 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: OHIO | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | |
|---|----------------------------|--------------|--|------------------|---|-------------------------|---------------------------|--------------|-------------------------|
| MA/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 \$1,000,000 | All | Rev\$ 1 Million or Less |
| Full Review: | | | | | | | | | |
| Columbus MSA | 80 | 100.00 | 92.84 | 96.25 | 75.00 | 20.00 | 5.00 | 10.03 | 14.58 |
| Limited Review: | | | | | | | | | |
| Cincinnati MSA | 0 | 0.00 | 91.10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Dayton MSA | 0 | 0.00 | 90.87 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2005 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 - 2006).

**** 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 2.50% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

| QUALIFIED INVESTMENTS | | Geography: OHIO | | | | Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | |
|------------------------|---------------------------------------|-----------------|----------------------------|-----------|-------------------|---|------------|------------------------------------|-----------|
| MA/Assessment Area: | Prior Period Investments [*] | | Current Period Investments | | Total Investments | | | Unfunded Commitments ^{**} | |
| | # | \$(000's) | # | \$(000's) | # | \$(000's) | % of Total | # | \$(000's) |
| Full Review: | | | | | | | | | |
| Columbus MSA | 9 | 1,568 | 91 | 6,140 | 100 | 7,708 | 99.8 | 13 | 9,073 |
| Limited Review: | | | | | | | | | |
| Cincinnati MSA | 0 | 0 | 2 | 14 | 2 | 14 | 0.2 | 0 | 0 |
| Dayton MSA | 0 | 0 | 1 | 1 | 1 | 1 | 0.00 | 0 | 0 |

^{*} '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: OHIO Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2006 | | | | | | | | | | | | | | | | | |
|---|--------------------------------|--------------------|--------------------------------|---|-------|-------|-------|--------------------------|----------------------|---|-----|-----|-----|---------------------------------------|-------|-------|-------|
| 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 |
| Full Review: | | | | | | | | | | | | | | | | | |
| ParkColumbusAA2004 | 89.24 | 30 | 75.00 | 3.33 | 23.33 | 43.34 | 30.00 | 5 | 0 | 0 | 0 | +1 | +4 | 7.21 | 23.96 | 38.72 | 30.11 |
| Limited Review: | | | | | | | | | | | | | | | | | |
| ParkCinAA2004 | 10.74 | 9 | 22.50 | 0.00 | 11.11 | 77.78 | 11.11 | 1 | 0 | 0 | +1 | 0 | 0 | 9.86 | 17.95 | 48.36 | 23.74 |
| ParkDayton2004 | 0.02 | 1 | 2.50 | 0.00 | 0.00 | 0.00 | 100.0 | 0 | 0 | 0 | 0 | 0 | 0 | 5.03 | 25.57 | 44.12 | 25.29 |