



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

PUBLIC DISCLOSURE

September 3, 2002

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**United Bank, National Association
Charter Number 443**

**401 South Sandusky Street
Bucyrus, OH 44820**

**Office of the Comptroller of the Currency
Central Ohio Field Office
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance of *UNITED BANK, NATIONAL ASSOCIATION* prepared by the Office of the Comptroller of the Currency, the institution's supervisory agency, as of September 3, 2002. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR, Part 25.

OVERALL CONCLUSIONS

INSTITUTION'S CRA RATING:

The institution has a **SATISFACTORY** record of meeting community credit needs.

- This institution meets the requirements for satisfactory performance for all applicable performance criteria.
- The bank's current and 22-quarter loan-to-deposit ratios are reasonable and commensurate with those demonstrated by local peer banks, after considering the bank's level of loans sold in the secondary mortgage market.
- Analysis of the dispersion of the bank's loans in conjunction with its performance context indicate that the majority of loans are made within the identified assessment areas and are reasonably dispersed by both borrower income and income geography.

DESCRIPTION OF INSTITUTION:

United Bank, National Association (UB) is a wholly owned subsidiary of the Park National Corporation (PNC), a \$4.5 billion, eight-bank intrastate holding company located in Newark, Ohio. PNC completed the acquisition of UB on April 30, 2000. The main office of UB is located approximately 55 miles north of Columbus, Ohio, in the city of Bucyrus, Ohio, which is the Crawford County Seat. The bank's primary business focus is retail/commercial banking and it offers traditional products and services through a total of 6 full service offices and one loan production office. Four offices contain ATM teller machines to provide 24-hour banking, and two additional stand-alone machines are also available to customers.

The bank continues to participate in several governmental lending programs including programs offered by the *Small Business Administration* and the *Ohio Linked Deposit* program. In addition, UB is one of two local banks participating in the *Welcome Home* grant program sponsored by the Federal Home Loan Bank. This program is designed to provide area low-and moderate-income borrowers with down payment and/or closing cost assistance for home purchases. UB's portion of the grant is \$37.5 thousand, and the bank had two applications pending under this program as of September 2002.

Overall, competition for loans and deposits within the bank's marketing area is strong, and comes primarily from several other local community banks, as well as branches of regional institutions. Of note, a larger affiliate bank is headquartered within one of the bank's identified lending areas and maintains a significant market share in this area. Currently, no legal or economic impediments exist that could restrict the institution's ability to serve the community's credit needs. The bank earned a rating of satisfactory at the last CRA examination completed in March 1997.

As of June 30, 2002, UB reported total assets of \$197 million, Tier One capital of \$13.4 million, with net loans representing about 46% of assets. Loans for one-to-four family residential housing purposes represented about 43% of gross loans, with the remainder divided among loans having commercial, individual or agricultural purposes. The table below shows the bank's approximate loan mix as of June 30, 2002.

<i>Loan Mix as of June 30, 2002*</i>		
Loan Type	\$ 000s	Percentage
Residential Real Estate	39,868	43
Commercial/Commercial Real estate	35,232	38
Loans to Individuals	12,980	14
Agricultural	<u>4,636</u>	<u>5</u>
Totals	92,716	100

Source: June 30, 2002 Uniform Bank Performance Report

*Based on gross loans as of June 30, 2002

DESCRIPTION OF ASSESSMENT AREAS (AA):

The bank currently has two AAs, with one representing geographies located within Metropolitan Statistical Area (MSA) #4800-Mansfield, Ohio housed in Richland and Crawford Counties, and the second AA consisting of Non-MSA geographies in Marion and Morrow counties. The AAs are contiguous and completely surround the bank's offices. The MSA AA is considered the primary AA, as internal reports show that approximately 96% of the bank's net loans, as of June 30, 2002, are contained within Crawford County offices, with the main office in Bucyrus, Ohio accounting for over 67%. In addition, the bank admittedly has been unable to fully penetrate the Non-MSA AA and is currently not a significant lending force in this area. Based on this context, conclusions are weighted heavier in the direction of the MSA AA. The AAs meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income areas.

MSA #4800 AA:

AA one (MSA) consists of 39 census tracts of the Mansfield, Ohio MSA #4800. Mansfield, Ohio is located in Richland County, approximately 60 miles northeast of Columbus, Ohio, and about 30 miles east of the bank's main office in Bucyrus. This MSA consists only of two counties, Richland and Crawford, which borders Richland to the east, and represents the bank's primary lending territory. These tracts represent all of the 13 geographies in Crawford County, with the remaining 26 tracts representing the eastern most half of Richland County including the City of Mansfield. The bank currently has three offices within this AA. All offices are located in Crawford County, with one office located almost exactly on the Crawford/Richland county border, about 15 miles west of Mansfield. As noted above, these three locations in Crawford County house a substantial majority of the bank's loans.

The overall economic condition in the AA has noted a slightly declining trend, with the consistent loss of jobs in the Mansfield area. The counties remain mostly rural (outside of the City of Mansfield) with an emphasis in agriculture, but have a fair amount of light and heavy manufacturing as well. Unemployment levels in these two counties of 6.6% in Crawford and 6.5% in Richland, as of June 2002, continue to run above the state and national levels of 5.8% and 6.0%, respectively. Current larger employers include General Motors, Timpkin Corporation, Baha Marine Corporation and General Electric. A community contact states that the Crawford County economy remains fairly strong, with the addition of several new suppliers to Honda America, but wage levels have declined. In addition, Crawford County's unemployment figures have been impacted greatly by a large technology company's reduction of over 600 jobs during the last 18 months. The contact also indicated that loans for home purchase and home improvement were felt to be the main needs of the local community, and that these products were readily available within the marketplace.

The 1990 census shows that this AA contains a total population of 149,862, with over 68% of this total contained in Richland County. The AA notes a median family income of \$31,682 and contains about 41,967 families. The HUD 2002 MSA updated median family income is \$49,100. The AA family total is made up of 19% low-income, 19% moderate-income, 25% middle-income and 37% upper-income families. Of the AA's 61,163 housing units, about 65% are owner occupied and have an average median value of \$47,398. Of the 39 tracts in this AA, 2 (5%) are classified as low-income, 9 (23%) are classified as moderate-income, 23 (59%) are

classified as middle-income, and 5 (13%) are classified as upper-income geographies. The table below summarizes the AA's income composition by geography and families.

<i>MSA AA Income Composition by Families & Geography</i>								
<i>Families & Geography</i>	<i>Low Income</i>		<i>Moderate Income</i>		<i>Middle Income</i>		<i>Upper Income</i>	
Families	8,192	19%	7,911	19%	10,458	25%	15,406	37%
Census Tracts	2	5%	9	23%	23	59%	5	13%

Source: 1990 Census Data

Non-MSA AA:

AA two consists of 22 block-numbering areas (BNA) located in Marion and Morrow Counties. These tracts represent all of Marion County and four BNAs in the northwest section of Morrow County. This AA borders the southern portion of the MSA AA discussed above. The bank currently has three offices and a loan production office in this assessment area, most in rural Marion County. Management admittedly has had difficulty penetrating this market due to the lack of a full service office in the City of Marion, limited marketing activities in this area and the fact that the bank has primarily only one experienced residential lender for the entire area. Community contacts also stated that UB is not currently a major player in the Marion market. In an attempt to better penetrate this market, UB has applied and been approved for a new full service branch location to be located directly in the City of Marion, Ohio. This new office is expected to open during the fourth quarter of 2002.

The economic condition within these counties is stable, with Marion County noting some employment growth. These two counties are mostly rural with an agricultural focus, but have a fair amount of manufacturing. Although Morrow County's unemployment rate of 6.6% is over state and national averages, the 5.7% rate noted by Marion County is slightly below both categories. Larger employers in this AA include Whirlpool Corporation, Verizon, Marion Steel and Silverline Windows. The City of Marion is also home to two correctional facilities (one federal and one state), which are also large area employers. Community contacts indicate that the AA could use additional starter-homes, and associated home loans, which are readily available within the area.

The 1990 census shows that this AA contains a population of 81,700, with 78% concentrated in Marion County. The census data also shows that the AA contains 22,136 total families and has a median family income of \$30,562. The HUD 2002 Non-MSA statewide median family income for Ohio represents \$48,700. The AA family total is made up of 18% low-income, 19% moderate-income, 25% middle-income and 38% upper-income families. Of the AA's 31,837 housing units, about 68% are owner occupied and have an average median value of \$45,622. Of the 22 BNAs in this AA, zero are classified as low-income, 4 (18%) are classified as moderate-income, 14 (64%) are classified as middle-income, and 4 (18%) are classified as upper-income geographies. The following table summarizes the AA's income composition by geography and families.

<i>Non-MSA AA Income Composition by Families & Geography</i>								

<i>Families & Geography</i>	<i>Low Income</i>		<i>Moderate Income</i>		<i>Middle Income</i>		<i>Upper Income</i>	
	Families	3,984	18%	4,206	19%	5,534	25%	8,412
BNAs	0	0%	4	18%	14	64%	4	18%

Source: 1990 Census Data

CONCLUSIONS ABOUT PERFORMANCE CRITERIA:

Loan-to-Deposit Ratio:

UB's loan-to-deposit (LTD) ratio of 52% as of June 30, 2002, and average LTD ratio over the last 22 quarters of 56% are reasonable and meet the requirements for satisfactory performance. For analysis purposes, UB's current and 22-quarter average LTD ratios were compared with a custom peer group consisting of five banks of similar size and purpose competing within the same AAs. The analysis shows that UB's LTD ratios were below both the peer group's current range of 71% to 82%, and the 22-quarter average range of 57% to 78%. However, UB's ratios are still considered reasonable, as the bank has been historically very active in originating and selling residential mortgages in the secondary market. Since January 1, 1997, UB has originated and sold 1,190 residential real estate loans totaling over \$85 million, with the bank retaining the loan servicing responsibilities in many cases. Of note, the total dollar amount of loans sold represents about 43% of total bank assets as of June 30, 2002. Had the bank elected to portfolio these loans, this amount would have significantly increased the bank's ratios.

Lending in Assessment Area:

The bank's record of lending within the AAs is reasonable and supports satisfactory performance. The bank's HMDA data for years 1999, 2000 and 2001 was reviewed to determine the level of home loans originated within each AA. The HMDA data shows that approximately 91% of total dollars and 93% of total loans originated during this period were from inside the bank's identified AAs. The following table details the bank's lending within the AA by dollar volume and number for all HMDA reported home loan originations for the years noted above.

<i>HMDA Reported Home Loan Originations</i>								
Year	Total Home Lns		Made In MSA AA		Made in Non MSA AA		% Made in AAs	
	#	\$ 000's	#	\$ 000's	#	\$ 000's	#	\$ 000
1999	377	21,788	210	11,507	145	8,426	94%	91%
2000	217	12,583	130	6,943	72	4,534	93%	91%
2001	444	36,263	252	20,465	157	12,296	92%	90%
Totals	1,038	70,634	592	38,915	374	25,256	93%	91%

Source: HMDA Loan Application Registers (LAR)

Of the 966 HMDA reported loans made in the AAs noted above, 306 (32%) loans representing \$23.6 million were for home purchase, 544 (56%) loans totaling \$38.4 million were for home

refinancing, and 116 (12%) loans for \$2.2 million were for home improvement purposes.

In addition, a sample of 20 commercial purpose loans originated between June 1998 and June 2002 was tested for performance in this area. The sample demonstrated that 16 (80%) of the commercial loans were made inside the bank's identified lending area, which further supports satisfactory performance.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes:

The distribution of residential real estate lending reflects reasonable penetration among individuals of different income levels including low- and moderate-income borrowers and supports overall satisfactory performance. In addition, the bank's record of lending to business and farms of different sizes is reasonable and further supports the overall conclusion in this area. The information below details the bank's performance in this area for each of the bank's AAs. UB's lending activity demonstrates adequate responsiveness to the credit needs of its AAs considering its size, resources, and primary business focus.

MSA #4800 AA:

To determine the bank's performance in this area, the 592 HMDA reported home loans originated in this AA from 1999 to 2001, identified in the previous table, were evaluated by borrower income level. The analysis shows that the bank made 73 (12%) of its loans to low-income borrowers, 147 (25%) to moderate-income borrowers, 180 (30%) to middle-income borrowers, and 192 (32%) to upper-income borrowers. This dispersion is reasonable when compared to the MSA AA demographics and meets standards for satisfactory performance.

Although actual home loan originations to low-income borrowers are slightly less than the percentage (19%) of low-income families in the AA, this performance is reasonable considering that over 12% (7,024) of AA households are below the poverty level and would have difficulty meeting minimum credit standards. In addition, the bank's level of lending to moderate-income borrowers compares favorably with the AA percentage (19%). The following table demonstrates the bank's dispersion of home loans by borrower income and compares this dispersion to the AA's specific family income composition.

MSA #4800 AA									
Dispersion of Home Loans by Borrower Income vs. AA Family Income Composition									
Income Category	HMDA Reported Home Loans (\$000's)								% Of MSA AA Families by Income Category
	1999		2000		2001		Total Home Loans		
	# of Lns	%	# of Lns	%	# of Lns	%	# of Lns	%	
	\$ of Lns		\$ of Lns		\$ of Lns		\$ of Lns		
Low	27	13	20	15	26	10	73	12	19%
	880	8	550	8	1,273	6	2,703	7	
Moderate	65	31	30	23	52	21	147	25	19%
	2,812	24	983	14	3,019	15	6,814	18	
Middle	57	27	40	31	83	33	180	31	25%
	3,294	29	2,249	32	6,128	30	11,671	30	
Upper	61	29	40	31	91	36	192	32	37%
	4,521	39	3,161	46	10,045	49	17,727	45	
Totals	210	100	130	100	252	100	592	100	100%
	11,507	100	6,943	100	20,465	100	38,915	100	

Source: 1999-2001 HMDA LARs & 1990 Census data

The bank's lending to business of different sizes in the MSA AA is reasonable when compared to the AA business dispersion and further supports satisfactory performance. According to the 1990 census data, 89% of all the MSA AA businesses reported total revenues of under \$1 million, 7% reported revenues of over \$1 million, and 4% did not report revenue. Based on this, a sample of 20 commercial purpose loans made in the MSA AA during the review period was tested to determine the annual revenue for each. The sample noted that 16 (80%) of these loans were made to businesses or farms with total annual revenues under \$1 million.

Non-MSA AA:

To determine the bank's performance in this area, the 374 HMDA reported home loans originated in this AA from 1999 to 2001 identified earlier were evaluated by borrower income level as well. The analysis shows that the bank made 28 (8%) of its loans to low-income borrowers, 82 (22%) to moderate-income borrowers, 122 (32%) to middle-income borrowers, and 142 (38%) to upper-income borrowers. The home loan originations to low-income borrowers are less than the percentage (18%) of low-income families in the AA. However, overall performance is reasonable considering the performance context discussed above and the fact that 12% (3,489) of the Non-MSA AA households are also below the poverty level and would have trouble meeting routine credit criteria, as well as affording the \$45,622 median cost of AA housing. In addition, the bank's level of lending to moderate-income borrowers again compares favorably with the AA percentage (19%). The following table demonstrates the bank's dispersion of home loans by borrower income and compares this dispersion to the AA's specific family income composition.

<i>Non-MSA AA</i>									
<i>Dispersion of Home Loans by Borrower Income vs. AA Family Income Composition</i>									
Income Category	HMDA Reported Home Loans (\$000's)								% Of Non-MSA AA Families by Income Category
	1999		2000		2001		Total Home Loans		
	# of Lns \$ of Lns	%	# of Lns \$ of Lns	%	# of Lns \$ of Lns	%	# of Lns \$ of Lns	%	
Low	10 346	7 4	9 281	12 6	9 280	6 2	28 907	8 4	18%
Moderate	29 1,246	20 15	17 633	24 14	36 2,304	23 19	82 4,183	22 17	19%
Middle	56 2,819	39 33	23 1,614	32 36	43 3,018	27 25	122 7,451	32 30	25%
Upper	50 4,015	34 48	23 2,006	32 44	69 6,694	44 54	142 12,715	38 50	38%
Totals	145 8,426	100 100	72 4,534	100 100	157 12,296	100 100	374 25,256	100 100	100%

Source: 1999-2001 HMDA LARs & 1990 Census data

The bank's lending to business of different sizes in the Non-MSA AA is reasonable when compared to the AA business dispersion and further supports satisfactory performance. According to the 1990 census data, 87% of all the Non-MSA AA businesses reported total revenues of under \$1 million, 6% reported revenues of over \$1 million, and 7% did not report revenue. With this data in mind, a sample of 15 commercial purpose loans made in the Non-MSA AA during the review period was tested to determine the annual revenue for each. This sample also noted that 13 (80%) of these loans were made to businesses or farms with total annual revenues under \$1 million.

Geographic Distribution of Loans:

The bank's distribution of loans throughout geographies of different income levels, including low- and moderate-income areas, is reasonable and meets standards for overall satisfactory performance. In addition, analysis reflects some lending activity in a substantial majority of all identified tracts or BNAs. The analysis below details the bank's lending activity in the different income geographies for each identified AA.

MSA AA:

To determine the bank's performance in this area, we again used the 592 HMDA reported home loans originated in this AA from 1999 to 2001, but evaluated them by income geography. This information was then compared against the MSA AA's level of owner-occupied housing units in each income category. This evaluation shows that the bank made zero loans in low-income tracts, 93 (16%) to moderate-income tracts, 458 (77%) to middle-income tracts, and 41 (7%) to upper-income tracts. This dispersion is reasonable when compared with the overall geographic and demographic income composition of the MSA AA and meets standards for satisfactory performance.

Although the bank has no home loan activity in low-income tracts, these (two total) tracts contain less than 2% (2,896) of the MSA AA's population, only 2% (1,189) of all MSA AA households, and only 1,300 housing units according to the 1990 census. This amount represents less than 2% of the total AA housing units. In addition, only 38% of the 1,300 housing units are owner-occupied, with 48% rentals and the remaining 14% vacant and/or boarded up. This situation is similar for the moderate-income tracts, which also show activity slightly below the demographic make-up (17%). The bank's nine moderate-income tracts contain only 23% of the AA population and only 19% (11,143) of the total households according to the 1990 census. In addition, 39% and 21% of all households in the low- and moderate-income tracts, respectively, are below the poverty level and would have difficulty meeting standard credit criteria. In general, the combination of these situations would not allow for numerous home loan opportunities. As 100% of the low- and 67% of moderate- income tracts are located in Mansfield, Ohio on the eastern most edge of the AA, UB's closest branch is over 15 miles away in Crestline, Ohio (Crawford County). UB closed a loan production office located in Mansfield in 1996, as activity was limited by heavy competition from several local and regional institutions. In addition, the bank now has a much larger affiliate institution located directly in downtown Mansfield, which maintains a significant market share in this area. The table below details the bank's home loan lending to different income geographies by number and dollars, and compares this activity to the level of owner-occupied housing units in each geography.

MSA #4800 AA									
Dispersion of Home Loans by Geography Income vs. AA Owner Occupied Housing Units									
Income Category	HMDA Reported Home Loans (\$000's)								% Of MSA Owner-Occupied Housing Units
	1999		2000		2001		Total Home Loans		
	# of Lns \$ of Lns	%	# of Lns \$ of Lns	%	# of Lns \$ of Lns	%	# of Lns \$ of Lns	%	
Low	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	1%
Moderate	43 1,879	31 16	20 997	16 14	30 1,667	12 8	93 4,543	16 12	17%
Middle	156 8,842	27 77	98 5,053	75 73	204 16,535	81 81	458 30,430	77 78	60%
Upper	<u>11</u> <u>786</u>	<u>29</u> <u>7</u>	<u>12</u> <u>893</u>	<u>9</u> <u>13</u>	<u>18</u> <u>2,263</u>	<u>7</u> <u>11</u>	<u>41</u> <u>3,942</u>	<u>7</u> <u>10</u>	<u>22%</u>
Totals	210 11,507	100 100	130 6,943	100 100	252 20,465	100 100	592 38,915	100 100	100%

Source: 1999-2001 HMDA LAR & 1990 Census data

In addition, the sample of 20 commercial loans made in this AA was analyzed to determine the geographic location for each. This information was then compared to the AA's geographic composition by income category detailed earlier. As expected, the sample showed that the majority (70%) of AA commercial loans were made in Crawford County. The sample also noted that 1 (5%) loan was made in low-income tracts, 3 (15%) loans were made in moderate-income tracts, 13 (65%) were made in middle-income tracts, and 3 (15%) were made in upper-income tracts. Overall, the dispersion demonstrated by the commercial loan sample is reasonable and in line with the MSA AA's geographical income dispersion and further supports satisfactory performance.

Non-MSA AA:

To determine the bank's performance in this area, we again used the 374 HMDA reported home loans originated in this AA from 1999 to 2001, but evaluated them by income geography. This information was then compared against the Non-MSA AA's level of owner-occupied housing units in each income category. This evaluation shows that the bank made 23 (6%) of its loans to moderate-income tracts, 257 (69%) to middle-income borrowers, and 94 (25%) to upper-income tracts. This dispersion is reasonable when compared with the overall geographic and demographic income composition of the Non-MSA AA, as well as the bank's branch locations. As the bank has no low-income tracts within this AA, conclusions are based on the penetration of the other three income categories. The table below details the bank's home loan lending to different income geographies by number and dollars, and compares this activity to the level of owner-occupied housing units in each geography.

<i>Non-MSA AA</i>									
<i>Dispersion of Home Loans by Geography Income vs. AA Owner Occupied Housing Units</i>									
Income Category	HMDA Reported Home Loans (\$000's)								% Of Non-MSA Owner Occupied Housing Units
	1999		2000		2001		Total Home Loans		
	# of Lns	%	# of Lns	%	# of Lns	%	# of Lns	%	
Low	NA		NA		NA		NA		NA
Moderate	10	7	5	7	8	5	23	6	12%
	303	4	122	3	332	3	757	3	
Middle	98	67	54	75	105	67	257	69	66%
	5,486	65	3,638	80	8,049	65	17,173	68	
Upper	37	26	13	18	44	28	94	25	22%
	2,637	31	774	17	3,915	32	7,326	29	
Totals	145	100	72	100	157	100	374	100	100%
	8,426	100	4,534	100	12,296	100	25,256	100	

Source: 1999-2001 HMDA LAR & 1990 Census data

The level of lending to the four moderate-income geographies in this AA (all in the city of Marion, Ohio) appears below the AA percentage (12%). However, these BNAs represent only 16% of the AA population. Middle- and upper-income geographies account for 65% and 19%, respectively, according to the 1990 census data. As noted, the census data also shows that the moderate-income areas contain only 17% of all AA housing units, and represents only 12% of all AA owner-occupied units. Also, 26% (1,259) of the households in the moderate-income BNAs are below the poverty level and would have trouble meeting minimum credit standards. In general, the combination of these items does not provide for significant home loan opportunities in these geographies. As noted before, the bank has only a loan production office in the City of Marion, but will be opening a new full service branch. This branch will be adjacent to the moderate-income tracts and management expects lending opportunities in this area to increase, going forward.

In addition, the sample of 15 commercial loans made in this AA was analyzed to determine the geographic location for each. This information was then compared to the AA's geographic composition by income category detailed earlier. The sample demonstrated that 1 (7%) loan was made in moderate-income tracts, 10 (67%) were made in middle-income tracts, and 4 (26%) were made in upper-income tracts. Considering the bank's level of penetration of this AA, the dispersion demonstrated by the commercial loan sample is reasonable and also in line with satisfactory performance.

Responses to Complaints:

The bank has not received any complaints about its CRA performance during the review period.

Compliance with Antidiscrimination Laws:

An analysis of recent public comments, consumer compliant information, and HMDA lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation. The latest comprehensive fair lending exam was performed in 1997.