



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

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Community Reinvestment Act Performance Evaluation

Security National Bank and Trust Company
Charter Number: 6594

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NOTE: 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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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 CRA performance of **Security National Bank and Trust Company (SNBT)** prepared by the **Office of the Comptroller of the Currency (OCC)** the institution's supervisory agency, as of **May 15, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. 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.

Overall CRA Rating

Institution's CRA Rating: "Satisfactory"

The following table indicates the performance level of **Security National Bank and Trust Company** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Security National Bank and Trust Company 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:

- y Lending levels that reflect a good responsiveness by SNBT to the credit needs of the AA.
- y Good distribution of SNBT's loans among geographies and among borrowers of different income levels throughout its AA.
- y Community development lending which has an overall positive impact on the Lending Test conclusion.
- y Investments that reflect a good responsiveness by SNBT to the needs of its AA.
- y Excellent accessibility of SNBT's offices to geographies and individuals of different income levels and good responsiveness of SNBT's services to the needs of its AA.
- y Leader in providing community development services.

Description of Institution

Security National Bank and Trust Company (SNBT) is a \$624 million institution headquartered in Springfield, Ohio, which is about 50 miles west of Columbus, Ohio. The bank is an IntraState bank that operates 15 branches throughout the contiguous Ohio Counties of Clark, Greene, and Fayette. In November 1997, the bank entered Fayette County through an acquisition of a financial institution in Jeffersonville, Ohio. SNBT is a wholly owned subsidiary of Security Banc Corporation, which is also headquartered in Springfield, Ohio. As of December 31, 1999, Security Banc Corporation is a \$976 million multi-bank holding company. In addition to this bank, Security Banc Corporation also owns Citizens National Bank in Urbana, Ohio and Third Savings Bank located in Piqua, Ohio. Security is a full-service bank with primary focus on real estate lending (with a strong emphasis on 1-4 family residential properties) and small business lending, and a secondary focus on consumer lending.

SNBT has 15 full-service offices and 11 ATMs throughout its AA. These ATMs are located at most SNBT offices and one is at a non-bank location.

As of December 31, 1999, the bank's net loans represented 62% of total assets. Security's loan portfolio consisted of 57% real estate loans, 23% commercial and industrial loans, 17% consumer loans, and 3% farm loans. Over the evaluation period, 91% of the home mortgages and 89% of the small loans to businesses were originated in the bank's AA. The bank's Tier 1 capital was \$55,973 million, which equated to an 8.9% tier 1-leverage ratio.

As of June 1999, 100% of SNBT's deposits were derived in its AA. SNBT's deposits in the AA total \$440 million. Based on FDIC deposit market share data as of June 30, 1999, this equates to a 19% deposit market share that ranks SNBT as the largest deposit taking institution in the AA.

The bank is under no financial, legal, or regulatory impediments that could limit its ability to help meet the credit needs of its assessment area.

SNBT was rated "Outstanding" at its last CRA evaluation dated January 15, 1997.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period of the Lending Test was October 1, 1996 through December 31, 1999 for home mortgage loans. Small business lending was evaluated from January 1, 1997 through December 31, 1999. The community development loans, the Investment Test and the Service Test were evaluated from October 1, 1996 through May 15, 2000. These dates are based on the time period products were reviewed at the last evaluation.

Market comparisons in this review consist of 1998 HMDA and 1998 Small Business Reporters serving the same geographic areas as the bank. The 1999 market data is not available as of this review. Deposit market data compiled by the Federal Deposit Insurance Corporation is used in this analysis. The most recent and available information is as of June 1999. We used the data to obtain the bank's deposit levels by county and by city in Fayette County.

Data Integrity

HMDA data used to analyze the bank's lending performance was reviewed for accuracy. We sampled 41 applications taken by the bank during 1998. While we did note some minor exceptions with 11 applications, we determined that the HMDA data was reliable. The exceptions were not considered a significant misrepresentation of relevant HMDA data. Since that review, the bank has taken action to ensure better accuracy of HMDA data.

During January 1999, we reviewed CRA data to determine its accuracy. We found that the data was incorrectly being reported. We performed a subsequent review in October 1999. After reviewing 22 loans originated during 1999, we determined that the data was accurate. We found that the bank had improved its internal controls and review processes to ensure for accurate reporting.

Selection of Areas for Full-Scope Review

The bank's one AA received a full-scope review. See information listed in Appendix A for more information.

Ratings

The bank's overall rating is based on the bank's performance in their AA. When determining conclusions for the Lending Test, home mortgage products were weighed more heavily than small loans to businesses. The volume of home mortgage loans was 72% higher than small business loans. Within home mortgage loans, home purchase and home-improvement loans were weighed equally as community contacts identified these types of loans to be important credit needs.

Community Contacts

Three community contacts were made during the evaluation. In Clark County, where the bank has its significant branch and deposit presence, housing credit needs identified were affordable home purchase loans with special consideration of borrowers limited credit, problem credit, or limited employment history, and affordable home-improvement financing. In Greene County, the identified credit needs are bringing new business into Xenia, the financing of small business and the educating of small businesses.

Additionally, in the year 2000 the City of Springfield recently implemented a four-year Consolidated Plan to address community needs. A grand total of 128 service agencies, real estate agencies, and banks were contacted to conduct surveys to facilitate this Plan. The Plan identifies community needs that include additional transitional housing for formerly homeless persons, providing potential first-time homebuyers with information on home and budgeting for home ownership, more public and subsidized housing, and repair of owner and renter-occupied housing. Jobs needed include additional manufacturing jobs, more higher wage jobs, and training for jobs that do not require a college education. Refer to the Market Profile in Appendix B of this Evaluation for more information.

Fair Lending Review

A comparative file analysis of home loan refinancings was performed to determine compliance with antidiscrimination laws. The analysis consisted of comparing five Black female borrowers to 29 White male borrowers approved during 1998. Based on the analysis, we found no evidence of discriminatory or other illegal credit practices on any prohibited basis.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions

The bank's performance under the Lending Test is rated "High Satisfactory". The bank's performance in its 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.

In the AA, 54% of the loans originated/purchased during the evaluation period were home mortgage loans, with small loans to businesses comprising the majority of the remainder. Small loans to farm originations were only 7%.

Among home mortgage loan originations/purchases, 24% were for home purchase, 35% were for home-improvement, and 41% were for home mortgage refinance.

SNBT's lending activity is good. In the AA, SNBT ranks first in terms of deposit market share (19%). Based on 1998 CRA aggregate data, SNBT is the largest originator/purchaser of small loans to businesses (20%) and the second largest originator/purchaser of small loans to farms (24%). Based on 1998 aggregate data, SNBT is the third largest originator/purchaser of home improvement loans (10%). Two large multi-state regional banks lead the market share with one bank a percent above SNBT and the other bank with market share double that of SNBT (22%). SNBT's market share of home purchase loans and home mortgage refinance loans is less than the deposit market share in the AA.

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.

The overall geographic distribution of home mortgage loans is good.

Home purchase loan geographic distribution is good. The portion of home purchase loans made in low-income geographies exceeds and in moderate-income is fairly consistent with the portion of owner-occupied units that are within those geographies. The market shares for loans made in low- and moderate-income geographies are less than SNBT's overall market share for home purchase loans.

Home improvement loan geographic distribution is excellent. The portion of home improvement loans made in low- and moderate-income geographies exceeds the portion of owner-occupied units that are within those geographies. The market shares for loans made in low- and moderate-income geographies exceed SNBT's overall market share for home improvement loans.

Refinance loan geographic distribution is good. The portion of refinance loans made in low- and moderate-income geographies is fairly consistent with the portion of owner-occupied units that are within those geographies. The market shares for loans made in low- and moderate-income geographies are less than SNBT's overall market share for refinance loans.

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 loans to businesses is excellent. SNBT is the number one lender of small loans to businesses in the AA.

The portion of small loans to businesses in low-income exceeds and in moderate-income is fairly consistent with the portion of businesses in those geographies. Also, the market shares for such loans in low- and moderate-income geographies exceed SNBT's overall market share that supports excellent performance.

Small Loans to Farms

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 farms.

The geographic distribution of small loans to farms is good. The portion of small loans to farms in low- and moderate-income geographies is fairly consistent with the portion of farms located in those geographies. The bank did not make any loans in low-income geographies during 1998. The bank's market share of small loans to farms in moderate-income geographies exceeds the bank's overall market share for loans to small farms.

Lending Gap Analysis

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

Inside/Outside Ratio

A substantial majority of the home mortgage loans, small loans to businesses and farms and CD loans originated by SNBT over the evaluation period were within its AA. Ninety one percent of the bank's HMDA loans, 89% of the bank's small loans to businesses, 75% of loans to small farms, and 100% of CD loans were made within its AA. This performance was positively factored into the overall analysis of the geographic distribution.

Distribution of Loans by Income Level of the 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.

Home purchase loan borrower distribution is good. The portion of home purchase loans to low-income borrowers is considerably less than the portion of families that are defined as such. However, according to the City of Springfield Consolidated Plan (2000), local realtors indicate a lack of new, affordable "starter" homes in the Springfield area. Also, low-income borrowers' ability to afford a home is hampered by a relatively high level of households living below the poverty level. The portion of home purchase loans to moderate-income borrowers exceeds the portion of families that are defined as such. In addition, market shares for loans made to low- and moderate-income borrowers exceed SNBT's overall market share for home purchase loans.

Home improvement borrower distribution is excellent. The portion of home improvement loans to low-income borrowers is close and to moderate-income borrowers exceeds the portion of families that are defined as such. Market shares for loans made to low- and moderate-income borrowers exceed SNBT's overall market share for home purchase loans.

Refinance loan borrower distribution is good. The portion of refinance loans to low-income borrowers is considerably less and to moderate-income borrowers exceeds the portion of families defined as such. Market shares for loans made to low- and moderate-income borrowers exceed SNBT's overall market share for refinance loans.

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.

The borrower distribution of loans to small businesses is excellent. SNBT's percentage of lending to businesses with revenues of \$1 million or less exceeds the percentage of lending to businesses made by aggregate lenders in the AA and it also exceeds the percentage of businesses in the AA with revenues of \$1 million or less. Also, the bank's market share of lending to businesses with revenues of \$1 million or less is higher than its market share for overall small business lending. Additionally, SNBT has a high percentage of loans small in size, amounts of \$100 thousand or less.

Small Loans to Farms

Refer to Table 11 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 loans to small farms is good. SNBT's percentage of lending to farms with revenues less than \$1,000,000 is consistent with the percentage of farms in the AA and is higher than the percentage of lending by the overall market, aggregate lenders in the AA. However, the bank's market share of lending to farms with revenues of \$1,000,000 or less is less than its market share for overall small farm lending. SNBT has a high percentage of loans small in size, amounts of \$100,000 or less.

Community Development Lending

CD lending had a positive impact on the Lending Test conclusions. In the AA primary community development lending needs included affordable home purchase and home improvement loans.

SNBT's CD lending included loans for home-improvement, home purchase, and economic development. During the evaluation period, SNBT originated 13 CD loans totaling \$2,177,568.

The following is a sample of CD loans:

- SNBT originated a \$1.3 million construction/permanent loan for the purchase and rehabilitation of 16 homes in poor condition along Springfield's South Fountain Avenue Historic District, a low-income area. These homes are rented to low- and moderate-income persons. This project was part of a \$3.4 million project that was funded by approximately \$2 million in tax credits and monies from the City of Springfield. The project also offered training opportunities to men, women and minorities to assist in the building process and utilize the experience to become certified carpenters, electricians, painters, and plumbers.
- SNBT originated a \$100,150 loan to finance improvements to an 18-unit apartment complex in a moderate-income area in Xenia, Ohio. These units are rented to low- and moderate-income persons.
- SNBT originated a \$250,000 loan to a local government office to expand the major throughway in the City of Springfield. This road extends through low- and moderate-income areas. It is part of the city's plan to improve access to local businesses and the downtown area that is primarily a low-income area.

Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on the Lending Test conclusions. SNBT offers flexible mortgage-related lending programs serving low- and moderate-income borrowers. The program is not considered innovative.

The "Affordable Housing" Mortgage is a program initiated by SNBT for borrowers who wish to purchase and occupy single family homes. Borrowers are provided financing up to \$60,000, a 5% down payment, reduced closing costs of \$750, and no private mortgage insurance is required. Borrowers using this program are allowed a housing expense ratio of 30% and total debt ratio of 40% of gross income. Borrowers must maintain a deposit account at SNBT. A reduction of 1/4% on interest rate is given to borrowers that elect the bank's automatic mortgage payment plan. Over the evaluation period, SNBT originated 12 loans totaling \$453,375.

INVESTMENT TEST

Conclusions

The bank's performance under the Investment Test is rated "High Satisfactory".

The bank's performance in its AA is "good". Refer to Table 12 in Appendix C for

the facts and data used to evaluate the bank's level of qualified investments.

SNBT has a significant level of qualified community development investments. During the evaluation period, SNBT made 37 investments totaling \$1.8 million. The volume of investments is considered high given the size and capacity of SNBT and the moderate level of opportunities in the AA (refer to the Market Profile in Appendix B).

SNBT exhibits a good responsiveness to credit and community economic development needs. In the AA primary credit needs were affordable home purchase loans and home-improvement loans. The bank made investments to various housing, social service, and civic organizations that service low- and moderate-income persons. Investment opportunities identified during the evaluation included two local municipals bonds, a few local low-income housing tax credits, and grant and donation opportunities to a wide array of charitable organizations. SNBT invested in one of the three low-income housing tax credits and one of the two local municipal bonds identified during this evaluation. Investment activity includes:

SNBT purchased \$1.4 million of a \$1.5 million local municipal bond issuance created to finance the construction of a city service and maintenance facility in a moderate-income area. The facility helped stabilize the moderate-income area by maintaining and improving jobs for low- and moderate-income individuals.

SNBT invested \$155 thousand of a \$500 thousand commitment in the Ohio Capital Corporation for Housing - Equity Fund VII, an Ohio state-wide low-income housing tax project. This tax credit financed a local housing project (Village of Springfield) that constructed 40 housing units for low- and moderate-income persons.

SNBT had at least 35 other investments that were donations totaling \$294 thousand to various community organizations that provide housing, business, social service, and civic organizations formed to provide services to low- and moderate-income persons and in low- and moderate-income geographies.

SERVICE TEST

Conclusions

The bank's performance under the Service Test is rated "Outstanding".

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.

SNBT's offices are readily accessible to geographies and individuals of different income levels throughout its AA. Financial services are offered at each branch and business hours do not vary in a way that inconveniences any portion of the AA, particularly to low- and moderate-income geographies and to low- and moderate-income individuals. The bank has an excellent level of community development services.

The bank's distribution of branches in low-income geographies exceeds the distribution of the population living in such geographies. In moderate-income geographies SNBT's distribution of offices is consistent with the population in such geographies. During the evaluation period, SNBT's branching activity consisted of one branch opening in a middle-income geography in Fayette County.

SNBT's hours and services offered throughout the AAs are good. Office hours and services in the AA, including the availability of loan officers for all loan products, are comparable among locations regardless of the income level of the geography. Banking hours and services provided Monday through Friday is supplemented by Saturday hours at all but the main office, located in a low-income area. However, SNBT has several offices in close proximity, within 1.5 miles to 2.5 miles, of the main office. This area is neither a heavy retail area with a significant amount of businesses open on Saturday, nor is it considered a residential area.

SNBT's deposit products include a "no minimum balance" checking and saving account to all its customers and a low-cost checking account for senior citizens age 62 years and older. The bank also cashes checks for non-bank customers.

Alternate Delivery Systems

SNBT's alternative delivery systems are not specifically targeted to low- and moderate-income families or geographies. Since data on how these systems affect low- and moderate-income individuals and low- and moderate-income geographies was not available, significant weight could not be placed on this area when drawing conclusions on the Service Test.

SNBT's ATM network is a convenient alternative delivery system for offering its retail banking services in low- and moderate-income geographies and to low- and moderate-income individuals. The ATMs are either drive-up or walk-up. The percentage of SNBT's ATMs in low-income geographies (11%) is higher and in moderate-income geographies (9%) is lower than the percentage of the population that resides in those geographies. These ATMs are at all the bank's offices in low- and moderate-income areas, except for one. Additionally, SNBT has a stand-alone ATM located at a medical facility in a middle-income area.

SNBT's offers "The Security Direct 24-Hour Telephone Banking product" that allows customers convenient access to their accounts. This system allows customers to obtain deposit and loan account information, transfer funds between accounts at the bank, and make loan payments. The bank also offers a debit card through VISA and banking by mail.

Community Development Services

Security's performance in providing community development (CD) services to its AA is excellent.

The bank's CD services were focused on revitalizing downtown Springfield (a low-income geography), providing expertise and advice to small businesses, and serving on organizations that provide housing for low- and moderate-income persons and in low- and moderate-income geographies. SNBT has taken a leadership role in community development services as demonstrated below. SNBT is represented on the boards and committees of the major housing and business organizations in the AA and at two of these organizations is the only bank represented on active committees. SNBT management serve in a lead position, as chairperson, of several organizations.

Major highlights of CD service activities in the AA include:

Heritage Center Steering Committee—The Heritage Committee was formed to revitalize the Heritage Center, a low-income block in downtown Springfield, Ohio. The Heritage Center is an historical landmark (Old Market Place). The development of this market place is a \$10 million project that includes the development of the Clark County Historical Society. This project will spur bringing businesses into town, including small businesses, and create jobs for low- and moderate-income people. SNBT's chairman serves on the Steering Committee that was instrumental in raising \$4,000,000 in private funds and assisted in locating government funding. This committee was instrumental in bringing together necessary individuals to make this project a reality. The Center will also be used as an educational center for both the city and county school systems.

Springfield Metropolitan Housing Authority—This is a government agency that provides affordable housing to low- and moderate-income people, the disabled, and the elderly. The bank's CRA officer chairs the finance committee of this organization. This officer served in this capacity through a crucial transitional period for the Authority. Functions also performed included coordinating third party annual audits conducted by the State of Ohio, coordinating a review of the Housing Agency's finances, and recruiting a finance director.

Center City Association—The purpose of the association is to bring activity and vendors to stabilize downtown Springfield, Ohio, a low-income area. A bank employee assists this Association with identifying methods to attract new business, including small businesses, to the downtown area and to create an environment for the citizens to use for business and recreation.

Increasing Homeownership Task Force—The purpose of this task force is to determine reasons for low home ownership in the City of Springfield (largely a low- and moderate-income area) and to find methods to increase home ownership. One of the bank's loan officers is a member of this task force. This officer has assisted the Task Force in identifying methods to increase homeownership, developing a homebuyer education system to help qualify potential borrowers, coordinating outreach and marketing efforts of the program, and obtaining funding for the program.

Community Housing Advisory Board—This board advises the City of Springfield Commissioners on the city's housing needs and ways to allocate HUD monies. The bank's CRA Officer and one of its lending officers are board members of the Advisory Board. SNBT was the only bank represented on this Board. Other Board members consisted of real estate agents, landlords, a women's shelter, the construction industry, and mentally retarded and developmentally disabled people.

Consolidated Plan Steering Committee—This committee was formed to comply with the five year HUD requirement for the City of Springfield to compose a plan on how HUD monies will be invested. A SNBT lending officer assisted on this committee. As a committee member, the officer assisted the City in the planning process that included identifying strengths, weaknesses, and opportunities, and prioritizing strategies to assess housing needs in Springfield.

Community Reinvestment Coalition—The coalition focuses on providing affordable housing for low- and moderate-income persons. The bank's CRA Officer is a member of the coalition and provides comments on the structure and funding of the Path to Homeownership program and ways to measure lender performance, e.g., through HMDA data analysis.

Clark County Community Development Corporation—This corporation assists small businesses with financing alternates and provides technical support. The bank's President serves as president of this corporation. Functions include reviewing loan applications for SBA 504 loans; advising applicants on qualification standards; and recommending whether the applications should be approved. Advice is also given to the Corporation on how to promote the program through the banks.

Springfield Financial Group—This group focuses on providing financing for small businesses. The bank has two commercial lenders that are members of this group. The lenders serve on the loan review committee that reviews loan applications and makes recommendations on loans for the SBDC revolving loan fund.

Clark County Fair Housing Board—This board focuses on the adequacy and fair access of housing for all persons, particularly low- and moderate-income persons. The bank was represented on this group by one of its commercial lenders. This lender served as Treasurer, served on the committee to develop the Affordable Housing Handbook, and assisted the committee on general lending issues. The Board is currently discussing Predatory Lending and this lender has volunteered to help educate consumers concerning Predatory Lending.

Clark County Department of Human Services Planning Council—This agency coordinates and distributes public assistance money to recipients. The bank's CRA Officer is the only banking official in the County on this Council. Functions have included providing a banker's view on efforts to help people get into the workforce and off public assistance. Assistance was provided on other matters presented to the Council, e.g., budget and programs.

Greene County Development Corporation—This corporation assists in the economic development of Greene County through financing small businesses. A bank employee served as Chairman of the Board for the past six years. Tasks included working with corporate staff to develop loan policies, budget, marketing and strategic planning. This employee has been a member of the Board of Directors for past ten years and assisted in setting policy and on the loan committee to evaluate SBA loan requests.

Small Business Development Center—This center assists small businesses with obtaining financing and provides technical support. The bank has lending officers that assist this center with managing its lending to small businesses and on other issues such as budget, personnel, maintenance, and tenant issues.

Greene County Microenterprise Loan Program—This program focuses on providing financing to small businesses. An employee of the bank assisted this group in developing a \$50,000 grant application to the State of Ohio. This included working with Greene County staff to inform local banks about the program and solicit seed money to match the grant. Also this employee serves as a member on the Board of Trustees who oversee the loan program and is on the Loan Committee reviewing loan applications and businesses' financial capacity.

Supporting Council of Preventive Effort (SCOPE)—SCOPE's mission is to assist individuals and families living in poverty with emergency housing, case management, job training, utility bills, and to provide safe and affordable housing for low- and moderate-income persons. A bank employee served as Chairman of the Bankers Advisory Committee 1999-2000 and has been a member since its inception in 1993. Bank acted in the development of programs that provide housing for low-moderate income families, the arrangement of participation loans for new homes being constructed by Greene County Career Center and/or the rehabilitation of existing homes for resale to low-moderate income families. Technical assistance has included developing a three-way partnership with local Banks, the Greene County Career Center (student training) and SCOPE. This partnership was formed to help with the education of students in building trades, to collaborate with other banks in Greene County to make loans and assist SCOPE in developing and marketing programs that provide home ownership counseling to low- and moderate-income families.

Habitat for Humanity—This is a nonprofit housing agency that provides homes to low- and moderate-income persons. A bank employee served on the board of this organization. Duties included providing advice on such topics as mortgage rates for borrowing needs, construction costs on new homes, and developing/maintaining business accounts.

Clark County Homebuyers Fair—A prime purpose of this fair was to promote home ownership to all persons, including low- and moderate-income persons. At this housing fair, the bank conducted a seminar to inform consumers on how to apply for a loan, financial institution lending criteria, and what documentation an individual should bring to apply for a real estate loan.

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 ΔFull-Scope) and those that received a less comprehensive review (designated by the term ΔLimited-Scope).

Time Period Reviewed	Lending Test: October 1, 1996 to December 31, 1999 Investment Test: October 1, 1996 to May 15, 2000 Service Test: October 1, 1996 to May 15, 2000	
Financial Institution	Products Reviewed	
(Security National Bank and Trust Company(SNBT) Springfield, Ohio)	Home mortgage loans Small business loans Small farm loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Dayton/Springfield #2000 And City of Jeffersonville	Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews
Dayton/Springfield MSA 2000/City of Jeffersonville B-2

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Market Profile

Demographic Information for the Area: MSA 2000/DAYTON-SPRINGFIELD/CITY OF JEFFERSONVILLE		Evaluation Period 10/01/1996 TO 12/31/1999										
Demographic Characteristic	Total		Low Income Tracts		Mod Income Tracts		Middle Income Tracts		Upper Income Tracts		NA Income Tracts	
	#	%	#	%	#	%	#	%	#	%	#	%
Geographies (Census Tracts/BNAs)	81	7.41	6	19.75	16	51.85	42	18.52	15	2.47	2	
Population by Geography	291,687	5.78	16,866	19.01	55,445	54.63	159,343	20.58	60,033	0.00	0	
Owner-Occupied Housing by Geography	73,534	3.20	2,353	14.12	10,385	58.17	42,772	24.51	18,024	0.00	0	
Business by Geography	7,910	7.90	625	18.47	1,461	50.52	3,996	23.10	1,827	0.01	1	
Farms by Geography	734	0.68	5	12.13	89	74.52	547	12.53	92	0.14	1	
Family Distribution by Income Level	79,855	19.79	15,803	17.80	14,216	25.11	20,049	37.30	29,787	0.00	0	
Distribution of Low and Moderate Income Families throughout AA Geographies	30,019	10.48	3,147	26.08	7,828	54.30	16,299	9.14	2,745	0.00	0	
Median Family Income	35,999		Median Housing Value		64,180							
HUD Adjusted Median Family Income for 1999	52,400		Unemployment Rate		3.81%							
Households Below Poverty Level	11.57%											

Source: 1990 US Census and HUD update MFI

SNBT's assessment area (AA) consists of 81 geographies. These geographies include portions of the Dayton-Springfield MSA and two non-MSA areas in Fayette County that are adjacent. Within the Dayton-Springfield MSA, SNBT delineated two of the three counties, Clark and Greene Counties, in which it has offices. The non-MSA portion of the AA represents the entire City of Jeffersonville. The bank's AA does not extend substantially beyond the boundaries of the MSA. Of the entire 81 designated geographies, 6 (7%) are low-income, 16 (20%) are moderate-income, 42 (52%) are middle-income, 15 (19%) are upper-income, and 2 (2%) are NA. The bank's assessment area is consistent with regulatory requirements. Low- and moderate-income areas are not arbitrarily excluded.

The housing stock in the area is primarily older single family homes. In the main portion of the bank's AA, Springfield, many homes are in need of repair and are boarded up. In relation to new housing, local realtors (as mentioned in the City of Springfield Consolidated Plan) indicate a shortage of new, affordable, starter homes. According to the Department of Housing and Urban development, there is a relatively high level of rental units. Within the low-income areas, 53% of the housing units are renter occupied and 14% are vacant. Within the moderate-income areas, 44% of the housing units are renter occupied and 6% are vacant. In the AA 12% of the households are living below the poverty level.

As of December 1999, the unemployment rates of Clark, Greene, and Fayette Counties (3.8%, 3.1%, and 3.6%, respectively) were reasonable in comparison to the State of Ohio's unemployment rate of 3.8%. No significant fluctuations in unemployment rates for the Counties were noted.

The local economy is service-oriented. The largest employers include Wright Patterson Airforce Base, Navistar International, Wright State University, the County Governments of both Clark and Greene, the Community Hospital, and the City of Springfield Board of Education.

Three community contacts were made during the evaluation. These contacts included a local government housing office, a community housing development organization, and an economic development organization.

Based on the demographics and the identified needs of more affordable housing, unmet credit and community development needs exist in the MSA. A moderate level of community resources and opportunities for partnerships exist to facilitate activities to address the unmet credit and community development needs of the AA. Community resources and opportunities for partnerships exist with nonprofit housing organizations, community service organizations, and micro-loan funds that service the AA. The AA has one active certified housing development organization and four other nonprofit housing organizations that provide services to low- and moderate-income borrowers and in low- and moderate-income areas. Competition for community development loans, investments

and services in the AA is moderate and consists primarily of local financial institutions in the AA and out-of-area mortgage companies.

Competition is high in the assessment area. There are a total of 10 commercial banks and five savings banks. Within the AA, competition includes banking offices of large holding companies including The Huntington National Bank (Columbus, Ohio), Key Bank, National Association (Cleveland, Ohio), and National City Bank (Cleveland, Ohio). The bank is the only bank with assets between \$500 million and \$1 billion. There are two smaller local community banks.

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 bank's 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 bank's 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 1. Lending Volume

LENDING VOLUME		Evaluation Period 10/01/1996 TO 12/31/1999											
		% of Rating Area Deposits in AA*		Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans	
MSA/Assessment Area		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)
Full Scope													
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville		100.00	2,029	103,050	1,449	101,680	238	12,180	2	2,178	3,717	219,088	100.00

* Deposit Data as of June 30, 1999

* Deposit Data as of June 30, 1999

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Evaluation Period 10/01/1996 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Home Purchase Loans		
	% 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	#	% of Total**
Full Scope																
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	3.20	4.00	14.12	11.58	58.17	76.84	24.51	7.58	9	2.72	2.47	2.08	4.09	0.59	475	100

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Evaluation Period 10/01/1996 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography				Total Home Improvement Loans		
	% 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	#	% of Total**
Full Scope																
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	3.20	3.94	14.12	17.86	58.17	73.42	24.51	4.78	3	10.00	11.11	12.54	12.04	2.20	711	100

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.
 ** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

Charter Number 6594

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Evaluation Period 10/01/1996 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography				Total Home Mortgage Refinance Loans		
	% 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 Scope																
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	3.20	2.41	14.12	13.12	58.17	78.10	24.51	6.38	8	3.05	2.74	2.69	4.61	0.57	831	100

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.
 ** Refinance loans within an MSA/AAA as a % of all refinance loans in the rating area.

Charter Number 6594

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS		Evaluation Period 01/01/1997 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies	Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Small Business Loans			
	% of Businesses	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**	
Full Scope																
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	7.90	11.04	18.47	17.67	50.53	66.80	23.10	4.49	1	19.96	30.26	22.55	26.52	2.80	1,449	100.00

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

Charter Number 6594

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM		Evaluation Period 01/01/1997 TO 12/31/1999															
		Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*		Market Share by Geography*		Total Loans Small Farm Loans			
		% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	Overall	Rank*	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																	
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville		.68	.42	12.14	11.30	74.63	84.10	12.55	4.18	2	24.12	0.00	26.67	24.37	18.75	239	100.00

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Farm loans within an MSA/AAA as a % of all Small Farm loans in the rating area.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE		Evaluation Period 10/01/1996 TO 12/31/1999														
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*				Total Home Purchase Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	19.79	10.32	17.80	23.79	25.11	24.00	37.30	37.89	9	2.72	3.49	2.99	2.19	3.72	475	100

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available. . No income information for 4% of home purchase loans reported by the bank.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Evaluation Period 10/01/1996 TO 12/31/1999														
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*				Total Home Improvement Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	19.79	19.69	17.80	27.14	25.11	26.58	37.30	24.75	3	10.00	14.98	11.25	10.04	7.37	711	100

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available. No income information for 2% of home improvement loans reported by the bank.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Evaluation Period 10/01/1996 TO 12/31/1999														
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*			Total Loans			
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Upp	#	% of Total	
Full Scope																
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	19.79	9.99	17.80	18.53	25.11	31.65	37.30	33.69	8	3.05	3.58	3.44	3.99	2.85	831	100

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available. . No income information for 6% of refinance loans reported by the bank.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS									
Evaluation Period 01/01/1997 TO 12/31/1999									
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount of Business Size		Market Share* Rev \$ 1 Million or Less	All	#	% of Total
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	> \$100,000 to \$250,000				
Full Scope									
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	68.62	77.36	59.66	84.82	8.42	6.76	19.96	1,449	100.00

* The market consists of all other Small Business reporters in BANK's assessment area and is based on 1998 Aggregate Small Business Data Only only

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 6% of small loans to businesses reported by the BANK.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM		Evaluation Period 01/01/1997 TO 12/31/1999								
MSA/Assessment Area	Farms With Revenues of \$ 1 million or less		% Distribution Loans by Original Amount Regardless of Farm Size		Market Share*		Total Small Farm Loans			
	% Farms**	% Bank Loans***	\$100,000 or less	> \$100,000 to \$250,000	All	Rev \$ 500 Thousand or Less	#	% of Total		
Full Scope										
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	91.95	91.21	88.60	89.54	5.86	4.60	24.12	23.76	239	100.00

* The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1998 Aggregate Small Business Data Only only

** As a Percentage of Farms with known revenues.

*** As a percentage of loans with borrower income information available.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		Evaluation Period 01/01/1997 TO 12/31/1999							
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment		Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
MSA 2000 Dayton-Springfield/Clark and Greene Counties and City of Jeffersonville	0	0	37	1,784	37	1,784	100.00	1	345

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

** "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM		Evaluation Period 01/01/1997 TO 12/31/1999															
MSA/Assessment Area	Deposits % of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Branches Location of Branches by Income of Geographies (%)			# of Branch Closing s	# of Branch Opening s	Branch Openings/Closings Net gain(+) / loss(-) of branches due to openings/closings			Population % of the Population with Each Geography*					
				Low (%)	Mod (%)	Upp (%)			Low	Mod	Upp	Low	Mod	Upp			
Full Scope MSA 2000 Dayton- Springfield/Clark and Greene Counties and City of Jeffersonville	100.00	15	100.00	13.33	20.00	60.00	6.67	0	1	0.00	0.00	1.00	0.00	5.78	19.01	54.63	20.58

* The percentage of the population in the MSA/AAA that resides in these geographies.