



Comptroller of the Currency
Administrator of National Banks

Large Bank

Northeastern District
Western Pennsylvania Field Office
Monroeville, Pennsylvania

PUBLIC DISCLOSURE

August 23, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Metropolitan National Bank
Charter Number 23595
1 Federal Plaza West
Youngstown, Ohio 44503**

**Office of the Comptroller of the Currency
Northeastern District
Western Pennsylvania Field Office
4075 Monroeville Boulevard
Suite 300
Monroeville, Pennsylvania 15146**

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

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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 **Metropolitan National Bank** prepared by **The Office of the Comptroller of the Currency** the institution's supervisory agency, as of August 23, 1999. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

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

Block Numbering Area (BNA) Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

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 United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA) The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of 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% of the median family income.

Median Family Income (MFI) The median income determined by the United States 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 United States 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% and less than 120% of the MFI.

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

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

Small Farm Loans- Loans with original amounts of \$500 thousand 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 noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income- Income levels that are 120% or more of the MFI.

The following is a list of abbreviations and/or acronyms used throughout this Performance Evaluation.

<u>Abbreviation or Acronym</u>	<u>Full Title, Name or Description</u>
AA	Assessment Area
ATM	Automated Teller Machine
BNA	Block Numbering Area
CDBG	Community Development Block Grant
CFR	Code of Federal Regulations
CRA	Community Reinvestment Act
CT	Census Tract
FHA	Federal Housing Administration
MNBC	F.N.B. Corporation
FHLB	Federal Home Loan Bank
FNMAC	Federal National Mortgage Assistance Corp
GNMA	Government National Mortgage Association
HMDA	Home Mortgage Disclosure Act
LMI	Low- and Moderate-Income
MNB	Metropolitan National Bank
MSA	Metropolitan Statistical Area
OCC	Office of the Comptroller of the Currency
PE	Performance Evaluation
SBA	Small Business Administration
VA	Veteran Administration
YWMSA	Youngstown-Warren MSA

Overall CRA Rating

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The following table indicates the performance levels of Metropolitan National Bank (MNB) with respect to the lending, investment, and service tests.

Performance Levels	MNB		
	Performance Tests		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

Primary factors supporting the bank's overall rating include:

- Good responsiveness to credit needs and high volume of loans made within the assessment area;
- An adequate distribution of loans among borrowers of different income levels;
- A good distribution of loans to businesses of different sizes with a significant amount of loans originated at \$250 thousand or less;
- A good level of community development lending which specifically addresses identified community credit needs;
- A good geographic distribution of small business loans and an adequate geographic distribution of HMDA loans;
- An good level of investments;
- Services and delivery systems which are accessible to geographies and individuals of different income levels in the assessment area; and
- A good level of community development services.

Description of Institution

Metropolitan National Bank (MNB) is a \$243 million, full service intrastate bank headquartered in Youngstown, OH which is approximately 60 miles northwest of Pittsburgh, PA. MNB is a subsidiary of F.N.B. Corporation ("FNBC"), a \$3.5 billion holding company. The holding company operates eight other banks throughout western Pennsylvania and eastern Ohio as well as southern Florida. No MNB branches have been closed since January 1997. Currently, MNB operates 8 full-service branch offices and 8 automated teller machines throughout its assessment area (AA). MNB opened one full service branch in Howland, Ohio in September 1997. In addition, the bank improved access to low income CTs through installation of ATMs at the Campbell and Federal Plaza offices. MNB has no wholly owned subsidiaries and one partially owned subsidiary. This subsidiary has no impact on MNB's capacity to lend for community reinvestment purposes.

As of 6/30/99, total bank assets were \$243 million, including investments of \$41.1 million and loans of \$180 million. Total deposits were \$209 million. The loan portfolio was comprised of the following: 62% 1-4 family residential mortgage loans, 26% other types of loans, 6% consumer loans, and 6% commercial and industrial loans. There are no impediments, legal or otherwise, which would hinder the bank's ability to help meet the credit needs of its assessment area.

MNB competes primarily with three large, Ohio based banks headquartered in Cleveland and Columbus, OH. Competition also comes from local banking institutions and mortgage companies competing for low-and moderate-income (LMI) individuals and within LMI geographies throughout the assessment area. The bank's 8 branches are located within eastern Ohio. MNB is an active lender in its communities and has been recognized by the Small Business Administration (SBA) as a preferred lender.

Scope of Evaluation

Evaluation Period/Products Evaluated

The period of review considers HMDA and, small business loans from January 1, 1997 through December 31, 1998. We evaluated community development loans, investments, and service activities from April 1, 1997 through March 31, 1999. MNB also provided consumer loan information for auto, home equity, personal secured, and personal unsecured loans. Bank compiled data for SBA lending, investments and services were also included. Agricultural lending is not a primary product line for MNB and is not included in this assessment. Small Business and home purchase lending and community development activities received more consideration in assessing the overall rating. Metropolitan's last CRA examination was as of March 1997.

Data Integrity

There were no material issues with respect to data integrity. Public data and bank data is considered accurate.

Selection of Areas for Full Scope Review

The bank's entire AA was selected for a full scope review.

Ratings

Ratings were applied based on the bank's entire AA.

Community Contacts

A local economic development organization which serves MNB's AA was contacted in conjunction with this review. This group coordinates a variety of funding sources, educational opportunities, and practical assistance to promote economic development in the Mahoning River Valley. The group did not identify a specific credit need for the area, but did identify a need for low and no cost deposit services. The group also noted a need for further expansion regarding the marketing of economic development programs. The group believes that the right volume and variety of small business loan programs are available, but that the local population is not readily aware of their existence.

The group indicated active participation and support by FNB regarding local lending efforts for economic development.

Fair Lending Review

We completed a fair lending examination as of June 30, 1999. The objective of our examination was to determine bank compliance with fair lending laws and regulations. The scope of our examination included a review of seven declined and 28 approved loan files chosen from the 1998 HMDA-LAR, conversations with bank management, and review of internal audit reports. Our comparative analysis weighed declined prohibited basis applications (black applicant) versus approved control group applications (white applicant). No substantive violations of the provisions of the antidiscrimination laws and regulations were identified.

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 full-scope reviews, the bank's performance in the YWMSA good.

Lending Activity

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

MNB demonstrates an good responsiveness to the community's credit needs. MNB's commitment to the community is indicated by:

- A high loan to deposit average, and
- An adequate volume of HMDA and small business loans made.

MNB's average quarterly loan to deposit ratio since March 31, 1997 is 82.19%. The loan to deposit ratio as of June 30, 1999 is 85.11%. Neither number significantly varies from the quarterly national peer ratio of 82.51%.

MNB ranks 14th out of the 152 home mortgage and 53 home improvement lenders in their market area. MNB has 2.2% of the home purchase market and 1.8% of the home improvement market. There are two major lenders in their home purchase market who have over 22% of the market combined. For home improvement lending, three lenders control almost 50% of that market. As for home refinance lending, MNB is sixth out of 168 lenders in that market, with a 4.2% of the market share. The top three lenders have roughly 26% of that market.

MNB ranks 14th out of 68 business lenders in the market and has a 1.9% market share. The areas top five lenders control over 50% of area market share.

MNB ranks 7th among FDIC insured institutions within Mahoning County for deposits. Youngstown is the county seat of Mahoning County and constitutes the majority of MNB's market area. MNB's deposit market share for Mahoning County is approximately 4%.

Distribution of Loans by Income Level of the Geography

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.

MNB's geographic distribution of HMDA loans is adequate. MNB's percentage of loans in LMI tracts is below the percentage of owner occupied housing for all loan types. However, MNB's commitment to low income areas is demonstrated by exceeding its overall market share in home purchase lending. In addition, MNB approximates its overall market share in home refinance lending in moderate income areas. Home mortgage lending opportunities are impacted by area demographics. 1990 US Census data indicate a substantial percentage of persons living below poverty levels in low (47%) and moderate (25%) income tracts. In addition, a significant level of owner occupied housing is located in middle and upper income CTs (80%). The combination of a large percentage of persons below poverty level within CTs with a low level of owner occupied housing limits the bank's ability to extend home mortgages.

Small Loans to Businesses

Refer to **Table 5 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 business loans within the AA is good. The distribution of small business loans among LMI CTs approximates the distribution of businesses within those same tracts despite significant competition. However, approximately 75% of reporting businesses are located within middle and upper income CTs. In addition, 25% of businesses in LMI tracts did not report income. **Table 5 of Appendix B** details geographic distribution by the percentage of reporting small businesses and the FNB's small business lending activity within the AA.

Consumer Loans

Refer to **Tables 14-17 in Appendix C** for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

MNB's record of consumer lending is poor. The bank is well below demographics for all types of reported consumer loans. Consumer lending to LMI borrowers is impacted by a highly competitive consumer lending market. These lenders consist

of non-financial institution auto dealerships and other highly competitive, specifically targeted consumer lenders. However, the bank's performance in consumer lending does not materially impact the overall rating as consumer lending is 6% of total loans.

Lending Gap Analysis

There were no unexplained gaps in MNB's record of lending within the AA.

Inside/Outside Ratio

MNB originates a substantial majority of its housing loans and small business loans within the AA. HMDA loan data available for the period from January 1, 1997 to December 31, 1998 indicates 78% by volume and 76% of the dollar amount of housing related loans were made within the AA.

The table below details reported HMDA lending within the AA.

Loan Type	Percentage in the AA	
	#	\$
Home Purchase	77%	74%
Refinance	78%	76%
Home Improvement	82%	84%
Totals	78%	76%

MNB also originated a substantial majority of its small business loans within the AA. Small business data available for the same period indicates 74% by volume and 79% by dollar of loans made to businesses with revenues of \$1 million or less were made within the AA. MNB's commitment to small dollar, local lending is demonstrated by the high volume of small dollar loans with the AA. The following table details the percentage of small business loans delineated by dollar amounts.

Table 1 of Appendix B details MNB's overall lending activities.

Loan Type	Percentage in the AA	
	#	\$
\$100,000 or less	67%	69%
\$100,000 to \$250,000	70%	71%
Over \$250,000	83%	82%
Totals	74%	79%

Distribution of Loans by Income Level of Borrower

Home Mortgage Loans

Refer to **Tables 7, 8 and 9 in Appendix C** for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

MNB's record of housing related lending to borrowers of different income levels is adequate. The percentage of HMDA loans to moderate income borrowers approximates the percentage of moderate income families in the AA for home purchase and home improvement loans. In addition, the bank demonstrates a commitment to lending to moderate income borrowers as it exceeds its overall market share for lending among moderate income borrowers for and refinance and meets its overall market share for home purchase loans. HMDA lending among low income borrowers is below the percentage of low income families in the AA.

Small Loans to Businesses

Refer to **Table 10 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.

MNB's distribution of loans among businesses of different sizes is good. MNB's commitment to small business lending is demonstrated by its participation in SBA lending and overall market rank in a highly competitive AA. 1997 market data indicates that 98% of businesses within the AA are small businesses, with annual gross revenues of \$1 million or less. During the assessment period MNB extended 82% of total loans to businesses with gross revenues of \$1 million or less while market lenders average 59% of total loans to businesses of \$1 million or less. A substantial majority (77%) of total small business loans reported is in original amounts of \$250 thousand or less. Furthermore, MNB has demonstrated a strong commitment to small dollar lending by providing 52% of loans to area businesses at under \$100,000.

Consumer Loans

Refer to **Table 14-17 in Appendix C** for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

MNB's record of consumer lending is good. MNB distribution of auto, home equity, personal secured, and personal unsecured loans generally exceeds the percentage

of moderate income households in the AA. Consumer loans to low income borrowers approximates or is below the percentage of low income households.

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.

MNB record of Community Development lending is good. These loans are defined as those that are not reported under Small Business loans and have as their primary purpose community development. Since the previous examination, the bank has extended three Community Development loans to two different borrowers totaling \$800 thousand. Two loans were made to provide residential housing for LMI mentally handicapped persons. The third loan was made as part of a partnership consortium consisting of ten local financial institutions that loan money to local businesses. This is in conjunction with HUD to encourage existing and emerging small businesses. Participation in the program is based on projected employment goals and local revitalization efforts. This loan initiative provides loans in as little as \$1,000 increments.

Product Innovation and Flexibility

MNB has developed and/or implemented lending programs which benefit LMI borrowers and geographies within the AA. These programs include:

- HUD's Home Program - This program enables LMI applicants to receive assistance for up to 75% of down payment and closing costs.
- Family Home Ownership Program - This program is directed to LMI applicants and provides flexible underwriting standards for first time homebuyers.
- Referrals to a local mini-loan fund which provides flexible underwriting standards for very small businesses and start up businesses.
- An E-Z low-doc mortgage program which promotes affordable housing through flexible underwriting.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "high satisfactory." Based on full-scope reviews, the bank's performance in the YWMSA is good.

Refer to **Table 12 in Appendix C** for the facts and data used to evaluate the bank's level of qualified investments.

The majority of MNB's investments are not innovative and contain only minimal complexities. However, MNB has developed and implemented an innovative program to serve LMI individuals. The donation is in the form of a scholarship endowment restricted to LMI applicants at the local university. This scholarship is included in the bank's \$28M in qualified donations to organizations with community development purposes.

Metropolitan invests primarily in Ohio affordable housing projects. Two investments were made during the current period. Both of these investments were mortgage-backed securities collateralized by LMI mortgages. These investments which were designed to provide affordable housing are described below:

A \$493M investment in FNMA mortgage-backed pool backed by mortgages that serve LMI borrowers; and

A \$414M investment in a FNMA mortgage-backed security backed by mortgages that serve LMI borrowers.

These investments contain loans under programs with flexible underwriting standards that target LMI borrowers.

MNB extended \$27,975 in donations to 34 projects during the examination period. These donations represent qualified contributions to affordable housing groups, organizations supporting activities that benefit LMI individuals or geographies, and economic development.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "high satisfactory." Based on full-scope reviews, the bank's performance in the YWMSA is good.

Retail Banking Services

Refer to **Table 13 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.

MNB service and delivery systems are accessible to geographies and individuals of different income levels in the AA. Retail banking services offered are consistent throughout the assessment area. The branch network is consistent with the community's population distribution. The bank has a network of eight full service branches and ATMs throughout their assessment area. Of these 8 branches, 2 are in a low- income CT, none are in a moderate-income CT, 3 are in a middle-income CT and 3 are in an upper-income CT. Due to close geographical proximity, moderate income areas are reasonable served by branches in the remaining areas.

Business hours are reasonable with seven branches offering extended hours and Saturday service. MNB's downtown Youngstown branch is closed evenings and Saturdays as activity in that area is minimal after business hours. There are no material differences in services offered between the branches. There were no CRA related comments in the bank's Public File. ATMs are the primary alternative delivery system for retail services. Each branch is equipped with a full service ATM. Although the Federal Plaza branch is closed on Saturday, the public still has access to its ATM. MNB offers an identified community service need in a free personal checking account. Additionally, the bank offers a number of standard retail banking services. Some of these services include telephone and personal computer banking, telecommunications for the deaf, and free ATM usage at all MAC network ATMs.

Community Development Services

MNB is involved in a good level of community development services in its assessment area. The bank promotes various services that are designed to enhance the opportunities for low-moderate income customers to obtain mortgages and other products and services. Some of the activities in which Metropolitan is involved is as follows:

- A senior mortgage lender serves on the board of directors of Interfaith Home Maintenance Services, Inc. (IHMS). IHMS performs emergency home repairs for people in LMI geographies;
- A marketing officer is a committee member for the city of Youngstown downtown revitalization group. The city of Youngstown is in targeted by federal and state government for revitalization efforts.;
- Various officers participate in area trade shows designed to benefit and stimulate local business economy, including targeted revitalization areas;

- A loan officer is a board member for both Gateway to Better Living, a home for people with mental disabilities, and the Burdman Group, a battered woman's shelter. These groups primarily serve LMI populations and are located in LMI areas.;
- The bank's Federal Plaza branch manager is a board member and finance committee member of the Beatitude House, a single mother/battered woman's shelter;
- The bank participates in revitalization efforts with the city of Youngstown through monetary contributions and time commitments of bank staff;
- Numerous bank staff participates in and MNB sponsors homebuyer and small business workshops;
- Bank management and staff participate in and MNB sponsors of credit counseling courses for LMI borrowers;
- Bank staff participate in and MNB provides monetary commitments to the Jubilee Urban Renewal Corporation for LMI geographies; and
- Bank staff participate in CHOICE (Community Housing Options Involving Cooperative Efforts), assisting LMI individuals in home purchases.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term Δ Full-Scope Δ) and those that received a less comprehensive review (designated by the term Δ Limited-Scope Δ). Public data through December 31, 1998 was available for analysis. However, internal bank data and activities were reported through March 31, 1999.

Time Period Reviewed	Lending Test: January 1, 1997 to December 31, 1998 HMDA and Small business loans. Community development loans - April 1, 1997 to March 31, 1999 Investment Test: April 1, 1997 to March 31, 1999 Service Test: April 1, 1997 to March 31, 1999	
		Products Reviewed
Metropolitan National Bank (MNB) Youngstown, Ohio		Mortgage loans, small business loans, community development loans, and investments
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Youngstown-Warren MSA #9320	Full Scope	

Appendix B: Market Profiles for Full-Scope Areas

MNB has one AA. That AA contains a portion of the Youngstown-Warren Metropolitan Statistical Area (YWMSA - 9320). It is reasonable for MNB to exclude portions of the MSA because their small branch network does not readily access those areas. The AA meets regulatory guidelines and does not arbitrarily exclude any LMI individuals and/or geographies. Thirty-two, or 41%, of the CTs are designated LMI. The AA contains 78 Census Tracts (CT) that are delineated as follows:

	Low		Moderate		Middle		Upper		AA Total	
	#	%	#	%	#	%	#	%	#	%
AA	13	17%	19	24%	31	40%	14	18%	77*	99%*

"Source: 1990 Census Bureau"

* The AA included one CT that did not report income information.

1990 Census Bureau data for the AA is as follows:

Updated Median Family Income - \$42,500
 Median Housing - \$49,866
 Median Housing Age - 44 years
 Population - 289,823
 Owner Occupied Housing Units - 118,975
 Census Median Family Income - \$30,605

The major employers in the AA include a large automobile assembly plant, a health and hospital system, local government, product distribution centers, and service industries. The service industry has experienced the most employment growth for the periods from 1993-1998.

The tables below detail reported business information for individual assessment areas.

AA	Total Reporting Businesses	≤ \$1 Million		> \$1 Million		Income Not Reported
	9,668	7,094	932		1,642	

"Source: "Dun and Bradstreet Business Demographic"

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; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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.

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 rank and 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 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 rank and market share information based on the most recent aggregate market data available.

Table 6. 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 rank and market share information based on the most recent aggregate market data available.

Table 7. 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 rank and market share information based on the most recent aggregate market data available.

Table 8. Borrower Distribution of Home Improvement Loans See Table 7.

Table 9. Borrower Distribution of Refinance Loans See Table 7.

Table 10. 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. Borrower Distribution of Small Loans to Farms Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 12. Qualified Investments Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. 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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

Table 13. 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 14. Geographic and Borrower Distribution of Consumer Loans For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of the population within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998												
MSA /AA	% of Total MNB Deposits in Rated Area	Home Mortgage		Small Business		Small Farms		Community Development		Total Reported Loans		% of Total reported MNB Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
YWMSA	100	930	54,329	170	28,668	NA	NA	3	800	1,102	83,795	100
Full Scope:												

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998																
MSA / AA	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Over all Market Rank*	Market Share by Geography*				Total Home Purchase Loans		
	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans		Over all	Low	Mod	Mid		Upper	#
YWMSA	6.42	2.50	14.12	6.50	46.86	56	32.59	35	14	2.21	6.15	1.27	2.73	1.80	200	100

Full Scope:

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998

MSA / AA	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Over all Market Rank*	Market Share by Geography*				Total Home Improvement Loans	
	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans		Over all	Low	Mod	Mid	Upper	#
YWMSA	6.42	3.20	14.12	9.60	46.86	54.40	32.59	32.80	14	1.85	.92	1.62	3.02	125	100

Full Scope:

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998																
MSA / AA	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Over all Market Rank*	Market Share by Geography*				Total Home Mortgage Refinance Loans		
	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans		Over all	Low	Mod	Mid		Upper	#
YWMSA	6.42	.99	14.12	10.91	46.86	48.10	32.59	40	6	3.82	0	3.59	4.65	4.26	605	100

Full Scope:

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998																
MSA/ AA	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Over all Mrkt Rank *	Market Share by Geography*				Total Small Business Loans		
	% of Bus- inesses	% MNB Loans	% of Bus- inesses	% MNB Loans	% of Bus- inesses	% MNB Loans	% of Bus- inesses	% MNB Loans		Over all	Low	Mod	Mid		Upper	#
Full Scope:																
YWMSA	10.1	9.4	12.7	9.4	36.4	25.3	40.5	54.7	14	1.91	1.46	2.17	1.23	2.95	170	100

(*) Based on 1998 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998																
MSA / AA	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Over all Mrkt Rank *	Market Share by Geography*				Total Small Business Loans		
	% of Farms	% MNB Loans	% of Farms	% MNB Loans	% of Farms	% MNB Loans	% of Farms	% MNB Loans		Over all	Low	Mod	Mid		Upper	#
Full Scope:																
YWMSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

(*) Based on 1998 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HMDA HOME PURCHASE State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998																
MSA /AA	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Over all Mrkt Rank **	Market Share by Borrower Income**			Total Home Purchase Loans			
	% of Families	% MNB Loans *	% of Families	% MNB Loans *	% of Families	% MNB Loans *	% of Families	% MNB Loans *		Over all	Low	Mod		Mid	Upper	
YWMSA	20.26	7	18.07	19	21.82	27	39.85	46.50	14	2.21	2.21	2.35	2.64	2.16	200	100

Full Scope:

(*) As a percentage of loans with borrower income information available. No information was available for .50% of loans originated by MNB.
 (**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998																
MSA /AA	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Over all Mkt Rank **	Market Share by Borrower Income**				Total Home Improvement Loans		
	% of Families	% MNB Loans *	% of Families	% MNB Loans *	% of Families	% MNB Loans *	% of Families	% MNB Loans *		Over all	Low	Mod	Mid		Upper	#
YVWMSA	20.26	4.80	18.07	18.40	21.82	28	39.85	48.80	14	1.85	.89	.50	1.76	3.16	125	100

Full Scope:

(*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by MNB.
 (**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998																
MSA /AA	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Over all Mkt Rank **	Market Share by Borrower Income**			Total Home Mortgage Refinance Loans			
	% of Families	% MNB Loans *	% of Families	% MNB Loans *	% of Families	% MNB Loans *	% of Families	% MNB Loans *		Over all	Low	Mod		Upper	#	% of Total
YWMSA	20.26	4.79	18.07	15.04	21.82	21.49	39.85	58.68	6	3.82	1.67	3.77	3.81	6.02	605	100

Full Scope:

(*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by MNB.
 (**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998											
MSA / AA	Business with Revenues of \$1 million or less		Loans by Original Amount of Business Size		Market Share****		Total Small Business Loans				
	% of Businesses*	% MNB Loans**	Market Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
YWMSA	98.24	82.4	58.6	52.4	25.3	22.4	1.91	2.78	170	100	189

Full Scope:

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

(**) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by MNB.

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

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

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998											
MSA / AA	Farms with Revenues of \$1 million or less		Loans by Original Amount of Farm Size		Market Share****		Total Small Farm Loans				
	% of Businesses*	% MNB Loans**	% Market Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
YWMSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Full Scope:

(*) Farms with revenues of \$1 million or less as a percentage of all farms.
 (**) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small farm loans. No information was available for 0% of loans originated by MNB.
 (***) The market consists of all other Small Farm reporters in MNB's assessment area and is based on 1997 Aggregate Small Farm Data only.
 (****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998						
MSA /AA	Prior Period Investments*		Current Period Investments		Total Investments	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's) % of Total \$'s
YWMSA	0	0	36	935	36	935 100

Full Scope:

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.
 (**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998															
MSA / AA	Deposits			Branches				ATMs				Population			
	% of Total MNB Deposits	# of MNB Branches	% of Total MNB Branches	Location of Branches by Income of Geographies			Location of ATMs by Income of Geographies			% of Total MNB ATMs	% of the Population within Each Geography				
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
YWMSA	100	8	100	25	0	37.5	37.5	25	0	37.5	37.5	9.54	15.36	43.31	31.79

Full Scope:

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

Geographic and Borrower Distribution: CONSUMER LOANS State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998

MSA/ AA	Geographic Distribution						Borrower Distribution						Total Consumer Loans				
	Low-Income Geographies		Moderate- Income Geographies		Middle- Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate- Income Borrowers			Middle-Income Borrowers		Upper- Income Borrowers	
	% of Pop*	% MNB of Lns	% of Pop*	% MNB of Lns	% of Pop*	% MNB of Lns	% of Pop*	% MNB of Lns	% of Pop*	% MNB of Lns	% of Pop*	% MNB of Lns		% of Hshlds	% MNB of Lns	% of Hshlds	% MNB of Lns
YWMMSA	9.54	3.74	15.36	7.10	43.31	48.22	31.79	40.93	18.50	15.10	20	18.5	23.55	40.6	28.60	535	100

Full Scope:

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

Table 15. Geographic and Borrower Distribution of Consumer Loan Originations (Home Equity)

Geographic and Borrower Distribution: CONSUMER LOANS State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998

MSA / AA	Geographic Distribution						Borrower Distribution						Total				
	Low-Income Geographies		Moderate-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Upper-Income Borrowers		#	% of TTL			
	% of Pop*	% MNB Lns	% of Pop*	% MNB Lns	% of Pop*	% MNB Lns	% of Hshlds	% of MNB Lns	% of Hshlds	% of MNB Lns							
YVMSA	9.54	.68	15.36	3.19	43.31	42.14	31.79	53.99	7.06	15.10	12.53	18.50	23.69	40.60	53.08	439	100

Full Scope:

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

Table 16. Geographic and Borrower Distribution of Consumer Loan Originations (Personal Secured)

Geographic and Borrower Distribution: CONSUMER LOANS State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998																		
MSA / AA	Geographic Distribution						Borrower Distribution						Total					
	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	Total Consumer Loans				
	% of Pop*	% MNB Lns	% of Pop*	% MNB Lns	% of Pop*	% MNB Lns	% of Hshlds	% MNB Lns	% of Hshlds	% MNB Lns	% of Hshlds	% of Hshlds	#	% of Ttl				
YWMSA	9.54	1.32	15.36	5.18	43.31	49.04	31.79	44.47	25.80	12.18	15.10	16.45	18.50	22.13	40.60	41.42	985	100

Full Scope:

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

Table 17. Geographic and Borrower Distribution of Consumer Loan Originations (Personal Unsecured)

Geographic and Borrower Distribution: CONSUMER LOANS State: Ohio Evaluation Period: January 1, 1997 to December 31, 1998																			
MSA/AA		Geographic Distribution						Borrower Distribution						Total Consumer Loans					
		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		#	% of Ttl
		% of Pop*	% MNB Lns	% of Pop*	% MNB Lns	% of Pop*	% MNB Lns	% of Pop*	% MNB Lns	% of Hshlds	% MNB Lns	% of Hshlds	% MNB Lns	% of Hshlds	% of Hshlds	% MNB Lns			
YVMSA	9.54	1.84	15.36	9.43	43.31	42.53	31.79	46.21	25.80	15.86	15.10	21.15	18.50	22.99	40.60	35.17	435	100	

Full Scope:

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