

# Public Disclosure

July 6, 1998

## Community Reinvestment Act Performance Evaluation

Star Bank, N.A.  
Charter Number: 24  
425 Walnut Street  
Cincinnati, Ohio 45202

Office of the Comptroller of the Currency  
Large Bank Supervision  
250 E Street, SW  
Washington, D.C. 20219

**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.

# TABLE OF CONTENTS

<b>General Information</b>	<b>1</b>
<b>Definitions and Common Abbreviations</b>	<b>2</b>
<b>Overall CRA Rating</b>	<b>4</b>
<b>Description of Institution</b>	<b>7</b>
<b>Scope of Evaluation</b>	<b>8</b>
<b>Fair Lending Review</b>	<b>12</b>
<b>Multistate Metropolitan Area and State Ratings</b>	
<b>Cincinnati, OH Multistate Metropolitan Area</b>	<b>13</b>
<b>Louisville, KY Multistate Metropolitan Area</b>	<b>21</b>
<b>State of Ohio</b>	<b>27</b>
<b>State of Indiana</b>	<b>47</b>
<b>State of Kentucky</b>	<b>52</b>
<b>Appendix A: Summary of Multistate Metropolitan Area and State Ratings</b>	<b>67</b>
<b>Appendix B: Tables of Performance Tables</b>	<b>68</b>

## 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 (LMI) 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 **Star Bank, National Association, Cincinnati, Ohio (Star Bank)** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of July 6, 1998. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area (AA) evaluation may include 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 C.F.R. 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 with 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 bank branches 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 refinancings 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, branch openings and closings).

**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 incomes 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:** This institution is rated **Satisfactory**.

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

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

\*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

### Lending Test

- ! The bank's responsiveness to community credit needs is good considering the most pressing credit needs in its assessment areas.
- ! Lending performance in the State of Ohio is good. Overall lending performance is excellent in the Cleveland-Lorain-Elyria, OH MSA, and with 16% of the bank's deposits that MSA represents the bank's largest market area in Ohio. Lending in the remaining Ohio assessment areas is generally adequate.
- ! Lending performance in the Cincinnati, OH multistate MSA is excellent, particularly with its home loan distribution in low- and moderate-income areas. There is also a high level of community development loans in this assessment area.
- ! Lending performance in Indiana is adequate for this small assessment area with just 3% of the bank's deposits.
- ! Lending performance in Kentucky is adequate. Small business lending performance is excellent in the Owensboro MSA and in the Central Kentucky assessment area.

- ! Lending performance in the Louisville, KY multistate MSA is adequate. Small business lending is good.
- ! There are no unexplained gaps in geographic lending distribution.
- ! The bank offers two flexible and affordable home loan products for low- and moderate-income borrowers, both under the bank's Home Advantage Program (HAP). One product is for home purchase, and the other is for home improvement. The program is available to certain borrowers, primarily low- and moderate-income borrowers, based on county household income guidelines. Also, the program provides for lower down payments and less stringent underwriting guidelines. Under the HAP program, the bank approved 667 home purchase loans in 1997 totaling \$37.8 million, and 286 home improvement loans totaling \$1.3 million. These products are available in most assessment areas.

### Investment Test

- ! Investment activities reflect good responsiveness to needs in the assessment areas and total approximately \$22.4 million in volume.
- ! Investments in the Cincinnati, OH and Louisville, KY multistate MSAs reflect good and excellent performance, respectively.
- ! Investment levels are good in Ohio and adequate in Kentucky. However, the investments are concentrated among a few assessment areas. In Indiana, performance is also adequate, but opportunities for investment are limited.

### Service Test

- ! The bank provides a good level of services to its assessment areas. Services include traditional branch delivery systems and alternative delivery systems, such as ATMs and banking by phone. In addition to their overall convenience to all customers, these alternative delivery systems are available to those individuals who lack or cannot otherwise afford transportation to banking facilities, and are a time/cost savings for small businesses with limited resources.
- ! The bank's delivery systems are accessible to all portions of its assessment areas. Services, including business hours, meet the needs of the customers living in the bank's assessment areas, including LMI geographies, and/or individuals. Changes in branch locations have not adversely affected the availability of delivery systems within its assessment areas, and in some assessment areas, the bank has opened branches in LMI geographies.
- ! The bank provides a good level of community development services overall, and an excellent level in the Cincinnati, OH multistate MSA. Community contacts indicate the bank is a community development leader in the Cincinnati, OH multistate MSA. These contacts included governmental officials who indicated the bank strongly influences the development of its communities, including economically depressed geographies.

- ! The bank provides credit and financial counseling among other important services. Of particular note is the bank's Loan-A-Thon program. These one-day neighborhood meetings provide participants with the ability to apply for credit. The bank also maintains partnerships with a number of organizations that provide technical assistance on financial matters, sponsor credit counseling and home buyer workshops, and provide planning counseling to small businesses, including first time or start-up small businesses. Overall community development services have reached many individuals and small businesses, including those that are LMI, or those individuals who live in economically depressed geographic areas. Community contacts specifically highlighted the need for such services.



## Description of Institution

Star Bank, owned by Star Banc Corporation, is a multistate bank holding company with headquarters in Cincinnati, Ohio. The bank has total assets of \$13.9 billion as of March 31, 1998 and operates a branch network throughout Ohio, and portions of Indiana and Kentucky. Star Bank is a full service financial institution that provides a wide range of consumer, commercial and trust financial products, including deposit, credit, and investment services. While the holding company has operating subsidiaries that generate loan activity, such as Star Banc Finance, the bank makes loans directly and has no operating subsidiaries that lend to the general public. There are no financial or legal impediments to the bank's CRA performance.

The table below shows, a significant portion (30.7%) of the bank's loan portfolio consists of home mortgages (1-4 and multifamily), which we determined was a significant credit need within the bank's assessment area.

Loan Type	Percent of Loan Portfolio (Average Gross Loans)
Construction and Land Development Loans	4.8%
Loans Secured by Farmland	0.4%
Loans Secured by 1-4 family residential properties	27.3%
Loans Secured by multifamily residential properties	3.4%
Loans to Finance Agricultural Production	0.3%
Consumer Loans to Individuals (includes Credit Cards)	15.5%
Commercial and Industrial Loans	23.0%
Other Loans	25.3%

Source: March 31, 1998 Call Report

## Recent Acquisitions

On February 17, 1998, Star Bank completed the acquisition of Great Financial Corporation, Louisville, Kentucky. The acquisition added approximately \$3.0 billion in assets, \$1.9 billion in deposits and a branch network of forty-three offices in Kentucky and two in Indiana. In late February, Star Bank revised its assessment areas to incorporate Great Financial Corporation. Accordingly, the CRA activities of Great Financial Corporation are included in this Performance Evaluation, primarily in the discussion of new assessment areas located in Kentucky and the Louisville, KY multistate MSA. However, since this acquisition preceded the examination by a little more than a month, we did not weight heavily the activities in these new assessment areas in the bank's component and overall CRA ratings.

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## Scope of Evaluation

### CRA Evaluation Period and Scope

We examined the bank's CRA performance from our last examination dated June 30, 1996 to March 31, 1998. Unless noted in our analysis comments and data tables, the bank's performance information is primarily through March 31, 1998. Home lending data for the full years of 1996 and 1997 are used for presentation and analysis purposes. Also, bank reported 1997 small business and farm lending data was used due to its reliability. Our testing of bank reported 1996 data revealed some inaccuracies. Aggregate 1996 market data for all reporting financial institutions was used in our comparisons of home lending products and 1997 aggregate market data was used for comparisons of small business and small farm lending, as these were the most recent data available. Information relating to small farm lending was not considered in the rating of this institution, primarily because it is not a significant part of the bank's business strategy. However, data relating to the bank's small farm lending are included in Tables 6 and 11. The bank did not present consumer loan data for review, therefore, it was not considered in our analysis.

### Ratings

Since Star Bank has branches in three states, we evaluated performance and assigned a state rating for Ohio, Indiana and Kentucky. We also evaluated performance and assigned a rating for the Cincinnati, OH and Louisville, KY multistate MSAs, as the bank had branches in two or more of the states within each of these MSAs. Performance in these two MSAs is not included in the State of Ohio or Kentucky ratings.

The bank's overall rating is a blend of the state and multistate MSA ratings. Performance in Ohio and the Cincinnati, OH multistate MSA received the most weight in assigning the bank's overall rating because these areas comprise 47% and 34% of bank deposits, respectively. Within each state, we gave greater weight to those assessment areas where the bank had a larger market presence, considering such factors as deposit levels.

### Selection of Full-Scope Assessment Areas for Review

Bank management identified 18 assessment areas in Ohio, Indiana, and Kentucky that include 13 MSAs. While we reviewed and analyzed the bank's performance in all assessment areas, the state ratings are based primarily on those assessment areas that received full-scope review. Of the bank's 18 assessment areas, we selected 7 for full-scope review. Five of these assessment areas were selected to provide better insight of the bank's performance in each state, and include both MSA and non-MSA (rural) areas. In selecting these assessment areas, we desired a cross representation of the bank's assessment areas and considered such factors as the income levels of the assessment area's geographies, and the bank's market presence as reflected by its lending and deposit activity. The Cincinnati, OH and Louisville, KY multistate MSAs were the remaining full-scope areas.

For these full-scope assessment areas, we verified and validated performance data, such as investment activity, and conducted outreach activities, where possible, to determine assessment area needs and opportunities. We also compared and analyzed bank performance activity to available demographic information, such as the number

of home mortgages originated by the bank in a particular assessment area—s various income geographies, primarily low and moderate, to the level of owner-occupied housing units in these geographies. This allowed us to measure and evaluate the bank—s performance in the context of the particular circumstances present in each assessment area. Performance in the limited-scope assessment areas was compared to the relative performance of the full-scope assessment areas.

The following table highlights the full- and limited-scope assessment areas. Full-scope assessment areas represent a significant portion of the bank—s operations, comprising 55% of the total geographies within which the bank operates, 60% of the bank—s branches, and 65% of its deposits. Deposit information for June 30, 1998 is shown in the table as it was the most recent.

Star Bank Assessment Areas					
Assessment Areas:	Geographies	% LMI	Total Branches	Deposits (000's)	% of Deposits (6/30/98)
<b>Cincinnati, OH-IN-KY MSA</b>	358	22%	89	\$3,621,279	34%
<b>Louisville, KY-IN MSA</b>	196	33%	22	\$923,753	9%
<b>INDIANA</b>					
<b>Full Scope</b>					
<b>Eastern Indiana</b>	34	21%	14	\$336,422	3%
<b>KENTUCKY</b>					
<b>Full Scope</b>					
<b>MSA 5990 Owensboro</b>	21	19%	7	\$305,066	3%
<b>Central Kentucky</b>	40	8%	8	\$239,270	2%
<b>Limited Scope</b>					
MSA 2440 Evansville-Henderson	11	27%	1	\$29,475	<1%
MSA 4280 Lexington	69	32%	4	\$203,194	2%
Combined Non-urban AAs	24	4%	3	\$47,854	<1%
<b>OHIO</b>					
<b>Full Scope</b>					
<b>MSA 1680 Cleveland-Lorain-Elyria</b>	694	33%	52	\$1,903,050	18%
<b>Fayette County</b>	7	29%	1	\$76,127	1%
<b>Limited Scope</b>					
MSA 0080 Akron	148	32%	17	\$288,116	3%
MSA 1320 Canton-Massillon	75	27%	1	\$32,665	<1%
MSA 1840 Columbus	300	36%	35	\$995,854	9%
MSA 2000 Dayton-Springfield	244	28%	28	\$553,929	5%
MSA 3200 Hamilton-Middletown	73	34%	16	\$367,954	3%

Star Bank Assessment Areas					
MSA 3400 Huntington-Ashland	14	21%	5	\$172,933	2%
MSA 9320 Youngstown-Warren	74	43%	1	\$21,510	<1%
Combined Non-urban AAs	68	31%	19	\$622,769	6%

### Community Contacts

During the examination, we made 19 community contacts. Those contacted included other regulatory agencies and individuals and groups suggested by the bank. These contacts ranged from local governmental agencies to small community-focused organizations. Also, we sent several letters to community representatives to provide a broader range of outreach to the many communities the bank serves. These letters solicited information on specific community needs and Star Bank's CRA performance. The most predominant needs identified were for affordable housing, general consumer loans, and small business loans. In terms of services, the contacts most frequently highlighted counseling for new home buyers and credit counseling. The bank has developed credit products and community development services to meet these needs, and we discuss the bank's success under the state and multistate MSA comments.

## Fair Lending Review

We examined for compliance with the Equal Credit Opportunity Act (ECOA) and the Fair Housing Act subsequent to this CRA examination. We reviewed the bank's policies and procedures and conducted testing to check for any areas of noncompliance. Our testing included a comparative file review of a sample of various loan products. We tested for discrimination based on race or color, religion, national origin, sex, marital status, age, receipt of income from any public assistance program, and the exercise of any right under the Consumer Credit Protection Act. We specifically reviewed 295 conventional, residential real estate applications. The sample also included specialized home lending products, such as those loans originated under the bank's HAP, which has flexible underwriting standards. We focused on purchase-money applications received between January 1, 1997 and March 30, 1998, and compared the bank's underwriting practices between white and black applicants.

Based on the sample of files reviewed, we did not detect discriminatory underwriting practices. The bank's policies, internal controls and training are adequate to ensure ongoing compliance with fair lending laws.

## CINCINNATI, OH MULTISTATE MSA RATING

**CRA Rating for the MSA:**                    **Outstanding**

**The lending test is rated:**                    **Outstanding**

**The investment test is rated:**                **High Satisfactory**

**The service test is rated:**                    **Outstanding**

The major factors that support this rating include:

- ! The bank's variety of credit products is an excellent response to the credit needs of the assessment area.
- ! The bank's geographic distribution of home loans and small business loans show an excellent penetration throughout the various geographies of the MSA.
- ! The distribution of home loans to borrowers of different income levels is adequate to low-income families, but excellent to moderate-income families.
- ! The distribution of small business loans to businesses of different sizes is good.
- ! The level of community development lending is excellent.
- ! The volume of qualified investments is good and responsive to the MSA's community development needs.
- ! The bank's delivery systems are accessible to all portions of the assessment area, including LMI areas, and the provision of community development services is excellent.

### **Description of Institution's Operations in the MSA**

The bank's operations in this multistate MSA include the Ohio portion (Clermont, Hamilton, and Warren Counties), the Northern Kentucky portion (Boone, Campbell, Kenton and Pendleton Counties), and the Indiana portion (Dearborn County).

The following table provides basic MSA demographic data by geography income level.

Demographic Information for Full-Scope Area: Cincinnati, OH-IN-KY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	358	11	19	46	24	0
Population by Geography	1,464,681	7	15	50	28	0
Owner-Occupied Housing by Geography	349,207	2	12	53	33	0
Businesses by Geography	49,951	7	14	49	29	1
Farms by Geography	1,073	3	9	61	27	0
Family Distribution by Income Level	385,901	6	14	52	28	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	142,636	13	23	51	13	0
Median Family Income = \$36,658		Median Housing Value = \$72,731				
HUD Adjusted Median Family Income for 1997 = \$48,400		Unemployment Rate (June 30, 1998) = 2.8%				
Households Below the Poverty Level = 12%						

Source: 1990 U.S. Census and 1997 HUD updated MFI.

There are 552,510 households residing in the MSA, of which 23.9% are low-income and 15.7% are moderate-income. Of the households in the MSA, 12% are below the poverty level. The overall economy of the MSA is strong, and the unemployment rate has been low near 2.8%, as of June 1998. Cincinnati is an important distribution point for raw materials, such as coal and lumber shipped by river barge and rail. Products manufactured in Cincinnati include aircraft engines, auto parts, processed food, metalworking and fabricated metal products, industrial machinery, soap products, chemicals, and printed materials. The city also is home to several federal government regional offices.

To determine community credit needs and opportunities, we reviewed available information prepared by government entities, such as HUD Consolidated Plans for the MSA. We also conducted several community contacts throughout the MSA. From the viewpoint of the majority of the contacts, affordable housing is the area of greatest need/opportunity in the MSA. The supply of affordable housing is insufficient and typically in need of rehabilitation. Specifically, the very low-income segment of the population is in need of housing rehabilitation and rental assistance. We found the following needs most frequently mentioned:

- C There is a lack of access to financial services in low- and moderate-income neighborhoods.
- C There is a need for small business initiatives and small business funding (most of Cincinnati's funding assistance for the community involves housing initiatives).
- C There is a need for very small loans to businesses.
- C There is a need for mixed income development.
- C Cincinnati neighborhoods need more home improvement loans.
- C Costly rent-to-own businesses do a large business in inner city areas, and banks could help by making affordable consumer loans readily available.



- C School children in the inner-city neighborhoods of Cincinnati would benefit greatly from bank-at-school programs.
- C Venture and working capital for small and minority businesses is needed.
- C There is a need for affordable housing loans.

## LENDING TEST

### Lending Activity

The bank offers a variety of lending products that are responsive to local credit needs. The total dollar amount of home and small business loans originated in Cincinnati represents 28% of similar loans originated by the bank in all areas. Refer to Table 1, Appendix B, for detail on lending volumes.

### Home Loans

During 1996 and 1997, the bank originated 8,162 home loans totaling more than \$405 million. There are no unexplained gaps in the geographic distribution. The bank originated home loans in a substantial majority of low- and moderate-income geographies.

#### Home Purchase Loans

During 1996 and 1997, the bank originated 1,759 home purchase loans. To analyze the geographic distribution of loans, we compared the bank's distribution of home purchase loans originated or purchased in low- and moderate-income geographies to the respective proportion of owner-occupied housing units in each of these geographies. We also determined the bank's market share within each income geography and in the market as a whole using aggregate market data for 1996. The quantitative data relating to our analysis is found in Table 2, Appendix B. We also used this same analysis method for home improvement and home mortgage refinance loans in each of the bank's assessment areas.

The bank's geographic distribution of home purchase loans is excellent in low-income geographies as it equals the percentage of owner-occupied housing (2%) units in these areas. In moderate-income geographies, the bank's performance is good since the percentage of bank loans is slightly less than the percentage of owner-occupied housing units in those geographies (10% vs. 12%). Additionally, the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall market share. In combination, the geographic distribution of home purchase lending in low- and moderate-income geographies in the MSA is excellent.

To analyze the distribution of home purchase loans by borrower income level, we compared the distribution of home purchase loans originated or purchased by the bank to families of different income levels to the respective proportion of families based on their income level. We also determined the bank's market share within each family income level and in the market as a whole using aggregate market data for 1996. The quantitative data relating to our analysis is found in Table 7, Appendix B. We also used this same analysis method for home improvement and home mortgage refinance loans in each of the bank's assessment areas.

The distribution of home purchase loans to low-income borrowers (12%) is adequate when compared to the percentage of the low-income borrowers in the assessment area (20%). The bank's market share to low-income families substantially exceeds its overall market share (5.8% vs. 2.9%). For home purchase lending to moderate-income families, the bank's distribution exceeds the percentage of moderate-income families (23% vs. 17%) and is excellent. Likewise, the bank's market share to moderate-income borrowers exceeds its overall market share (3.5% vs. 2.9%). In combination, the borrower distribution of home purchase loans in low- and moderate-income geographies is good.

### Home Improvement Loans

During 1996 and 1997, the bank originated 3,545 home improvement loans. Data relating to our analysis is found in Table 3, Appendix B.

The bank's geographic distribution of home improvement loans is excellent in both low- and moderate-income geographies since the percentage of bank loans exceeds the percentage of owner-occupied housing units, especially in moderate-income geographies where it significantly exceeds that percentage. Additionally, the bank's market share in low-income geographies is slightly less than its overall market share (15.6% vs. 17.8%) and is good. In moderate-income geographies, the bank's market share significantly exceeds its overall market share (22.8% vs. 17.8%). In combination, the geographic distribution of home improvement loans is excellent.

The distribution of home improvement loans to borrowers of different income levels (See Table 8, Appendix B) is adequate as the percentage of bank loans to low-income families (14%) is significantly less than the percentage of low-income families (20%). However, this is enhanced by the bank's market share of loans (20.9%) significantly exceeding its overall market share (17.8%). For home improvement lending to moderate income families, the bank's distribution significantly exceeds the percentage of moderate-income families (23% vs. 17%) and is excellent. Likewise, the bank's market share (18.7%) exceeds the bank's overall market share (17.8%). In combination, the distribution of home improvement lending is good.

### Home Mortgage Refinance Loans

During 1996 and 1997, the bank originated 2,825 home mortgage refinance loans. The quantitative data relating to our analysis is found in Table 4, Appendix B.

The bank's geographic distribution of home mortgage refinance loans in low-income geographies is excellent as the percentage of bank loans made in these geographies equals the percentage of owner-occupied housing units (2%) and its market share in these areas exceeds its overall market share (5.5% vs. 5.4%). In moderate-income geographies the distribution of the bank's loans is good considering that 11% of the bank's home mortgage refinance loans is slightly less than the percentage of owner-occupied housing units (12%). However, this conclusion is enhanced by the bank's market share of loans in moderate-income areas exceeding its overall market share (5.5% vs. 5.4%). In combination, the geographic distribution of home mortgage refinance loans is excellent.

The distribution of home mortgage refinance loans to borrowers of different income levels (See Table 9, Appendix B) shows the percentage of bank loans to low-income families (10%) is adequate as it is half of the percentage of low-income families (20%). However, the bank's market share of loans (6.6%) significantly exceeds its overall market share (5.4%). For home mortgage refinance lending to moderate-income families, the bank's distribution significantly exceeds the percentage of moderate-income families (21% vs. 17%) and is excellent. Likewise, the bank's market share (6.4%) significantly exceeds the bank's overall market share (5.4%). In combination, the borrower distribution of home mortgage refinance loans is good.

### Multi-family Home Loans

While the geographic distribution is not reflected in a specific table the bank made 33 multi-family home loans during the evaluation period. Twenty-one percent of these were made in low-income geographies and 24% in moderate-income geographies.

### **Small Business and Community Development Lending**

In 1997, the bank originated 1,187 small loans to businesses for a total of \$153.6 million. Aggregate 1997 market data for all reporting institutions, ranks the bank the 5th largest small business lender in the assessment area. Significant competition for small business lending is centered in the leading lenders, Mountainwest Financial Corporation, Fifth Third Bank of Cincinnati and American Express.

In analyzing the geographic distribution of small loans to businesses, we compared the distribution of bank loans within low- and moderate-income geographies to the distribution of businesses within these geographies. We also determined the bank's market share within each income geography and in the market as a whole using aggregate market data for 1997. The quantitative data relating to our analysis is found in Table 5, Appendix B. We used this same analysis method in each assessment area.

The bank's geographic distribution of small loans to businesses in low-income geographies is excellent with 7% of bank loans made in these areas compared to 7% of all such businesses in these areas. Additionally, the bank's market share of small loans to businesses exceeds the bank's overall market share of small loans to businesses (10.1% vs. 9.1%). The bank's distribution of small loans to businesses in moderate-income geographies is good with 11% of the bank's loans made in these areas compared to 14% of all such businesses in these areas. This is further supported by the bank's market share of small loans to businesses in moderate-income geographies being slightly less than its overall market share for small loans to businesses (8% vs. 9.1%). In combination, the geographic distribution of small loans to businesses is good.

To analyze the distribution of small loans to businesses based on size of the business, we compared the percentage of bank loans made to businesses having revenues less than \$1 million to the percentage of businesses considered small businesses. We also compared the percentage of bank loans made to small businesses to the percentage of loans all lenders made to small businesses in the assessment areas. Additionally, we determined the bank's market share of small loans to businesses based on aggregate 1997 market data, and the bank's market share of loans to small businesses. The quantitative data is found in Table 10, Appendix B. We used this same analysis method in all assessment areas.

The bank's distribution of small business loans to small businesses is good. Approximately 68% of the number of small loans to businesses the bank made are to small businesses which is slightly less than the number of all small businesses (71%) in the assessment area. Also, the bank's distribution exceeds the aggregate market, which shows 43% of all small loans to businesses being made to small businesses. To further support this conclusion, the bank's market share of small business loans to small businesses is 13.7% which significantly exceeds its overall 9.1% market share.

The bank originated an excellent level of community development loans, with 16 loans totaling \$17.9 million made during the evaluation period. Most of the community development lending is related to housing for low- and moderate-income people. Due to their small size and reporting requirements, many other community development-related loans were reported by the bank as small loans to businesses.

## Investment Test

The bank's qualified investment activity in the MSA shows good responsiveness to community development needs. Quantitative data relating to qualified investments is found in Table 12, Appendix B.

The bank has invested a total of \$8.3 million in the MSA. During the CRA evaluation period, the bank made direct investments in one low-income housing tax credit project, one community development financial institution, and four equity funds. Additionally, when crediting the portion of the statewide equity funds that are attributable to the Cincinnati MSA, current evaluation period investments total \$2.0 million. The bank also made five direct investments in low-income housing tax credit projects located in the Cincinnati market prior to the CRA evaluation period, which have balances outstanding.

While the volume of investments is significant, none of the investments are considered innovative or complex and are routinely made by other private investors. Additionally, the bank also provided grants and contributions of \$707,000 to organizations meeting the definition of community development.

Examples of investments in the Cincinnati MSA include the following:

### Cincinnati Equity Fund I, II, and III

The Funds have provided investment dollars to:

- C Rehabilitate 206 studio, family and elderly units located in 35 buildings in the Over-the-Rhine neighborhood. The units will house a cross section of the city's poor, including homeless, elderly and very low-income individuals and families. Unit rents will be affordable to individuals and families with incomes less than 40% of the median income (*Prior period - North Rhine I & II and Franciscan Homes II & III*);
- C Rehabilitate 89 multifamily units in the Walnut Hill neighborhood. The project will contain 24 one-bedroom and 65 two-bedroom units. Rents are affordable for families earning between 28% and 46% of the median income (*Lincoln Terrace Apts*); and,

- C Construct 14 single family homes in the West College Hill area and 11 town homes in the East Riverfront area. All rents are affordable to families with incomes less than 40% of the median income (*Prior period - College Park and Lewistown Town homes*).

Ohio Equity Fund for Housing IV, V, and VI

These statewide Funds have provided investment dollars to:

- C Construct seven two-story buildings containing 28 three bedroom townhouse units and 14 three bedroom flats. All of the units are affordable to families at or below 50% of the median family income (*Prior period OEF V - Colony Woods*);
- C Rehabilitate 55 housing units located in an inner city neighborhood. Forty of the units will be renovated into two bedroom apartments. The remaining units will be one, three, and four bedroom units. All of the units are affordable to families at or below 60% of the median family income (*Prior period OEF IV - Pendleton*); and,
- C Construct four buildings and rehabilitate six that will house 36 units located in an inner city neighborhood. Twenty of the units will consist of two bedroom apartments with the remainder constructed as efficiencies, one, three, or four bedroom units. All units will be affordable to low-income households (*OEF VI - Sharp Village*).

National Equity Fund

The Fund has provided investment dollars to develop one 24-unit apartment complex. The units are affordable, meeting the low-income tax credit requirements (*Neaves Street Apts*).

**Service Test****Retail Banking Services**

The bank offers a variety of services and products throughout the MSA. The types of services include conveniently placed bank branches and full service ATMs, 24 hour Telephone Banking, Bank by Mail, PC Banking and Internet Banking. While not specifically developed for LMI individuals, many of these services address their needs.

Eighty-nine branches and 182 ATMs provide ready access to bank offered financial services. Most branches offer extended evening and weekend banking hours. The distribution of the bank's branches in low-income geographies is 5% compared to 7% of the population residing in these areas. In moderate-income geographies, 12% of the bank's branches are located there compared to 15% of the population residing there. Additionally, 6% of the bank's ATMs are located in low-income geographies compared to 7% of the population residing in these areas, while 10% are located in moderate-income geographies compared to 15% of the population residing in these areas. The bank's record of opening and closing branches in the MSA has resulted in increased availability of services to the LMI community. Although one branch was closed in a low-income geography, two were opened in low-income geographies since the last evaluation period. The closed branch resulted from the consolidation of offices after a bank acquisition. Data relating to bank branches and ATMs is found in Table 13, Appendix B.

**Community Development Services**

The bank and its employees provide an extensive amount and variety of community development services throughout the MSA. Technical assistance for small business owners, home ownership counseling services, and access to financial services are examples of primary areas of involvement. The bank's employees serve on the Boards of, and provide their technical expertise to, a number of organizations directly involved in providing community development services, including much needed educational opportunities. The bank's performance is excellent since these services respond very well to the service needs of the MSA.

## LOUISVILLE, KY MULTISTATE MSA RATING

**CRA Rating for the MSA:** **Satisfactory**

**The lending test is rated:** **Low Satisfactory**

**The investment test is rated:** **Outstanding**

**The service test is rated:** **Low Satisfactory**

The major factors that support this rating include:

- ! The variety of credit products offered by the bank is an adequate response to the credit needs of the MSA.
- ! The geographic distribution of home loans is adequate, while the geographic distribution of small business loans is good.
- ! The distribution of home loans to borrowers of different income levels is adequate, while the distribution of small business loans to small businesses is excellent.
- ! The bank has an excellent volume of qualified investments that are responsive to community development needs.
- ! The bank's delivery systems are accessible to all portions of the assessment area, including LMI areas.

### **Description of Institution's Operations in the MSA**

The bank's operations in this multistate MSA include the Kentucky portion (Jefferson County), and the Indiana portion (Floyd County). These operations were acquired by Star Bank as a result of its February 1998, acquisition of Great Financial Corporation, Louisville, Kentucky.

Accordingly, the CRA activities of the former Great Financial Corporation are included in this Performance Evaluation, but these new assessment areas located in Kentucky and the Louisville, KY multistate MSA have been under the management of Star Bank for less than sixty (60) days of the period encompasses by this examination.

The following table provides basic demographic data concerning the MSA by income level of the geographies.



Demographic Information for Full-Scope Area: Louisville, KY-IN Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	196	11	22	39	27	1
Population by Geography	729,341	8	19	42	31	0
Owner-Occupied Housing by Geography	187,673	4	16	45	35	0
Businesses by Geography	26,553	8	23	35	34	0
Farms by Geography	484	2	14	45	39	0
Family Distribution by Income Level	198,759	21	17	22	40	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	75,719	15	29	42	14	0
Median Family Income = \$32,975		Median Housing Value = \$61,373				
HUD Adjusted Median Family Income for 1997 = \$42,700		Unemployment Rate (June 30, 1998) = 3.3%				
Households Below the Poverty Level = 13%						

Source: 1990 U.S. Census and 1997 HUD updated MFI.

There are 287,880 households residing in the MSA, of which 24.7% are categorized as low-income and 15.7% as moderate-income. Of the households in the MSA, 13% are below the poverty level. The overall economy of the MSA is strong. According to the U.S. Census Bureau, the retail and manufacturing sectors dominate the employment market in the Louisville MSA, providing 27% and 24% of all jobs, respectively. Large employers in the area include a Ford Motor Company assembly plant, a United Parcel Service facility, and the University of Louisville. Also, a number of hospitals near downtown Louisville are increasing the importance of the health care industry to the city. Louisville is also the home to the Hillerich and Bradsby Company (manufacturer of baseball bats), and the corporate headquarters of Kentucky Fried Chicken. Churchill Downs, the site of the annual Kentucky Derby, is also located in Louisville.

In order to determine community credit needs and opportunities, we reviewed available information prepared by government entities, such as HUD Consolidated Plans for the MSA. The most pressing needs are for affordable housing, small business lending, and banking services in LMI areas.

## LENDING TEST

### Lending Activity

The bank offers a variety of lending products responsive to local credit needs. The total dollar amount of home and small business loans originated in Louisville represents 16% of similar loans originated by the bank in all areas. Refer to Table 1, appendix B, for detail on lending volumes.

## Home Loans

During 1996 and 1997, the bank originated 2,846 home loans totaling more than \$245 million. There are no unexplained gaps in the geographic distribution of home loans. The bank originated home loans in a substantial majority of low- and moderate-income geographies.

### Home Purchase Loans

During 1996 and 1997, the bank originated 1,569 home purchase loans. The quantitative data relating to our analysis is found in Table 3, Appendix B.

The bank's geographic distribution of home purchase loans in low-income geographies is good. The percentage of bank loans in low-income geographies is less than the percentage of owner-occupied housing units (3% vs. 4%). The bank's market share of home purchase loans in low-income geographies significantly exceeds its overall market share (8.7% vs. 5.2%). In moderate-income geographies, the bank's performance is also good since the percentage of the bank's loans is slightly less than the percentage of owner-occupied housing units in those geographies (13% vs. 16%). The bank's market share also exceeds its overall market share in moderate-income geographies (6.1% vs. 5.2%). In combination, the geographic distribution of home purchase loans in low- and moderate-income geographies is good.

Our analysis of the distribution of home purchase loans to borrowers of different income levels (See Table 7, Appendix B) shows the percentage of bank loans to low-income families is poor as the percentage of bank loans (6%) is substantially less than the percentage of low-income families (21%). However, this conclusion is slightly enhanced by the bank's market share of loans compared to the bank's aggregate market share being slightly less than the bank's overall market share (4.2% vs. 5.2%). In analyzing home purchase lending to moderate-income families, the bank's distribution significantly exceeds the percentage of moderate-income families (23% vs. 17%), which is excellent. Additionally, the bank's market share (7.5%) significantly exceeds the bank's overall market share (5.2%). In combination, the borrower distribution of home purchase loans to low- and moderate-income borrowers is good.

### Home Improvement Loans

During 1996 and 1997, the bank originated 294 home improvement loans. Quantitative data relating to our analysis is found in Table 3, Appendix B.

The bank's geographic distribution of home improvement loans is poor in low-income geographies since it is substantially less than the percentage of owner-occupied housing units in those areas (2% vs. 4%). Likewise, the bank's market share of home improvement loans in low-income geographies is substantially less than the bank's overall market share (1.6% vs. 3.9%). In moderate-income geographies, the bank's performance is excellent with the percentage of bank loans exceeding the percentage of owner-occupied housing units in these geographies (19% vs. 16%). Additionally, the bank's market share of home improvement loans in moderate-income geographies is excellent as the bank's market share in these geographies exceeds its overall market share of home

improvement loans (4% vs. 3.9%). In combination, the geographic distribution of home improvement loans in low- and moderate-income geographies is adequate.

Our analysis of the distribution of home improvement loans to borrowers of different income levels (See Table 8, Appendix B) shows the percentage of bank loans to low-income families is poor as the percentage of bank loans (12%) is substantially less than the percentage of low-income families (21%). However, this conclusion is enhanced by the bank's market share of loans (3.8%) being slightly less than its overall market share (3.9%). In analyzing home improvement lending to moderate-income families, the bank's distribution substantially exceeds the percentage of families considered to be moderate-income (25% vs. 17%), which is excellent. Additionally, the bank's market share (4.9%) significantly exceeds the bank's overall market share (3.9%), which is also excellent. In combination, the borrower distribution of home improvement loans to low- and moderate-income borrowers is good.

### Home Mortgage Refinance Loans

During 1996 and 1997, the bank originated 972 home mortgage refinance loans. Quantitative data relating to our analysis is found in Table 4, Appendix B.

The bank's geographic distribution of home mortgage refinance loans in low-income geographies is adequate as the percentage of bank loans (3%) in these geographies is less than the percentage of owner-occupied housing units (4%), but its market share in these areas slightly exceeds its overall market share (4.3% vs. 4.1%). In moderate-income geographies, the distribution of bank loans is poor considering 9% of the bank's home mortgage refinance loans made is significantly less than the percentage of owner-occupied housing units (16%). Also, the bank's market share of home mortgage refinance loans is also significantly less than the bank's overall market share (2.4% vs. 4.1%). In combination, the geographic distribution of home mortgage refinance loans in low- and moderate-income geographies is adequate.

Our analysis of the distribution of home mortgage refinance loans to borrowers of different income levels (See Table 9, Appendix B) shows the percentage of bank loans to low-income families is poor as the percentage of the bank's loans (4%) is substantially less than the percentage of low-income families (21%). To further support this finding, the bank's market share of home mortgage refinance loans is 1.5% compared to its overall 4.1% market share. In analyzing home mortgage refinance lending to moderate-income families, the bank's distribution is significantly less than the percentage of moderate-income families (12% vs. 17%), which is adequate. Likewise, the bank's market share (2.9%) is significantly less than the bank's overall market share (4.1%). In combination, the borrower distribution of home mortgage refinance loans to low- and moderate-income borrowers is adequate.

### Multi-family Home Loans

While the geographic distribution is not reflected in a specific table the bank made 11 multi-family home loans during the evaluation period. One of these was made in a low-income geography. All 11 are considered community development loans.

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## Small Business and Community Development Lending

In 1997, the bank originated 182 small business loans for a total of \$28.1 million. Aggregate 1997 market data for all reporting institutions, ranks the bank the 14th largest small business lender in the assessment area. Significant competition for small business lending is centered in the leading lenders, PNC Bank, N.A., Bank One Kentucky, N.A., Mountainwest Financial Corporation, Stock Yards Bank & Trust Co., National City Bank of Kentucky, and American Express.

As shown in Table 5, Appendix B, the bank's geographic distribution of small loans to businesses is good. The bank's small loans to businesses in low-income geographies is adequate with 4% of the bank's loans made in these areas compared to 8% of all such businesses in these areas. Additionally, the bank's market share of small loans to businesses is less than the bank's overall market share of small loans to businesses (1.2% vs. 1.7%). The bank's small loans to businesses in moderate-income geographies is good with 23% of the bank's loans made in these areas compared to 23% of all such businesses in these areas. This conclusion is slightly enhanced by the bank's market share slightly exceeding its overall market share (1.8% vs. 1.7%).

Table 10, Appendix B, shows the distribution of small loans to businesses of different revenue levels is excellent. Approximately 93% of the number of small loans to businesses made by the bank are to small businesses. This significantly exceeds the assessment area's percentage of all businesses considered small (69%). The bank's distribution exceeds the aggregate market data, which shows 37% of all small loans to businesses being made to small businesses. Additionally, the bank's market share of small loans to small businesses is more than double its overall market share of small loans to businesses.

The bank made 11 community development loans in this assessment area. Also, several of the loans reported as loans to small businesses were made for community development purposes.

## INVESTMENT TEST

The bank's investment activity and responsiveness to community development needs in the MSA are excellent. Investment performance in the MSA is stronger than the bank's overall investment performance. Quantitative data relating to qualified investments is found in Table 12, Appendix B.

The bank has invested a total of \$5.1 million in the MSA. During the CRA evaluation period, the bank made direct investments of \$1.8 million in three low-income housing tax credit projects. The projects developed 87 affordable housing units in the MSA. Seven additional low-income housing tax credit investments, totaling \$3.1 million, were made prior to the evaluation period and remain outstanding. Those projects developed 190 affordable housing units. However, generally, none of the investments are considered innovative or complex and are routinely made by other private investors. The bank also provided grants and contributions of \$19,000 to community development organizations in the MSA.

## **SERVICE TEST**

### **Retail Banking Services**

A variety of services and products are offered throughout the MSA. These services include an expansive network of bank branches and full service ATMs, 24 hour Telephone Banking, Bank by Mail, PC Banking and Internet Banking. While not specifically designed for LMI individuals, many of these services do address their needs. Information relating to bank branches and ATMs is found in Table 13, Appendix B.

Twenty-two branches and 50 ATMs provide ready access to bank offered financial services. Most of the branches offer extended evening and weekend banking hours. The bank's distribution of branches in low-income geographies is 5% compared to 8% of the population residing in these areas. Twenty-seven percent of the bank's branches are in moderate-income geographies compared to 19% of the population residing there. Five percent of the bank's ATMs are located in low-income geographies compared to 8% of the population residing in these areas. Also, 24% of the bank's ATMs are located in moderate-income geographies compared to 19% of the population residing there. The bank has not opened or closed branches in LMI geographies since the last CRA evaluation period.

### **Community Development Services**

The bank provides an adequate level of community development services throughout the MSA. Technical assistance for home buyers is an example of the services offered.

The bank's performance under the Service Test is adequate.

## OHIO STATE RATING

**CRA Rating for Ohio:**                    **Satisfactory**

**The lending test is rated:**                **High Satisfactory**

**The investment test is rated:**            **High Satisfactory**

**The service test is rated:**                **High Satisfactory**

The major factors that support this rating include:

- ! Overall, the bank's responsiveness to community credit needs is good.
- ! Geographic distribution of home loans among the assessment areas is good.
- ! The overall distribution of home loans by borrower income level is generally adequate in connection with low-income borrowers, but is excellent for moderate-income borrowers.
- ! The bank offers two flexible home loan products for low- and moderate-income borrowers, both under the bank's HAP program.
- ! Overall, geographic distribution of small loans to businesses located in LMI geographies is adequate among the assessment areas. The overall distributions of small loans to small businesses is good.
- ! The bank originated approximately \$4.0 million in total qualified community development loans in Ohio.
- ! Home and small business lending performance in the Cleveland-Lorain-Elyria MSA is excellent.
- ! Home and small business lending performance in the Akron MSA is stronger than the state's overall lending performance. One community development loan totaling \$322,000 was originated in this MSA during the evaluation period.
- ! Home lending performance in the Canton-Massillon MSA is stronger, and small business lending is consistent with the state's overall lending performance. This performance affects but does not change the state's overall lending rating primarily because the bank had such a low volume of home and small business lending in this area.
- ! In the Columbus, Dayton-Springfield and Huntington-Ashland MSA, home lending performance is weaker than, and small business lending is consistent with the state's overall lending performance. One qualified community development loan totaling \$1.5 million was originated in the Dayton-Springfield MSA.
- ! Overall, home and small business lending performance in the Hamilton-Middletown MSA and the non-urban areas of Ohio, such as Fayette County, is weaker than the state's overall lending performance.

- ! In the Youngstown-Warren MSA, home and small business lending performance is also weaker than the state's overall lending performance. However, the bank recently entered this market by acquiring one branch located in Fayette County and the assessment area is one of its smallest.
- ! The bank has made a good level of qualified investments within the state of Ohio. These investments are concentrated in the Cleveland and Columbus MSAs and the non-urban areas of the State.
- ! The bank's services are accessible to all geographies in the bank's assessment areas. Community development services are good in the state overall.

### **Description of Institution's Operation in Ohio**

Excluding the Cincinnati, Ohio multistate MSA, the bank's assessment areas in the state include all or portions of eight MSAs, those being Akron, Canton-Massillon, Cleveland-Lorain-Elyria, Columbus, Dayton-Springfield, Hamilton-Middletown, Huntington-Ashland, and Youngstown-Warren. In addition to these MSAs, the bank has designated all or portions of seven non-urban counties within its assessment areas. The counties included in these non-urban areas are Darke, Fayette, Gallia, Highland, Preble, Scioto, and Shelby.

Star Bank operates 175 branches and 349 ATMs in the state. While the bank's competitors vary by assessment area, major bank competitors include Bank One, Fifth Third Bank, Huntington National Bank, Key Bank, and National City. Additionally, there are certain areas where local community banks provide very strong competition.

Various community contacts were made during this examination, and additional information was gathered from contacts done by other regulators. The predominant credit and service needs in the assessment areas are easier funding for small businesses, small business technical assistance, home buyer education, and more affordable housing for rental/purchase.

### **Scope of Review**

The bank's performance in the state was based on an evaluation of lending, investment and service activities in all state assessment areas, excluding that part of the state in the Cincinnati multistate MSA. Of the eight assessment areas within the state, we selected the Cleveland-Lorain-Elyria MSA and Fayette County (a non-MSA) for full-scope review. In making this determination, we relied on several factors including income levels of the assessment area geographies and the bank's market presence as defined by its lending activities and deposit levels. A detailed discussion of these assessment areas is included in this section. All other assessment areas within the state received a limited-scope review. Since Star Bank entered the Youngstown-Warren market in February 1998, performance in this area did not impact the state's overall lending rating.

## LENDING TEST

### Lending Activity

The bank offers a variety of lending products responsive to local credit needs. The total dollar amount of home and small business loans originated within the State represents 46% of similar loans originated by the bank in all areas. Refer to Table 1, Appendix B, for detail on lending volumes.

### Conclusions for Assessment Areas Receiving Full- and Limited-Scope Reviews

The bank's performance under the Lending Test in Ohio is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Cleveland-Lorain-Elyria MSA is excellent, and in Fayette County it is adequate.

Based on Limited-Scope reviews, the bank's performance in the Akron MSA is better than the State rating. In the Canton-Massillon MSA the bank's home lending performance is stronger than the State rating, but small business lending performance is consistent with the State rating. In the Columbus, Dayton-Springfield, and Huntington-Ashland MSAs, the bank's home lending performance is weaker than the State rating, but small business lending performance is consistent with the State rating. In Hamilton-Middletown, Huntington-Ashland, Youngstown-Warren and the non-urban areas the bank's lending performance is weaker than the State rating.

### Home Loans

The bank originated 13,214 home loans totaling more than \$625 million during 1996 and 1997 within the State. There are no unexplained gaps in the geographic distribution of home loans. The bank originated home loans in a substantial majority of low- and moderate-income geographies.

#### Home Purchase Loans

The bank's geographic distribution of home purchase loans in the State is good. This is based on the quantitative data found in Table 2, Appendix B, which shows that in low-income geographies:

In the Cleveland-Lorain-Elyria and Akron assessment areas, the percentage of bank loans and the bank's market share exceed the demographic data and the bank's overall market share percentage. This demonstrates excellent performance.

In the Columbus and Hamilton-Middletown assessment areas, the percentage of bank loans is less than the percentage of owner-occupied housing units, but the bank's market share in these areas exceeds its overall market share. This demonstrates good performance.

In Dayton-Springfield and the non-urban areas, the percentage of bank loans is substantially less than the percentage of owner-occupied housing units, and the bank's market share in these areas is less than its overall market share. This demonstrates poor performance.



In the Canton-Massillon and Youngstown-Warren assessment areas, the bank made no loans in low-income geographies. This is consistent with poor performance although in each of these areas the bank had a very low lending volume.

In the Fayette County and Huntington-Ashland assessment areas there are no low-income geographies.

For moderate-income geographies, the data reflect:

In Cleveland-Lorain-Elyria, Akron, Canton-Massillon, and Dayton-Springfield assessment areas, the percentage of bank loans exceeds the percent of owner-occupied housing units. Additionally, in each of these areas, the bank's market share equals or exceeds its overall market share. This demonstrates excellent performance.

In Fayette County, the percentage of bank loans exceeds the percentage of owner-occupied housing units, but its market share is less than its overall market share percentage. This indicates good performance although the bank has a low volume of home purchase loans in the area.

In the Hamilton-Middletown and Huntington-Ashland assessment areas, the percentage of bank loans is less than the percentage of owner-occupied housing units, but its market share exceeds its overall market share which demonstrates good performance.

In the Columbus and non-urban assessment areas, the percentage of bank loans is significantly less than the percentage of owner-occupied housing units and its market share is less than its overall market share. This demonstrates adequate performance.

In the Youngstown-Warren assessment area, the bank made no loans in moderate-income geographies which reflects poor performance. However, the bank recently entered this market by acquiring one branch located in Fayette County and the assessment area is one of its smallest.

Our analysis of the distribution of home purchase loans to borrowers of different income levels (See Table 7, Appendix B) shows for lending to low-income families that:

In the Cleveland-Lorain-Elyria assessment area, the percentage of bank loans to low-income families exceeds the percentage of low-income families. Additionally, the bank's market share in this area substantially exceeds its overall market share. This performance is excellent.

In the Akron, Columbus, Dayton-Springfield, Hamilton-Middletown, and Huntington-Ashland assessment areas, the percentage of bank loans is less than the percentage of low-income families, but the bank's market share exceeds its overall market share. This indicates good performance.

In the non-urban assessment areas, the bank's percentage of home purchase loans is substantially less than the percentage of low-income families and its market share is slightly less than its overall market share.

Because the percentage of bank loans is significantly below the percentage of low-income families, performance is poor, despite the close approximation of the bank's market share to its overall market share.

In the Fayette County, Canton-Massillon, and Youngstown-Warren assessment areas, the bank made no loans to low-income families which reflects poor performance. However, the low lending volume in these areas is a mitigating factor.

For lending to moderate-income families the data reflect that:

In the Cleveland-Lorain-Elyria, Akron, Dayton-Springfield, Hamilton-Middletown, Huntington-Ashland and the non-urban assessment areas of Ohio, the percentage of bank home purchase loans exceeds the percentage of moderate-income families in these areas. Additionally, the bank's market share in these areas exceeds, with the exception of the non-urban areas, its overall market share. Within the non-urban areas, the bank's market share is slightly less than its overall market share. This demonstrates excellent performance.

In the Canton-Massillon assessment area, the percentage of bank loans is less than the percentage of moderate-income families, but its market share is equal to its overall market share. This is good performance.

In the Columbus and Youngstown-Warren assessment areas, the percentage of bank loans is less than the percentage of moderate-income families, especially in the Youngstown-Warren area. Additionally, the bank's market share is less than its overall market share, especially in the Columbus area. This demonstrates adequate performance.

In the Fayette County assessment area, no loans were made to moderate-income families which reflects poor performance. However, the bank recently entered this market by acquiring one branch and the assessment area is one of its smallest.

In combination, the borrower distribution of home purchase loans is considered to be good.

### Home Improvement Loans

The quantitative data relating to home improvement loans is found in Table 3, Appendix B. The bank's geographic distribution of home improvement loans in low-income geographies indicates:

In the Canton-Massillon, Columbus and Hamilton-Middletown assessment areas, the percentage of bank loans exceeds the percentage of owner-occupied housing units. Additionally, the bank's market share equals or exceeds its overall market share in these areas. This is excellent performance. The low volume of lending in the Canton-Massillon area did not influence the overall rating for the State.

In the Cleveland-Lorain-Elyria, and Akron assessment areas, the percentage of bank loans exceeds the percentage of owner-occupied housing units. However, the bank's market share is less than its overall market share. This demonstrates good performance.

In the Dayton-Springfield and non-urban areas, the percentage of bank loans is significantly less than the percentage of owner-occupied housing units. Additionally, the bank's market share is less than its overall market share. This demonstrates adequate performance.

In the Youngstown-Warren assessment area, the bank made no loans in low-income geographies, but only recently entered this market.

There are no low-income geographies in the Fayette County or Huntington-Ashland assessment areas.

For moderate-income geographies, the data reflects:

In the Akron, Canton-Massillon, Columbus, Dayton-Springfield and the non-urban assessment areas, the percentage of bank loans exceeds the percentage of owner-occupied housing units. Additionally, the bank's market share substantially approaches or exceeds the bank's overall market share. This demonstrates excellent performance.

In the Cleveland-Lorain-Elyria assessment area, the percentage of bank loans significantly exceeds the percentage of owner-occupied housing units, but its market share is less than its overall market share. In the Huntington-Ashland assessment area, the percentage of bank loans is less than the percentage of owner-occupied housing units, but its market share significantly exceeds its overall market share. These situations demonstrate good performance.

In the Fayette County and Hamilton-Middletown assessment areas, the percentage of bank loans is less than the percentage of owner-occupied housing units. Additionally, in these areas, the bank's market share is less than the bank's overall market share. This is adequate performance.

The bank made no home improvement loans in the Youngstown-Warren area which is poor performance. However, the bank recently entered this market by acquiring one branch located in Fayette County and the assessment area is one of its smallest.

Our analysis of the distribution of home improvement loans to borrowers of different income levels (See Table 8, Appendix B) shows for lending to low-income families that:

In the Cleveland-Lorain-Elyria, Fayette County, and Akron assessment areas the percentage of bank loans is less than the percentage of owner-occupied housing units. However, the bank's market share exceeds its overall market share in these areas. This demonstrates good performance.

In the Columbus, Huntington-Ashland and non-urban assessment areas, the percentage of bank loans is significantly less than the percentage of owner-occupied housing units. In the case of Huntington-Ashland, it

is substantially less than the percentage of low-income borrowers. In each of these areas, the bank's market share equals or exceeds its overall market share. This demonstrates good performance.

In the Dayton-Springfield and Hamilton-Middletown assessment areas, the percentage of bank loans is significantly less than the percentage of owner-occupied housing units and its market share is less than its overall market share. This demonstrates only adequate performance.

In the Canton-Massillon and Youngstown-Warren assessment areas, the bank made no loans to low-income families. This demonstrates poor performance, but the bank only recently entered the Youngstown-Warren market and only made 3 loans in each of these areas.

For home improvement loans to moderate-income families, the data reflects:

In the Akron, Canton-Massillon, Columbus, Dayton-Springfield, Hamilton-Middletown, Huntington-Ashland and the non-urban assessments areas, the percentage of bank home improvement loans exceeds the percentage of owner-occupied housing units. Additionally, the bank's market share in each of these areas significantly approaches or exceeds the bank's overall market share. This demonstrates excellent performance.

In the Cleveland-Lorain-Elyria assessment area, the percentage of bank loans exceeds the percentage of owner-occupied housing units, but its market share is less than its overall market share. In the area of Fayette County the percentage of bank loans is less than the percentage of owner-occupied housing units, but its market share exceeds its overall market share. In each case, this demonstrates good performance. Again, the volume of lending in the Fayette County area was very low.

In the Youngstown-Warren assessment area, the bank made no loans to moderate-income families which demonstrates poor performance. However, the bank recently entered this market by acquiring one branch located in Fayette County and the assessment area is one of its smallest.

### Home Mortgage Refinance Loans

The bank's geographic distribution of home mortgage refinance loans in low-income geographies, shown in Table 4, Appendix B, reflects:

In the Cleveland-Lorain-Elyria and Akron assessment areas, the percentage of bank home mortgage refinance loans exceeds the percentage of owner-occupied housing units. Additionally, its market share equals or exceeds its overall market share. This demonstrates excellent performance.

In the Canton-Massillon assessment area, the percentage of bank loans substantially exceeds the percentage of owner-occupied housing units. However, bank's market share is less than its overall market share. The bank had a very low volume of home mortgage refinance loans in this area. This demonstrates good performance.

In the Columbus, Dayton-Springfield, and Hamilton-Middletown assessment areas, the percentage of bank loans is less than the percentage of owner-occupied housing units and the bank's market share is less than its overall market share. This demonstrates adequate performance.

In the non-urban assessment areas, the percentage of bank loans is substantially less than the percentage of owner-occupied housing units. Additionally, the bank's market share is substantially less than its overall market share. This demonstrates poor performance.

The bank made no loans in the low-income areas of Youngstown-Warren, but only recently entered this market.

There are no low-income geographies in the areas of Fayette County or Huntington-Ashland assessment areas.

For lending in moderate-income geographies, the data reflect:

In the Fayette County, Akron, Canton-Massillon and Dayton-Springfield assessment areas, the percentage of bank loans exceeds the percentage of owner-occupied housing units. In most of these areas, it substantially exceeds the percentage of owner-occupied housing units. Additionally, the bank's market share exceeds its overall market share. This demonstrates excellent performance.

In the Cleveland-Lorain-Elyria assessment area, the percentage of the bank's loans exceeds the percentage of owner-occupied housing units, but its market share is slightly less than its overall market share. This too demonstrates excellent performance.

In the Columbus and the non-urban assessment areas, the percentage of bank loans is less than the percentage of the owner-occupied housing units. However, the market share in these areas exceeds the bank's overall market share. Also, in the Hamilton-Middletown assessment area, the percentage of bank loans exceeds the percentage of owner-occupied housing units, but its market share is less than its overall market share. This demonstrates good performance in each of these areas.

In the Huntington-Ashland assessment area, the percentage of bank loans is significantly less than the percentage of owner-occupied housing units and its market share is significantly less than its overall market share. Also, in the Youngstown-Warren area the bank made no loans in moderate-income geographies. Again, it is noted that the bank had a low volume of lending in this assessment area. Each of these situations demonstrates poor performance, but the bank only recently entered the Youngstown-Warren market.

Our analysis of the distribution of home mortgage refinance loans to borrowers of different income levels (See Table 9, Appendix B) reflects for lending to low-income families that:

In all assessment areas, the percentage of bank loans is significantly less than the percentage of owner-occupied housing units. In Canton-Massillon, Hamilton-Middletown, Huntington-Ashland and the non-

urban assessment areas, the bank's market share exceeds its overall market share. This demonstrates adequate performance.

In the remaining areas the bank's market share is less than its overall market share. This demonstrates poor performance.

In the Fayette County and Youngstown-Warren assessment areas, the bank made no loans to low-income families. This demonstrates poor performance, but the bank only recently entered the Youngstown-Warren market. Again, in each of these areas the bank had a very low volume of lending.

For lending to moderate-income families, the data reflect:

In the Cleveland-Lorain-Elyria, Akron, Canton-Massillon, Dayton-Springfield, Hamilton-Middletown and Huntington-Ashland assessment areas, the percentage of bank loans exceeds the percentage of owner-occupied housing units. Additionally, the bank's market share substantially approaches or exceeds its overall market share. This demonstrates excellent performance.

In the Columbus and the non-urban assessment areas, the percentage of bank loans is slightly less than the percentage of owner-occupied housing units and its market share is slightly less than its overall market share. This demonstrates good performance.

In the Youngstown-Warren assessment area, the percentage of bank loans is substantially less than the percentage of owner-occupied housing units. Additionally, its market share is less than its overall market share. This demonstrates adequate performance, but the bank only recently entered this market and had a low volume of home mortgage refinance loans in the area.

In the Fayette County assessment area, the percentage of bank loans is substantially below the percentage of owner-occupied housing units, and its market share is substantially below its overall market share. This demonstrates poor performance. Again, the bank had a very low volume of loans in this area.

### Multi-family Home Loans

While the geographic distribution is not reflected in a specific table, the bank made 36 multi-family home loans during the evaluation period. Six of these were made in low-income geographies and nine were made in moderate-income geographies.

### **Small Business and Community Development Lending**

In 1997, the bank originated 1,915 small loans to businesses for a total of \$213,838 million. Aggregate 1997 market data for all reporting institutions, ranks the bank anywhere from 1st in a market (Huntington-Ashland) to 25th (Youngstown-Warren). Significant competition for small loans to businesses is centered leading lenders, Mountainwest Financial Corporation, Bank One, Huntington National Bank, and American Express.

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The bank's geographic distribution of small loans to businesses in low-income geographies, as reflected in Table 5, Appendix B, shows:

In the Akron and Canton-Massillon assessment areas, the percentage of bank loans exceeds the percentage of businesses located in low-income geographies. Additionally, the bank's market share exceeds its overall market share. This demonstrates excellent performance. It is again noted that in the Canton-Massillon area the bank had a very low volume of small loans to businesses.

In the Cleveland-Lorain-Elyria assessment area, the bank's percentage of small loans to businesses is less than the percentage of businesses located in these areas, but its market share exceeds its overall market share. This demonstrates good performance.

In the Columbus, Dayton-Springfield, Hamilton-Middletown, and the non-urban assessment areas, the percentage of bank loans is less than the percentage of businesses in low-income geographies. Additionally, the bank's market share in these areas is less than its overall market share. This demonstrates adequate performance.

In the Youngstown-Warren assessment area, the bank made no small business loans in low-income geographies. This demonstrates poor performance, but the bank only recently entered this market and had a low volume of lending in the area.

There are no low-income geographies in the Fayette County and Huntington-Ashland assessment areas.

For lending in moderate-income geographies, the data reflects:

In the Cleveland-Lorain-Elyria and Akron assessment areas, the percentage of bank loans equals the percentage of small businesses in these areas. Additionally, the bank's market share equals or exceeds its overall market share. This demonstrates excellent performance.

In the Fayette County, Columbus, Dayton-Springfield, Huntington-Ashland and the non-urban assessment areas, the percentage of bank loans is less than the percentage of businesses, but the bank's market share is either slightly less than or slightly more than its overall market share. This demonstrates good performance.

In the Hamilton-Middletown assessment area, the percentage of bank loans is substantially less than the percentage of businesses located in moderate-income geographies. Additionally, the bank's market share is less than its overall market share. This demonstrates adequate performance.

In the Canton-Massillon and Youngstown-Warren assessment areas, the bank made no small loans to businesses in moderate-income geographies. This demonstrates poor performance, but the bank only recently entered the Youngstown-Warren market and had a very low volume of small loans to businesses in these areas.

The bank's distribution of small loans to businesses based on the size of the business is excellent. In all assessment areas, the percentage of bank loans either exceeds the percentage of businesses considered to be small and/or exceeds the percentage of small business loans the market as a whole made to small businesses. Additionally, the bank's market share of small loans to businesses exceeds its overall market share in all areas.

The bank made 36 multi-family home loans in these assessment areas. Additionally, the bank made 4 community development loans in the State. While not considered here, several of the loans reported as small loans to businesses were made for community development purposes.

## **INVESTMENT TEST**

Qualified investment and grant activity in the State is good. Performance in Ohio is consistent with the bank's overall investment performance. Information relating to the bank's qualified investment activity is found in Table 12, Appendix B.

### **Conclusions for Assessment Areas Receiving Full- and Limited-Scope Review**

Based on full-scope reviews, the bank's performance in the Cleveland-Lorain-Elyria MSA is good and in Fayette County it is considered to be poor; however, it did not change the overall Investment Test rating for the State of Ohio.

Based on limited-scope reviews, the bank's performance in the Akron, Canton-Massillon, Columbus, Dayton-Springfield MSAs and in the non-urban areas of the State of Ohio is consistent with the State rating. In the Hamilton-Middletown, Huntington-Ashland and Youngstown-Warren MSAs the bank's performance is weaker than the State rating.

The bank has invested a total of \$10.1 million in the State. Of that total, bank assessment areas received direct benefit of \$8 million. The remaining portion served communities that received benefit through statewide investment programs. During the evaluation period, the bank made direct investments of \$6.0 million in one community development financial institution, one low-income senior housing project, and three statewide equity funds. The three equity funds provided financial support to 15 low-income housing tax credit projects located throughout the Ohio assessment areas. Direct benefit of the total investment dollars made during the evaluation period, and to bank assessment areas, totals \$4.6 million. The remaining dollars are attributed to the Cincinnati Multistate MSA, and to other communities throughout the state of Ohio. Investments in the bank's assessment areas made prior to the evaluation period, but still outstanding, total \$5.2 million. Based on investments made in statewide equity funds, an additional \$195,000 is credited to other communities throughout the state of Ohio. Generally, none of the investments are innovative or complex and are routinely made by other private investors. In addition to direct investment dollars, the bank also provided grants and contributions of \$377,000 to organizations meeting the definition of community development.



## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-and Limited-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Cleveland-Lorain-Elyria MSA and Fayette County is good.

Based on limited-scope reviews, all other assessment areas' performance is consistent with the State rating.

#### **Retail Banking Services**

The bank's delivery systems are accessible to all portions of the bank's assessment areas in the state. A variety of services and products are offered throughout Ohio, including conveniently placed bank branches and full service ATMs, 24 hour Telephone Banking, Bank by Mail, PC Banking and Internet Banking. While not specifically developed for LMI geographies and individuals, many of these services do address their needs.

One hundred and seventy-five branches and 349 ATMs provide ready access to bank offered financial services. Most branches offer extended evening and weekend banking hours. The bank's distribution of branches and ATMs in low- and moderate-income geographies is commensurate with the distribution of the population within the State although some assessment areas have a distribution of branches and ATMs that is less than the distribution of the population. Still, some assessment areas have a distribution greater than the distribution of the population. In the Canton-Massillon and Youngstown-Warren and Fayette County assessment areas, the bank only has one branch in each area.

#### **Community Development Services**

The bank provides a good level of community development services throughout its assessment areas in the State. Technical assistance for small business owners, and home ownership counseling services, are examples of these. Star Bank employees serve on the Boards of, and provide their technical expertise to, a number of organizations directly involved in providing community development services including much needed educational opportunities.

## Full-Scope Assessment Areas

To gain a better understanding of the bank’s overall performance in Ohio, we conducted a full-scope review of the Cleveland-Lorain-Elyria MSA, the bank’s largest assessment area in the state, and the Fayette County (non-urban) assessment area, one of the bank’s smallest assessment areas.

### Analysis of the Cleveland-Lorain-Elyria MSA Assessment Area

The following table includes various demographic information for the assessment area:

Demographic Information for Full-Scope Area: Cleveland, OH MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	694	16	16	41	24	3
Population by Geography	2,102,248	10	14	48	28	0
Owner-Occupied Housing by Geography	535,191	5	11	52	32	0
Businesses by Geography	73,920	9	10	44	3	4
Farms by Geography	1,600	1	5	50	44	0
Family Distribution by Income Level	563,021	9	13	49	29	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	206923	19	22	45	14	0
Median Family Income	= \$36,500	Median Housing Value		= \$73,689		
HUD Adjusted Median Family Income for 1997	= \$46,900	Unemployment Rate (June 30, 1998)		= 4.3%		
Households Below the Poverty Level	= 11%					

Source: 1990 U.S. Census and 1997 HUD updated MFI.

### Lending Test

When comparing the total dollar of home and small business loans originated, Cleveland makes up 11% of total loans originated by Star Bank in all areas.

### Home Loans

During 1996 and 1997, the bank originated 3,298 home loans totaling more than \$154 million, as shown in Table 1, Appendix B. There are no unexplained lending gaps.

#### Home Purchase Loans

During 1996 and 1997, the bank originated 1,071 home purchase loans. The quantitative data relating to the geographic distribution of home purchase lending is found in Table 2, Appendix B.

The bank's geographic distribution of home purchase loans is excellent in low- and moderate-income geographies. In low-income geographies, the percentage of bank loans substantially exceeds the percentage of owner-occupied housing units in these areas (10% vs. 5%). Additionally, the bank's market share substantially exceeds its overall market share (3.7% vs. 1.3%). In moderate-income geographies, the bank's performance is excellent since the percentage of bank loans substantially exceeds the percentage of owner-occupied housing units in that geography (27% vs. 11%). In addition, the bank's market share in moderate-income geographies substantially exceeds its overall market share (3.1% vs. 1.3%).

Our analysis of the distribution of home purchase loans to borrowers of different income levels (See Table 7, Appendix B) shows excellent performance since the percentage of bank loans exceeds the percentage of low-income families (22% vs. 20%) and its market share substantially exceeds its overall market share (4.3% vs. 1.3%). In lending to moderate-income families, the bank's performance is also excellent since the percentage of the bank's loans exceeds the percentage of moderate-income families (18% vs. 17%). Additionally, the bank's market share significantly exceeds its overall market share (2.6% vs. 1.3%).

#### Home Improvement Loans

During 1996 and 1997, the bank originated 920 home improvement loans. The quantitative data relating to the geographic distribution of home improvement lending is found in Table 3, Appendix B.

The bank's geographic distribution of home improvement loans is good. In both low- and moderate-income geographies, the percentage of bank loans significantly exceeds the percentage of owner-occupied housing units, but its market share is less than its overall market share.

Our analysis of the distribution of home improvement loans to borrowers of different income levels (See Table 8, Appendix B) shows the percentage of bank loans to low-income families is good since the percentage of the bank's loans is less than the percentage of low-income families (15% vs. 20%) while its market share slightly exceeds the overall market share (4.3% vs. 4.2%). In lending to moderate-income families, the percentage of bank loans exceeds the percentage of moderate-income families (23% vs. 17%), but its market share is less than its overall market share (3.6% vs. 4.2%).

#### Home Mortgage Refinance Loans

During 1996 and 1997, the bank originated 1,298 home mortgage refinance loans. The quantitative data relating to the geographic distribution of home mortgage refinance lending is found in Table 4, Appendix B.

The bank's geographic distribution of home mortgage refinance loans is excellent. In low-income geographies, the percentage of bank loans exceeds the percentage of owner-occupied housing units (7% vs. 5%) and its market share exceeds the overall market share (2.2% vs. 1.8%). In moderate-income geographies, the percentage of bank loans exceeds the percentage of owner-occupied housing units (14% vs. 11%), but its market share is slightly less than its overall market share (1.6% vs. 1.8%).

Our analysis of the distribution of home mortgage refinance loans to borrowers of different income levels (See Table 9, Appendix B) shows the percentage of bank loans to low-income families is adequate as the percentage of bank loans (8%) is substantially less than the percentage of low-income families (20%). To further support this finding, the bank's market share of home mortgage refinance loans is only 1.3% compared to its overall market share of 1.8%. The bank's home mortgage refinance lending to moderate-income families exceeds the percentage of moderate-income families (21% vs. 17%), which is excellent performance. In addition, the bank's market share exceeds its overall market share (2% vs. 1.8%).

### Multi-family Home Loans

While the geographic distribution is not reflected in a specific table, the bank made 9 multi-family home loans during the evaluation period. Three of these were made in low-income geographies and four in moderate-income geographies.

### **Small Business and Community Development Lending**

In 1997, the bank originated 538 small loans to businesses for a total of \$61.9 million. Aggregate 1997 market data for all reporting institutions, ranks the bank the 10th largest small business lender in the assessment area. Significant competition for small business lending is centered in the leading lenders, Mountainwest Financial Corporation, American Express, Huntington National Bank, and Bank One.

As shown in Table 5, Appendix B, the bank's geographic distribution of small loans to businesses is excellent. The bank's small loans to businesses in low-income geographies (8%) is good when compared to 9% of businesses in low-income geographies. Additionally, the bank's market share slightly exceeds its overall market share (3% vs. 2.9%), which demonstrates excellent performance. In moderate-income geographies, the percentage of bank loans equals the percentage of businesses located in these geographies (10%), and the bank's market share equals its overall market share (2.9%). This demonstrates excellent performance.

Table 10, Appendix B, shows that the distribution of small loans to businesses of different revenue levels is excellent. Approximately 73% of the number of small loans to businesses made by the bank are to small businesses. This exceeds the assessment area's percentage of small businesses (71%). Also, the bank's distribution exceeds the aggregate market data, which shows 48% of all small loans to businesses being made to small businesses.

In addition to multi-family loans, the bank made 2 community development loans within the Cleveland-Lorain-Elyria MSA.

### **Investment Test**

The bank's investment activity in the Cleveland-Lorain-Elyria MSA totaling nearly \$2.4 million shows good responsiveness to community development needs. Performance in the Cleveland-Lorain-Elyria MSA is consistent with the state's investment performance. Most investment dollars are concentrated in low-income housing tax credits and in one community development financial institution. The majority of the investments,

however, were made prior to this CRA evaluation period, but remain outstanding. Tax credit investments include the following:

McDonald Ohio Tax Credit Fund

This statewide fund invested in a new construction, affordable housing complex, with 48 units located in the Cleveland assessment area. The National Affordable Housing Foundation, a nonprofit corporation that develops affordable housing and provides supportive services for low-income families, was active in forming this housing project (*Loraine Green I Apts*).

National Equity Fund (prior evaluation period investment)

The fund has directed the majority of the bank's investment to the Cleveland market. Currently, the fund has targeted nine affordable housing projects that will provide 359 affordable housing units to persons living in the Cleveland assessment area.

Enterprise Housing Partners (prior evaluation period investment)

This nationwide fund invested in two housing projects located within the bank's Cleveland assessment area. The two investments helped fund the construction or rehabilitation of 240 affordable housing units (*Cleveland XI & Famicos*).

Ohio Equity Fund for Housing IV (prior evaluation period investment)

This statewide fund provided investment dollars to develop the first phase of a 105-unit senior housing complex. All of the units in the first phase are affordable to persons at or below 60% of the median family income (*Wesley Village*).

Other investment dollars include grants and contributions, a deposit in a community development financial institution, and one direct, prior period investment in a low-income housing tax credit (*Shore Bank & Trust Company and Boardwalk Apts*).

## **Service Test**

### **Retail Banking Services**

The bank offers a variety of services throughout the MSA, including conveniently placed full service ATMs, 24 hour Telephone Banking, Bank by Mail, PC Banking, and Internet Banking. While not specifically designed for LMI individuals, many of these services address the needs of LMI individuals.

Fifty-two branches and 98 ATMs provide ready access to bank offered financial services. Most of the branches offer extended evening and weekend banking hours. The bank's distribution of branches in low-income geographies is 8% compared to 10% of the population residing in low-income geographies. In moderate-

income geographies, the bank's distribution of branches is 8% compared to 14% of the population residing in those areas. The availability of branches is augmented through the good accessibility of ATMs, of which 7% are located in low-income geographies compared to 10% of the population residing in those areas. In moderate-income geographies, 9% of the bank's ATMs are located in moderate-income geographies compared to 14% of the population residing in those areas.

The bank's record of opening and closing branches in the MSA has resulted in increased services to LMI geographies/individuals. Since the last CRA evaluation period, one branch was opened in a low-income tract, and one branch was closed in a moderate-income tract. The closed branch was consolidated into another Star Bank branch located a few blocks away.

**Community Development Services**

The bank offers several community development services in the Cleveland MSA. The services offered include financial services training and borrower education programs.

**Analysis of the Fayette County Assessment Area**

The following table includes various demographic information for the Fayette County assessment area:

Demographic Information for Full-Scope Area: Fayette County, OH						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	7	NA	29	71	NA	NA
Population by Geography	27,466	NA	28	72	NA	NA
Owner-Occupied Housing by Geography	6,634	NA	28	72	NA	NA
Businesses by Geography	841	NA	24	76	NA	NA
Farms by Geography	36	NA	14	86	NA	NA
Family Distribution by Income Level	7,804	NA	27	73	NA	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,555	NA	32	68	NA	NA
Median Family Income = \$30,563		Median Housing Value = \$44,559				
HUD Adjusted Median Family Income for 1997 = \$38,800		Unemployment Rate = NA				
Households Below the Poverty Level = 16%						

Source: 1990 U.S. Census and 1997 HUD updated MFI.

**Lending Test**

The total amount of home and small business loans originated in rural Fayette County represents less than one percent of total loans originated by Star Bank in all assessment areas. The bank entered into this market four

years ago, and the assessment area is one of its smallest. There are no low- or upper-income geographies in the assessment area.

## Home Loans

The bank originated 29 home loans totaling more than \$1 million in Fayette County. There are no unexplained lending gaps.

### Home Purchase Loans

During 1996 and 1997, the bank originated 5 home purchase loans. The quantitative data relating to the geographic distribution of home purchase loans is found in Table 2, Appendix B.

The bank's geographic distribution of home purchase loans is good in moderate-income geographies since the bank's percentage of loans made exceeds the percentage of owner-occupied housing units (40% vs. 28%). However, the bank's market share is slightly less than its overall market share (2% vs. 2.3%).

Our analysis of the distribution of home purchase loans to borrowers of different income levels (See Table 7, Appendix B) shows the percentage of bank loans to low- and moderate-income families is poor since the bank made no loans to low- or moderate-income borrowers.

### Home Improvement Loans

During 1996 and 1997, the bank originated 11 home improvement loans. The quantitative data relating to the geographic distribution of home improvement loans can be found in Table 3, Appendix B.

The bank's geographic distribution of home improvement loans is good in moderate-income geographies since the percentage of bank loans is slightly less than the percentage of owner-occupied housing units in these areas (27% vs. 28%). The bank's market share is also less than its overall market share (4.4% vs. 6.3%).

Our analysis of the distribution of home improvement loans to borrowers of different income levels (See Table 8 in the Appendix) shows the percentage of bank loans to both low- and moderate-income families is good when compared to the percentage of low- and moderate-income families living in the assessment area. However, performance is enhanced in both cases because the bank's market share exceeds its overall market share.

### Home Mortgage Refinance Loans

During 1996 and 1997, the bank originated 13 home mortgage refinance loans. The quantitative data relating to our analysis is found in Table 4, Appendix B.

The bank's geographic distribution of home mortgage refinance loans in moderate-income geographies is excellent since the percentage of the loans the bank made (39%) in these geographies significantly exceeds the percentage of owner-occupied housing units (28%), and its market share in these areas significantly exceeds its overall market share (13.2% vs. 6.1%).



Our analysis of the distribution of home mortgage refinance loans to borrowers of different income levels (See Table 9, Appendix B) shows the bank's performance is poor. This is due to the fact that the bank made no home mortgage refinance loans to low-income families. In addition, the percentage of bank loans to moderate-income families is substantially less than the percentage of moderate-income families (8% vs. 21%). Additionally, the bank's market share to moderate-income borrowers is substantially less than its overall market share (0% vs. 6.1%).

### Multi-family Home Loans

The bank made no multi-family home loans in Fayette County.

### **Small Business and Community Development Lending**

In 1997, the bank originated 5 small loans to businesses for a total of \$137,000. Aggregate 1997 market data for all reporting institutions, ranks the bank the 6th largest small business lender in the assessment area. Significant competition for small business lending is centered in the leading lender, Huntington National Bank, which dominated the market for small loans to businesses.

As shown in Table 5, Appendix B, the bank's geographic distribution of small loans to businesses is good. Again, there are no low-income geographies in Fayette County. The percentage of bank small loans to businesses in moderate-income geographies is 20%, which is less than the percentage of businesses (24%) located in moderate-income areas. This is further supported by the bank's market share of small loans to businesses being slightly less than its overall market share for small loans to businesses (2.4% vs. 2.6%).

Table 10, Appendix B, shows the distribution of small loans to businesses of different revenue levels is excellent. 100% of the number of small loans to businesses made by the bank are to small businesses. This significantly exceeds the assessment area's percentage of all businesses (71%) considered to be small. Also, the bank's distribution exceeds the aggregate market data, which shows 73% of all small loans to businesses made to small businesses. Additionally, the bank's market share of loans to small businesses exceeds its market share of all small loans to businesses (3.4% vs. 2.6%).

### **Investment Test**

The bank has not made any investments, nor has it provided grants or contributions to community development organizations serving Fayette County. Based on information available, however, qualified investment opportunities in this assessment area are limited. In addition, the bank is a relatively new entrant in this market.

### **Service Test**

The bank adequately serves the community. One branch is centrally located in the county. Although located in a middle-income tract, the branch is able to help serve the needs of the entire county. There are only seven geographies in the county ( two moderate-income and five middle-income tracts.) A full service ATM is also centrally located in a middle-income tract. The bank's alternative delivery systems supplement access to financial

services. The bank has neither opened nor closed a branch in Fayette County during the CRA evaluation period. However, they did acquire the one branch during this evaluation period.

## INDIANA STATE RATING

**CRA Rating for Indiana:**            **Satisfactory**

**The lending test is rated:**            **Low Satisfactory**

**The investment test is rated:**        **Low Satisfactory**

**The service test is rated:**            **Low Satisfactory**

The major factors that support this rating include:

- ! The geographic distribution of home loans is good, and the distribution by borrower income level is adequate.
- ! The bank offers two flexible home loan products for low- and moderate-income borrowers.
- ! The geographic distribution of small loans to businesses in low- and moderate-income areas is poor. The distribution of loans to small businesses is good.
- ! There are no unexplained gaps in home and small business lending.
- ! The bank has a small level of qualified investments within its one assessment area in Indiana, but opportunities for qualified investments are limited.
- ! The bank's services are readily accessible to all geographies in the bank's assessment area.

### **Description of Institution's Operation in Indiana**

Excluding the Cincinnati, Ohio multistate MSA, and the Louisville, Kentucky multistate MSA the bank has one assessment area in Indiana, a rural (non-urban) area in eastern Indiana, which includes the counties of Fayette, Randolph, and Wayne. The state rating for Indiana is predicated on the bank's performance in this area, which we reviewed in-depth (full scope analysis).

The following table highlights some important demographic data for the Indiana assessment area:

Demographic Information for Full-Scope Area: Eastern Indiana						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	34	3	18	73	6	NA
Population by Geography	125,114	1	19	73	7	NA
Owner-Occupied Housing by Geography	33,500	1	14	77	8	NA
Businesses by Geography	3,623	1	26	64	9	NA
Farms by Geography	126	0	8	82	10	NA
Family Distribution by Income Level	35063	1	17	74	8	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,472	1	24	69	6	NA
Median Family Income = \$30,800		Median Housing Value = \$40,725				
HUD Adjusted Median Family Income for 1997 = \$39,000		Unemployment Rate = NA				
Households Below the Poverty Level = 13%						

Source: 1990 U.S. Census and 1997 HUD updated MFI.

Star Bank operates 14 branches and 15 ATMs in the state. Major bank competitors include First Bank Richmond, N.A., Bank One, N.A., Peoples Loan & Trust Bank, and Wayne Bank & Trust Company.

While we conducted no community contacts in this assessment area during the examination, information was gathered from prior contacts, available governmental information, and other bank performance evaluations. The predominant credit and related needs in the assessment areas are for affordable housing, and funding for small businesses and small farms. In addition, based on information available, it is important to note that qualified investment opportunities in this assessment are limited.

## LENDING TEST

### Lending Activity

The bank offers a variety of lending products that are responsive to local credit needs. Excluding the Cincinnati, Ohio multistate MSA, the total dollar amount of home and small business loans originated in the State represents 1% of similar loans originated by Star Bank in all areas.

### Home Loans

During 1996 and 1997, the bank originated 768 home loans totaling more than \$22 million. There are no unexplained gaps in the home lending distribution.

### Home Purchase Loans

During 1996 and 1997, the bank originated 124 home purchase loans. The quantitative data relating to the geographic distribution of home purchase loans is found in Table 2, Appendix B.

The bank's geographic distribution of home purchase loans in low-income geographies is poor since the bank made no such loans in low-income geographies. In moderate-income geographies, the percentage of bank loans exceeds the percentage of owner-occupied housing units (15% vs. 14%) and its market share exceeds its overall market share (8.2% vs. 7.6%) which demonstrates excellent performance. In combination, the bank's geographic distribution of home purchase loans is adequate.

Our analysis of the distribution of home purchase loans to borrowers of different income levels (See Table 7, Appendix B) shows that the percentage of the bank's loans to low-income families (7%) is poor when compared to the percentage of low-income families (20%). Additionally, the bank's market share is less than its overall market share (4.9% vs. 7.6%). In lending to moderate-income families, the percentage of bank loans is less than the percentage of moderate-income families (19% vs. 21%) and its market share is less than its overall market share (7% vs. 7.6%), which is good. In combination, the bank's borrower distribution of home purchase loans is adequate.

#### Home Improvement Loans

During 1996 and 1997, the bank originated 289 home improvement loans. The quantitative data relating to the geographic distribution of home improvement loans is found in Table 3, Appendix B.

The bank's geographic distribution of home improvement loans is good. In low-income geographies, the percentage of bank loans equals the percentage of owner-occupied housing units (1%) and its market share substantially exceeds its overall market share (100% vs. 38.2%). In moderate-income geographies, the percentage of bank loans exceeds the percentage of owner-occupied housing units (21% vs. 14%) and its market share substantially approaches its overall market share (36% vs. 38.2%).

Our analysis of the distribution of home improvement loans to borrowers of different income levels (See Table 8, Appendix B) shows the percentage of the bank's loans to low-income families is adequate. In lending to low-income families, the percentage of bank loans is significantly less than the percentage of low-income families (14% vs. 20%), but its market share substantially exceeds its overall market share (52.1% vs. 38.2%). In lending to moderate-income families, the percentage of bank loans is slightly less than the percentage of moderate-income families (19% vs. 21%) and its market share is essentially approaching the overall market share (34.1% vs. 38.2%).

#### Home Mortgage Refinance Loans

During 1996 and 1997, the bank originated 353 home mortgage refinance loans. The quantitative data relating to the geographic distribution of home mortgage refinance loans is found in Table 4, Appendix B.

The bank's geographic distribution of home mortgage refinance loans is excellent. In both low- and moderate-income geographies, the percentage of bank loans equals or exceeds the percentage of owner-occupied housing

units in their respective geographies. Additionally, in both cases the bank's market share exceeds its overall market share.

Our analysis of the distribution of home mortgage refinance loans to borrowers of different income levels (See Table 9, Appendix B) shows that the percentage of bank loans to low-income families is poor. In lending to low-income families, the percentage of bank loans is substantially less than the percentage of low-income families (8% vs. 20%), and its market share is less than its overall market share (20.5% vs. 23%). In lending to moderate-income families, the percentage of bank loans is slightly less than the percentage of moderate-income families (20% vs. 21%) and its market share is less than its overall market share (21.3% vs. 23%).

### Multi-family Home Loans

While the geographic distribution is not reflected in a specific table, the bank made 2 multi-family home loans during the evaluation period. Both of these were made in moderate-income geographies.

### **Small Business and Community Development Lending**

In 1997, the bank originated 89 small loans to businesses for a total of \$6.8 million. Aggregate 1997 market data for all reporting institutions, ranks the bank the 4th largest small business lender in the assessment area. Significant competition for small business lending is centered in the leading lenders, Mountainwest Financial Corporation and First Bank Richmond.

As shown in Table 5, Appendix B, the bank's geographic distribution of small loans to businesses is poor, although the number of qualifying small business borrowers in this area may be relatively low. The bank's small loans to businesses in low-income geographies is poor since the bank made no loans in low-income geographies. In moderate-income geographies, the percentage of bank loans is substantially less than the percentage of businesses located in these areas (12% vs. 26%). Additionally, in moderate-income geographies, the bank's market share is significantly less than its overall market share (4% vs. 8.7%).

Table 10, Appendix B, shows the distribution of small loans to businesses of different revenue levels is excellent. Approximately 94% of the number of small loans to businesses made by the bank are to small businesses. This significantly exceeds the assessment area's percentage of all businesses (73%) considered to be small. Also, the bank's distribution exceeds the aggregate market data, which shows 76% of all small loans to businesses made to small businesses.

The bank made no community development loans within this assessment area.

### **INVESTMENT TEST**

Investment and grant activity in the State is adequate in view of the limited investment opportunities available. The overall performance for the state is weaker than the bank's overall investment performance. The bank's qualified investments in its Eastern Indiana assessment area total \$40,000 and consist of 20 grants and contributions to 11 organizations.



## **SERVICE TEST**

### **Retail Banking Services**

Full banking services are provided in all of the bank's fourteen branches in the assessment area. Many of the branches provide extended evening and weekend hours. One community development service, a home buyers seminar, was offered during the evaluation period.

The bank's geographic distribution of branches shows the bank has no offices in low-income geographies, but only 1% of the population resides there. Also, 22% of the bank's branches are located in moderate-income geographies, where 19% of the population resides. The bank's distribution of its ATMs shows of the 15 ATMs, 7% are located in low-income geographies and 7% are located in moderate-income geographies. There were no branches opened or closed in LMI geographies since the last CRA evaluation period.

### **Community Development Services:**

One community development service, a home buyers seminar, was offered during the evaluation period.



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## KENTUCKY STATE RATING

**CRA Rating for Kentucky:**      **Satisfactory**

**The lending test is rated:**      **Low Satisfactory**

**The investment test is rated:**      **Low Satisfactory**

**The service test is rated:**      **Low Satisfactory**

The major factors that support this rating include:

- ! The bank is responsive to community credit needs.
- ! Overall, the geographic distribution of home loans among the state's assessment areas is adequate.
- ! The distribution of home loans by borrower income level among the assessment areas is generally adequate.
- ! The bank offers two flexible home loan products for low- and moderate-income borrowers, both under the bank's HAP program.
- ! Overall, the geographic distribution of small loans to businesses among the state's assessment areas is adequate. Overall, the distribution of small loans to small businesses among the state's assessment areas is excellent.
- ! Lending performance is adequate in the Lexington and Owensboro MSAs, and the Central Kentucky assessment area which are the state's largest assessment areas by deposit levels. The performance in these areas is consistent with the state's overall lending performance.
- ! Home lending performance in the Evansville-Henderson MSA is consistent with, while small business lending is weaker than, the state's overall lending performance.
- ! Overall lending performance in the non-urban areas of Kentucky is less than the state's overall lending performance.
- ! The bank did not make any community development loans in the State. However, due to their size and CRA reporting requirements, the bank reported some community development-related loans as small loans to businesses and we considered them in our analysis of small business lending.
- ! There are no unexplained gaps in home or small business lending.
- ! The bank has made an adequate level of qualified investments within the State. These investments are concentrated in the Lexington MSA. The volume in other assessments areas is relatively low.

! The bank's services are accessible to all geographies in the state's assessment areas.

### **Description of Institution's Operation in Kentucky**

Excluding the Cincinnati, Ohio and Louisville, Kentucky multistate MSAs, the bank's assessment areas in the state include all or portions of three Metropolitan Statistical Areas (MSAs), those being Evansville-Henderson, Lexington, and Owensboro. In addition to these MSAs, the bank has designated all or portions of ten non-urban counties within its assessment areas. The counties included in the non-urban areas are Barron, Boyle, Carroll, Estill, Hancock, Hardin, Marion, McLean, Shelby, and Washington. For the most part, these operations were acquired as a result of Star Bank's very recent acquisition of Great Financial Corporation, Louisville, Kentucky.

Accordingly, the CRA activities of the former Great Financial Corporation are included in Star Bank's overall Kentucky state rating, but new assessment areas located in Kentucky and Louisville, KY multistate MSA have been under the management of Star bank for less than sixty (60) days of the period encompassed by this examination.

The bank operates 23 branches and 39 ATMs in the State. While it varies by assessment area, major bank competitors include Bank One, National City, and PNC Bank. However, there are certain assessment areas where local community banks provide very strong competition.

Various community contacts were made during this examination and additional information was gathered from contacts done by other regulators. The predominant credit and service needs in the assessment areas are for affordable housing, loans for small businesses, technical assistance to small business, and home buyer education.

### **Scope of Review**

The bank's performance in the state was based on an evaluation of lending, investment and service activities in all state assessment areas, excluding that part of the state in the Cincinnati and Louisville multistate MSAs. Of the five assessment areas within the state, we selected the Owensboro MSA and the Central Kentucky assessment area (a non-MSA) for full-scope review. In making this determination, we relied on several factors including income levels of the assessment area geographies and the bank's market presence as defined by its lending activities and deposit levels. A detailed discussion of these assessment areas is included in this section. All other assessment areas within the state received a limited-scope review. Limited scope reviews were performed for the three remaining assessment areas: the Evansville-Henderson MSA, the Lexington MSA, and the remaining non-urban counties.

## **LENDING TEST**

### **Lending Activity**

The bank offers a variety of lending products that are responsive to local credit needs. The total dollar amount of home and small business loans originated in the State represent 23% of similar loans originated by the bank in

all areas. A substantial majority of the loans were originated by the recently acquired Great Financial Bank, Louisville, KY.

### **Conclusions for Assessment Areas Receiving Full- and Limited-Scope Reviews**

The bank's performance under the Lending Test in Kentucky is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Owensboro MSA and in the Central Kentucky area is adequate.

Based on Limited-Scope reviews, the bank's lending performance in the Lexington MSA is consistent with the State rating. In the Evansville-Henderson MSA the bank's home lending performance is consistent with the State rating, while small business lending performance is weaker than the State rating. In the non-urban areas of the State the bank's performance is weaker than the State rating.

### **Home Loans**

During 1996 and 1997, the bank originated 4,326 home loans totaling more than \$278 million. Assessment areas in Kentucky with the largest volume of home loans are the Lexington MSA (6%), the Owensboro MSA (5%), and Central Kentucky (3%). The remaining assessment areas have less than 1% of home loans. There are no unexplained lending gaps. In 1997, the bank originated home loans in 56% of low-income and 83% of moderate-income areas, respectively.

#### Home Purchase Loans

The bank's geographic distribution of home purchase loans in the State is good. This conclusion is based on the quantitative data found in Table 2, Appendix B. For low-income geographies, the data reflect:

In the Owensboro, Evansville-Henderson and Lexington assessment areas, the percentage of bank loans made in these areas is less than the percentage of owner-occupied housing units. However, in each of these areas, the bank's market share exceeds its overall market share. This demonstrates good performance.

In the Central Kentucky and the non-urban assessment areas, there are no low-income geographies.

For lending in moderate-income geographies, the data reflects:

In the Owensboro, Central Kentucky, Evansville-Henderson and Lexington assessment areas, the percentage of bank loans is less than the percentage of owner-occupied housing units. However, in all areas, except Evansville-Henderson, the bank's market share exceeds its overall market share. This demonstrates good performance. In the Evansville-Henderson assessment area, the bank's market share is substantially less than its overall market share. This demonstrates adequate performance.

In the non-urban assessment areas, the bank made no loans in moderate-income geographies. This demonstrates poor performance.

Our analysis of the distribution of home purchase loans to borrowers of different income levels (See Table 7, Appendix B) shows for lending to low-income families in the Owensboro, Central Kentucky, Evansville-Henderson and Lexington assessment areas, the bank's percentage of loans to low-income families is substantially less than the percentage of low-income families. However, the bank's market share in Owensboro, Evansville-Henderson and Lexington exceeds its overall market share. In the Central Kentucky and non-urban assessment areas, the bank's market share is less than its overall market share.

In lending to moderate-income families, the data reflects that in the Owensboro, Evansville-Henderson and Lexington assessment areas, the percentage of bank loans to moderate-income families exceeds the percentage of moderate-income families. Additionally, in the Owensboro assessment area, the bank's market share exceeds its overall market share. This demonstrates excellent performance in Owensboro. In the Evansville-Henderson and Lexington assessment areas, the bank's market share is less than its overall market share demonstrating good performance.

In the Central Kentucky and the non-urban assessment areas, the percentage of bank loans is less than the percentage of moderate-income families. In both of these areas, the bank's market share is less than its overall market share. This demonstrates adequate performance.

#### Home Improvement Loans

Quantitative data relating to our analysis is found in Table 3, Appendix B. The bank's geographic distribution of home improvement loans in low-income geographies indicates:

In the Owensboro and Lexington assessment areas, the percentage of bank loans is less than the percentage of owner-occupied housing units. In the Owensboro assessment area, the bank's market share exceeds its overall market share. This demonstrates good performance. In the Lexington assessment area, the bank's market share is less than its overall market share. This demonstrates adequate performance.

In the Evansville-Henderson assessment area, the bank made no loans in low-income geographies. This demonstrates poor performance, but the bank had a low volume of loans in this area.

There are no low-income geographies in the Central Kentucky or non-urban assessment areas.

For lending in moderate-income geographies, the data reflects:

In the Lexington and the non-urban assessment areas, the percentage of bank loans exceeds the percentage of owner-occupied housing units. In addition, the bank's market share exceeds its overall market share in these areas. This demonstrates excellent performance.

In the Owensboro and Central Kentucky assessment areas, the percentage of bank loans is substantially less than the percentage of owner-occupied housing units. In each of these areas, the bank's market share is significantly less than its overall market share. This demonstrates poor performance.

The bank made no loans in moderate-income geographies in the Evansville assessment area. This demonstrates poor performance, although the bank made only a total of 15 loans in this area.

Our analysis of the distribution of home improvement loans to borrowers of different income levels (See Table 8, Appendix B) shows for lending to low-income families:

In all assessment areas, the bank's percentage of loans is substantially less than the percentage of low-income families. In the Owensboro, Evansville-Henderson and the non-urban assessment areas, the bank's market share exceeds its overall market share. This demonstrates good performance. In the Central Kentucky and Lexington assessment areas, the bank's market share is less than its overall market share. This demonstrates adequate performance.

For lending to moderate-income families, the data reflects:

In the Evansville-Henderson and Lexington assessment areas, the percentage of bank loans exceeds the percentage of moderate-income families. In both areas, the bank's market share exceeds its overall market share. This demonstrates excellent performance.

In the Owensboro, Central Kentucky and the non-urban assessment areas, the percentage of bank loans is less than the percentage of moderate-income families. In Central Kentucky and the non-urban areas, the bank's market share exceeds its overall market share. This demonstrates good performance. In Owensboro, the bank's market share is less than its overall market share. This demonstrates adequate performance.

### Home Mortgage Refinance Loans

The bank's geographic distribution of home mortgage refinance loans is adequate. This conclusion is based on the quantitative data found in Table 4, Appendix B. For low-income geographies, the data reflects:

In the Owensboro and Lexington assessment areas, the percentage of bank loans is less than the percentage of owner-occupied housing units. In Lexington, the bank's market share exceeds its overall market share. This demonstrates good performance. In Owensboro, the bank's market share is substantially less than its overall market share. This demonstrates adequate performance.

In the Evansville-Henderson assessment area, the bank made no loans in low-income geographies. This demonstrates poor performance.

There are no low-income geographies in the Central Kentucky or non-urban assessment areas.

For lending in moderate-income geographies:

In the Owensboro, Central Kentucky, Evansville-Henderson and Lexington assessment areas, the percentage of bank loans is less than the percentage of owner-occupied housing units. Additionally, in each of these areas, the bank's market share is less than its overall market share. This demonstrates adequate performance.

The bank made no loans in moderate-income geographies in the non-urban assessment area. This demonstrates poor performance.

Our analysis of the distribution of home mortgage refinance loans to borrowers of different income levels (See Table 9, Appendix B) shows for lending to low-income families:

In all assessment areas, the percentage of bank loans is substantially less than the percentage of owner-occupied housing units. Only in the Central Kentucky assessment area does the bank's market share exceed its overall market share. This demonstrates good performance. However, in the other areas the bank's market share is less than its overall market share.

The bank made no loans to low-income families in the non-urban assessment areas.

For lending to moderate-income families:

In all assessment areas, the percentage of bank loans is less than the percentage of moderate-income families. In the Central Kentucky and non-urban areas, the bank's market share exceeds its overall market share which demonstrates good performance. In the remaining assessment areas, the bank's market share is less than its overall market share. This demonstrates adequate performance.

### Multi-family Home Loans

The bank made no multi-family home loans during the evaluation period.

### **Small Business and Community Development Lending**

In 1997, the bank originated 244 small loans to businesses for a total of \$23.8 million. Aggregate 1997 market data for all reporting institutions, ranks the bank anywhere from 6th in a market (Owensboro) to 21st (Evansville-Henderson). In Owensboro, the leading lenders are National City Bank of Kentucky, Mountainwest Financial Corporation, Bank One Kentucky, N.A. and Owensboro National Bank. In Central Kentucky, the leading lenders are New Farmers National Bank, Trans Financial Bank, N.A., and Bank One Kentucky. In Evansville-Henderson, the leading lenders are Citizens National Bank, Old National Bank, and Mountainwest Financial Corporation. In Lexington, the leading lenders are National City Bank of Kentucky, Bank One Kentucky, N.A., and Mountainwest Financial Corporation. In the non-urban areas, the leading lenders are PNC Bank, N.A. and Bank One Kentucky, N.A.

The quantitative information relating to the geographic distribution of small loans to businesses is found in Table 5, Appendix B. The geographic distribution of the bank's small loans to businesses in low-income geographies is adequate. The data reflects:

In the Owensboro and Lexington assessment areas, the percentage of bank small loans to businesses is less than the percentage of businesses. In the case of Lexington, it is substantially less than the percentage of businesses. In Owensboro, the bank's market share exceeds its overall market share. This demonstrates good performance. However, in Lexington, the bank's market share is substantially less than its overall market share. This demonstrates poor performance.

The bank made no small loans to businesses in low-income geographies in the Evansville-Henderson area. This demonstrates poor performance.

There are no low-income geographies in the Central Kentucky or non-urban assessment areas.

For lending in moderate-income geographies:

In the Central Kentucky assessment area, the percentage of bank small loans to businesses substantially exceeds the percentage of businesses in this area. In addition, its market share substantially exceeds its overall market share. This demonstrates excellent performance.

In Owensboro and Lexington, the percentage of bank small loans to businesses is substantially less than the percentage of businesses in these areas. In addition, the bank's market share is less than the overall market share. This demonstrates adequate performance.

The bank made no small loans to businesses in moderate-income geographies in the Evansville-Henderson and the non-urban assessment areas.

The quantitative data relating to our analysis of the distribution of small business loans to small businesses is found in Table 10, Appendix B. The bank's distribution of small loans to small businesses is excellent, except in Evansville-Henderson, where it is adequate. In all other assessment areas, the percentage of bank loans exceeds the percentage of businesses that are considered to be small. In addition, the percentage of bank loans to small businesses exceeds the percentage of similar loans made by all other lenders in these areas. The exception to the above is in Evansville-Henderson, where only 33% of the bank's small business loans were made to small businesses. Seventy-four percent of all businesses in this area are considered to be small. In addition, the market, in aggregate, made 69% of its loans in this area to small businesses. This demonstrates poor performance.

## **INVESTMENT TEST**

Investment and grant activity and their responsiveness to credit and community development needs in the State are adequate. Performance in Kentucky is weaker than the bank's overall investment performance.

## **Conclusions for Assessment Areas Receiving Full- and Limited-Scope Review**

The bank's performance under the Investment Test in the State of Kentucky is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Owensboro MSA and the Central Kentucky area is adequate.

Based on limited-scope reviews, the bank's performance in the Lexington MSA is excellent. In the Evansville-Henderson MSA and the non-urban areas the bank's performance is consistent with the State rating.

The bank has invested a total of \$1.4 million in the State. Investments were made during the CRA evaluation period and consist of two low-income housing tax credit projects that developed 24 housing units in Shelbyville, and 32 units in the Lexington MSA. Neither investment was considered innovative nor complex. Grants and contributions were provided to two housing related organizations located in the Owensboro and Lexington MSA assessment areas.

Investment performance in the Lexington MSA and non-urban assessment areas was consistent with the bank's state performance. Investment dollars in the Owensboro MSA assessment areas consist of one \$1,300 contribution provided to a housing related organization. Also, Central Kentucky and the Evansville-Henderson MSA reported no qualifying investments. The assessment areas with minimal investments did not significantly diminish the state's investment rating, because of strong performance in the Lexington MSA and the non-urban assessment areas.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full- and Limited-Scope Reviews**

The bank's performance under the Service Test in the State of Kentucky is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Owensboro MSA and the Central Kentucky area is adequate.

Based on limited-scope reviews, the bank's performance in all other assessment areas is consistent with the State rating.

The bank's delivery systems are accessible to all portions of the bank's assessment areas in the State. A variety of services and products are offered in Kentucky, including conveniently placed bank branches and full service ATMs, 24 hour Telephone Banking, Bank by Mail, PC Banking and Internet Banking. While not specifically developed for LMI individuals, many of these services address their needs. The bank provides an adequate level of community development services throughout its assessment areas in the state.

Overall, the percentage of branch offices located in LMI areas is commensurate with the percentage of households that reside in LMI areas among the bank's assessment areas. Also, the availability of bank branches is augmented through the accessibility of ATMs and the other alternative delivery systems highlighted above.



See Table 13, Appendix B, for the distribution of the bank's branches and ATMs by assessment area and geography income level.

### Full-Scope Assessment Areas

To gain a better understanding of the bank's overall performance in Kentucky, we conducted a full scope review of the Owensboro MSA, and the Central Kentucky assessment areas.

### Analysis of the Owensboro MSA

The following table provides basic MSA demographic data by geography income level.

Demographic Information for Full-Scope Area: Owensboro, KY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	21	10	10	57	19	4
Population by Geography	87,189	6	9	64	21	0
Owner-Occupied Housing by Geography	22,744	4	8	65	23	0
Businesses by Geography	2,848	16	19	45	20	0
Farms by Geography	70	0	6	80	14	0
Family Distribution by Income Level	24,120	21	18	23	38	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,287	10	16	61	13	0
Median Family Income	= \$29,696	Median Housing Value				= \$47,776
HUD Adjusted Median Family Income for 1997	= \$36,800	Unemployment Rate (June 30, 1998)				= 6.6%
Households Below the Poverty Level	= 16%					

Source: 1990 U.S. Census and 1997 HUD updated MFI.

### Lending Test

The total dollar volume of home and small business loans originated in the Owensboro MSA make up 4% of similar loans originated by the bank in all areas.

### Home Loans

During 1996 and 1997, the bank originated 1,391 home loans totaling more than \$84 million. There are no unexplained gaps in home lending distributions. Refer to Table 1, Appendix B, for detail on lending volumes.

### Home Purchase Loans

During 1996 and 1997, the bank originated 818 home purchase loans. Quantitative data relating to the geographic distribution of home purchase loans is found in Table 2, Appendix B. That information shows in low-income geographies, the percentage of bank loans is less than the percentage of owner-occupied housing units. However, the bank's market share in low-income geographies is slightly more than its overall market share. This demonstrates good performance.

In moderate-income geographies, the percentage of bank loans is less than the percentage of owner-occupied housing units, but its market share in these areas is slightly more than its overall market share. This demonstrates good performance.

Quantitative data relating to the distribution of home purchase loans based on borrower income is found in Table 7, Appendix B. That information shows the percentage of bank loans to low-income borrowers is substantially less than the percentage of families designated as low-income. However, the bank's market share in this area exceeds its overall market share. This demonstrates good performance. In lending to moderate-income borrowers, the percentage of bank loans exceeds the percentage of moderate-income borrowers. In addition, the bank's market share is greater than its overall market share. This demonstrates excellent performance.

#### Home Improvement Loans

During 1996 and 1997 the bank made 190 home improvement loans. Quantitative data relating to the geographic distribution of home improvement loans is found in Table 3, Appendix B. That information shows in low-income geographies the percentage of bank loans is less than the percentage of owner-occupied housing units. However, the bank's market share exceeds its overall market share. This demonstrates good performance. In moderate-income geographies, the percentage of bank loans is substantially less than the percentage of owner-occupied housing units. In addition, the bank's market share is substantially less than its overall market share. This demonstrates poor performance.

Quantitative data relating to the distribution of home improvement loans based on borrower income is found in Table 8, Appendix B. That information shows the percentage of bank loans to low-income borrowers is substantially less than the percentage of low-income families. However, the market share for these types of loans exceeds its overall market share. This demonstrates good performance. The percentage of bank loans to moderate-income borrowers is significantly less than the percentage of moderate-income borrowers. In addition, the bank's market share is less than its overall market share. This demonstrates adequate performance.

#### Home Mortgage Refinance Loans

During 1996 and 1997 the bank made 383 home mortgage refinance loans. Quantitative data relating to this is found in Table 4, Appendix B. That information shows in low-income geographies the percentage of bank loans is substantially less than the percentage of owner-occupied housing units. In addition, the bank's market share is substantially less than its overall market share. This demonstrates poor performance. In moderate-income geographies, the percentage of bank loans is substantially less than the percentage of owner-occupied housing units. In addition, its market share is less than its overall market share. This demonstrates poor performance.

Quantitative data relating to the distribution of home mortgage refinance loans based on borrower income is found in Table 9, Appendix B. That information shows the bank's percentage of loans to low-income borrowers is substantially less than the percentage of low-income borrowers. In addition, its market share is significantly less than its overall market share. The percentage of the bank's loans to moderate-income borrowers is significantly less than the percentage of moderate-income borrowers. Also, its market share is significantly less than its overall market share. This demonstrates poor performance.

### Multi-family Home Loans

The bank made no multi-family home loans during the evaluation period.

### **Small Business and Community Development Lending**

In 1997 the bank made 52 small loans to businesses. Quantitative data relating to the geographic distribution of small business lending is found in Table 5, Appendix B. That information shows in low-income geographies, the percentage of bank loans is slightly less than the percentage of businesses located in those geographies (15% vs. 16%). In addition, its market share slightly exceeds its overall market share (5.3% vs. 5%). In moderate-income geographies, the percentage of bank loans is substantially less than the percentage of businesses located in those geographies (10% vs. 19%). In addition, its market share is significantly less than its overall market share (3% vs. 5%). This demonstrates poor performance.

Quantitative data relating to the distribution of small loans to small businesses is found in Table 10, Appendix B. That information shows all of the small loans to businesses made by the bank were to small businesses. This substantially exceeds the 70% of businesses within this MSA considered small businesses. In addition, the percentage of the bank's loans made to small businesses substantially exceeds the percentage of loans made in the aggregate market (100% vs. 68%). Further, the bank's market share of loans to small businesses substantially exceeds its overall market share. This demonstrates excellent performance.

In combination the bank's performance in small business lending is considered adequate.

The bank made no community development loans in this area.

### **Investment Test**

Qualified investments in the Owensboro MSA are relatively low, and consist of one \$1,300 contribution provided to a housing related organization. This investment level is lower than the bank's overall investment performance in Kentucky.

### **Service Test**

Of the seven branches in the MSA, one branch (14%) is located in a moderate-income geography. This percentage is comparable to the percentage of population (9%) that reside within those geographies. Also, the bank has 15 ATMs, 7% of which are in low-income geographies compared to 6% of the population residing in

those geographies. Further, 27% of its ATMs are located in moderate-income geographies which compares favorably to the percentage of the population residing in those areas (9%). More than 34% of the bank's ATMs are located in low- and moderate-income geographies.

All banking services including alternative delivery systems are readily available throughout the MSA. Most of the branches offer extended evening and weekend banking hours. No branches were opened or closed in the MSA since the last evaluation period. A few community development services are provided.

### Analysis of the Central Kentucky Assessment Area

The following table provides demographic data by geography income level in this area:

Demographic Information for Full-Scope Area: Central Kentucky						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	40	NA	7	65	28	NA
Population by Geography	135,312	NA	3	65	32	NA
Owner-Occupied Housing by Geography	35,819	NA	3	64	33	NA
Businesses by Geography	3,798	NA	1	70	29	NA
Farms by Geography	201	NA	1	48	51	NA
Family Distribution by Income Level	38,028	NA	3	64	33	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	13,302	NA	4	76	20	NA
Median Family Income	= \$22,543	Median Housing Value		= \$45,831		
HUD Adjusted Median Family Income for 1997	= \$28,800	Unemployment Rate		= NA		
Households Below the Poverty Level	= 21%					

Source: 1990 U.S. Census and 1997 HUD updated MFI.

### Lending Test

The level of home and small business loans originated in the Central Kentucky assessment area represents 3% of the total loans originated by the bank in all areas. There are no low-income geographies in the assessment area.

## Home Loans

During 1996 and 1997, the bank originated 966 home loans totaling more than \$43 million. There are no unexplained gaps in home lending distributions. The bank originates home loans in all moderate-income geographies. Refer to Table 1, Appendix B, for detail on lending volumes.

### Home Purchase Loans

During 1996 and 1997 the bank made 277 home purchase loans. Quantitative data relating to the geographic distribution of home purchase loans is found in Table 2, Appendix B. That information shows in moderate-income geographies the percentage of bank loans equals the percentage of owner-occupied housing units. In addition, its market share substantially exceeds its overall market share. This demonstrates excellent performance.

Quantitative data relating to the distribution of home purchase loans based on borrower income is found in Table 7, Appendix B. That information shows the percentage of bank loans made to low-income borrowers is substantially less than the percentage of low-income families (3% vs. 30%). In addition, its market share is substantially less than its overall market share (8.8% vs. 14.3%). This demonstrates poor performance. In lending to moderate-income borrowers, the percentage of bank loans is less than the percentage of moderate-income borrowers (11% vs. 15%). In addition, its market share is less than its overall market share (13.1% vs. 14.3%). This demonstrates adequate performance.

### Home Improvement Loans

During 1996 and 1997 the bank made 278 home improvement loans. Quantitative data relating to the geographic distribution of home improvement loans is found in Table 3, Appendix B. That information shows the percentage of bank loans made in moderate-income geographies is substantially less than the percentage of owner-occupied housing units. In addition, its market share is less than its overall market share (12.5% vs. 35.5%). This demonstrates poor performance.

Quantitative data relating to the distribution of home improvement loans based on borrower income is found in Table 8, Appendix B. That information shows the percentage of bank loans made to low-income borrowers is substantially less than the percentage of low-income borrowers (5% vs. 20%). In addition, the bank's market share is significantly less than its overall market share (25.9% vs. 35.5%). This demonstrates poor performance. The percentage of bank loans to moderate-income borrowers is slightly less than the percentage of moderate-income borrowers (13% vs. 15%). However, its market share exceeds its overall market share. This demonstrates good performance.

In combination, home improvement lending is considered adequate.

### Home Mortgage Refinance Loans

During 1996 and 1997 the bank made 411 home mortgage refinance loans. Quantitative data relating to the geographic distribution of home mortgage refinance loans is found in Table 4, Appendix B. That information shows the percentage of bank loans in moderate-income geographies is less than the percentage of owner-occupied housing units (2% vs. 3%). However, its market share is substantially less than its overall market share (0% vs. 21.5%). This demonstrates poor performance.

Quantitative data relating to the distribution of home mortgage refinance loans based on borrower income is found in Table 9, Appendix B. That information shows the percentage of bank loans made to low-income borrowers is substantially less than the percentage of low-income borrowers (4% vs. 20%). However, the bank's market share substantially exceeds its overall market share (38.9% vs. 21.5%). This demonstrates good performance. The percentage of bank loans to moderate-income borrowers is significantly less than the percentage of moderate-income borrowers (9% vs. 15%). However, its market share substantially exceeds its overall market share. This demonstrates good performance.

In combination, home improvement lending is considered adequate.

### **Small Business and Community Development Lending**

In 1997 the bank made 74 small loans to businesses. Quantitative data relating to the geographic distribution of small business lending is found in Table 5, Appendix B. That information shows in moderate-income geographies, the percentage of bank loans substantially exceeds the percentage of businesses located in those geographies (4% vs. 1%). In addition, its market share substantially exceeds its overall market share (75% vs. 5.1%). This demonstrates excellent performance.

Quantitative data relating to the distribution of small loans to small businesses is found in Table 10, Appendix B. That information shows 97% of the small loans to businesses made by the bank were made to small businesses. This substantially exceeds the 76% of the businesses within this assessment area considered small businesses. In addition, the percentage of bank loans made to small businesses substantially exceeds the percentage of loans made in the aggregate market (97% vs. 68%). Further, the bank's market share of loans to small businesses substantially exceeds its overall market share. This demonstrates excellent performance.

In combination the bank's performance in small business lending is excellent.

The bank made no community development loans in this area.

### **Investment Test**

The bank made no qualifying investments in the Central Kentucky assessment area, which is less than the overall investment activity for Kentucky. However, available information did not indicate much opportunity for qualified investments. This demonstrate adequate performance.

**Service Test**

The bank has 8 branches and 8 ATMs in the area. All branches and ATMs are located in middle-income geographies. Despite their location, the branches and ATMs are accessible to low- and moderate-income individuals. Only 3% of the population resides in the moderate-income geographies.

No branches were opened or closed since the last CRA evaluation period. Branches provide extended evening and weekend hours. A few community development services are provided, such as credit counseling.

The bank's performance under the Service Test is adequate.

**APPENDIX A: Summary of Multistate Metropolitan Area and State Ratings**

Rating Area	Performance Tests and Overall CRA Rating			
	Lending Test	Investment Test	Service Test	Overall CRA Rating
State of Ohio	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Cincinnati, OH Multistate MSA	Outstanding	High Satisfactory	Outstanding	Outstanding
State of Indiana	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Kentucky	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Louisville, KY Multistate MSA	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.				



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## APPENDIX B: Content of Standardized Tables

Each table contains bank data for all assessment areas. 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 included:

- 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 Home Mortgage 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 Home Mortgage 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 1. Lending Volume**

LENDING VOLUME												Evaluation Period: January 1, 1996 TO December 31, 1997	
MSA/Assessment Area:	Deposits	Home Mortgage		Small Loans to Businesses		Small Loans to Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area	
	% Bank	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
	% of State												
Multistate MSA 1640 Cincinnati, OH-IN-KY	34%	8,162	\$405,207	1,187	\$153,630	16	\$348	16	\$17,900	9,381	\$577,085	28.2%	
	100%												
Multistate MSA 4520 Louisville, KY-IN	9%	2,846	\$245,499	182	\$28,100	73	\$10,776	0	\$0	3,101	\$284,375	9.30%	
	100%												
INDIANA	3%												
Full Scope													
Eastern Indiana	100%	768	\$22,152	89	\$6,779	42	\$1,809	0	\$0	899	\$30,740	2.70%	
KENTUCKY	8%												
Full Scope													
MSA 5990 Owensboro	37%	1,391	\$84,694	52	\$4,150	0	\$0	0	\$0	1,443	\$88,844	4.30%	
Central Kentucky	29%	966	\$43,363	74	\$6,832	16	\$691	0	\$0	1,056	\$50,886	3.20%	
Limited Scope													
MSA 2440 Evansville-Henderson	3%	95	\$6,054	3	\$1,350	0	\$0	0	\$0	98	\$7,404	0.30%	
MSA 4280 Lexington	25%	1,766	\$139,901	99	\$10,472	18	\$2,403	0	\$0	1,883	\$152,776	5.70%	

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Combined Non-urban AAs	6%	108	\$4,525	16	\$1,019	0	\$0	0	\$0	124	\$5,544	0.40%
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**Table 1. Lending Volume**

LENDING VOLUME												Evaluation Period: January 1, 1996 TO December 31, 1997	
MSA/Assessment Area:	Deposits	Home Mortgage		Small Loans to Businesses		Small Loans to Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area	
	% Bank												
	% of State	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
OHIO	46												
<b>Full Scope</b>													
MSA 1680 Cleveland-Lorain-Elyria	38%	3,298	\$154,347	538	\$61,879	0	\$0	2	\$2,150	3,838	\$218,376	11.50%	
Fayette County	2%	29	\$1,029	5	\$137	2	\$55	0	\$0	36	\$1,221	0.10%	
<b>Limited Scope</b>													
MSA 0080 Akron	6%	865	\$35,412	87	\$13,601	0	\$0	1	\$322	953	\$49,335	2.90%	
MSA 1320 Canton-Massillon	1%	27	\$1,339	3	\$643	0	\$0	0	\$0	30	\$1,982	0.10%	
MSA 1840 Columbus	20%	2,402	\$126,749	322	\$37,063	0	\$0	0	\$0	2,734	\$164,065	8.20%	
MSA 2000 Dayton-Springfield	11%	2,537	\$117,520	430	\$47,675	54	\$2,437	1	\$1,500	3,022	\$169,132	9.10%	
MSA 3200 Hamilton-Middletown	7%	1,565	\$91,756	191	\$24,568	7	\$370	0	\$0	1,763	\$116,132	5.30%	
MSA 3400 Huntington-Ashland	3%	403	\$10,496	62	\$3,580	0	\$0	0	\$0	465	\$14,076	1.40%	
MSA 9320 Youngstown-Warren	< 1%	48	\$4,548	15	\$1,502	0	\$0	0	\$0	63	\$6,050	0.20%	
Combined Non-urban AAs	12%	2,040	\$82,098	262	\$23,190	104	\$4,719	0	\$0	2,406	\$110,007	7.20%	

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE																
Evaluation Period: January 1, 1996 TO December 31, 1997																
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
Multistate MSA 1640 Cincinnati, OH-IN-KY	2%	2%	12%	10%	53%	50%	33%	37%	4	.029	.032	.033	.028	.032	1,759	19%
Multistate MSA 4520 Louisville, KY-IN	4%	3%	16%	13%	45%	39%	35%	45%	2	.052	.087	.061	.048	.052	1,569	17%
<b>INDIANA</b>																
Full Scope																
Eastern Indiana	1%	0%	14%	15%	77%	73%	8%	11%	4	.076	0	.082	.073	.091	124	1%
<b>KENTUCKY</b>																
Full Scope																
MSA 5990 Owensboro	4%	3%	8%	7%	65%	64%	23%	27%	1	.294	.324	.302	.288	.304	818	9%
Central Kentucky	NA	NA	3%	3%	54%	64%	33%	33%	2	.143	NA	.25	.16	.121	277	3%
Limited Scope																
MSA 2440 Evansville-Henderson	4%	2%	8%	4%	88%	94%	NA	NA	5	.004	.059	0	.043	NA	50	< 1%
MSA 4280 Lexington	4%	1%	17%	14%	38%	42%	41%	42%	1	.07	.081	.076	.062	7.7%	1,110	12%
Combined Non-urban AAs	NA	NA	2%	0%	41%	50%	58%	50%	17	.05	NA	0	.006	.004	40	< 1%

(\*) Based on 1996 Aggregate HMDA Data only.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE																Evaluation Period: January 1, 1996 TO December 31, 1997	
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	
<b>OHIO</b>																	
<b>Full Scope</b>																	
MSA 1680 Cleveland-Lorain-Elyria	5%	10%	11%	27%	52%	46%	32%	16%	18	.013	.037	.031	.012	.007	1,071	12%	
Fayette County	NA	NA	28%	40%	72%	60%	NA	NA	9	.023	NA	.02	.024	NA	5	< 1%	
<b>Limited Scope</b>																	
MSA 0080 Akron	3%	5%	14%	19%	59%	45%	24%	30%	53	.004	.009	.006	.003	.005	119	1%	
MSA 1320 Canton-Massillon	2%	0%	14%	33%	61%	17%	23%	50%	16	.001	.0	.001	.0	.001	6	< 1%	
MSA 1840 Columbus	4%	2%	16%	11%	43%	34%	36%	53%	36	.009	.01	.006	.007	.001	554	6%	
MSA 2000 Dayton-Springfield	4%	1%	14%	15%	56%	59%	27%	25%	10	.016	.005	.021	.016	.014	524	6%	
MSA 3200 Hamilton-Middleton	4%	3%	18%	17%	50%	42%	29%	39%	4	.033	.065	.045	.029	.031	411	5%	
MSA 3400 Huntington-Ashland	NA	NA	11%	7%	89%	93%	NA	NA	6	.046	NA	.077	.091	NA	74	< 1%	
MSA 9320 Youngstown	7%	0%	16%	0%	49%	33%	28%	68%	58	.001	0	0	.001	0	15	< 1%	
Combined Non-urban AAs	1%	0%	26%	12%	63%	60%	11%	28%	1	.166	0	.124	.137	.336	536	6%	

(\*) Based on 1996 Aggregate HMDA Data only.



**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT																
Evaluation Period: January 1, 1996 TO December 31, 1997																
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
Multistate MSA 1640 Cincinnati, OH-IN-KY	2%	3%	12%	17%	53%	56%	33%	24%	1	.178	.156	.228	.175	.159	3,545	38%
Multistate MSA 4520 Louisville, KY-IN	4%	2%	16%	19%	45%	46%	35%	34%	8	.039	.016	.04	.037	.046	294	3%
<b>INDIANA</b>																
Full Scope																
Eastern Indiana	1%	1%	14%	21%	77%	71%	8%	7%	1	.382	1.	.36	.361	.696	289	3%
<b>KENTUCKY</b>																
Full Scope																
MSA 5990 Owensboro	4%	3%	8%	4%	65%	70%	23%	23%	2	.29	.313	.182	.32	.237	190	2%
Central Kentucky	NA	NA	3%	1%	64%	77%	33%	22%	1	.355	NA	.125	.458	.211	278	3%
Limited Scope																
MSA 2440 Evansville-Henderson	4%	0%	8%	0%	88%	100%	NA	NA	4	.071	0	0	.238	NA	15	< 1%
MSA 4280 Lexington	4%	3%	17%	22%	38%	51%	41%	24%	3	.049	.035	.053	.052	.043	148	2%
Combined Non-urban AAs	NA	NA	2%	3%	41%	31%	58%	66%	7	.025	NA	.083	.037	.017	32	< 1%

(\*) Based on 1996 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT																
Evaluation Period: January 1, 1996 TO December 31, 1997																
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
<b>OHIO</b>																
<b>Full Scope</b>																
MSA 1680 Cleveland-Lorain-Elyria	5%	9%	11%	17%	52%	51%	32%	23%	5	.042	.03	.037	.042	.052	920	10%
Fayette County	NA	NA	28%	27%	72%	73%	NA	NA	4	.063	NA	.044	.074	NA	11	< 1%
<b>Limited Scope</b>																
MSA 0080 Akron	3%	5%	14%	17%	59%	62%	24%	16%	10	.035	.029	.034	.035	.039	304	3%
MSA 1320 Canton-Massillon	2%	33%	14%	33%	61%	33%	23%	0%	11	0	0	0	0	0	3	< 1%
MSA 1840 Columbus	4%	5%	16%	17%	43%	46%	36%	32%	5	.042	.046	.042	.036	.054	689	7%
MSA 2000 Dayton-Springfield	4%	2%	14%	15%	56%	60%	27%	23%	4	.069	.032	.067	.071	.076	1,067	12%
MSA 3200 Hamilton-Middletown	4%	4%	18%	15%	50%	50%	29%	32%	2	.157	.186	.13	.157	.172	553	6%
MSA 3400 Huntington-Ashland	NA	NA	11%	8%	89%	92%	NA	NA	2	.243	NA	.364	.237	NA	199	2%
MSA 9320 Youngstown-Warren	7%	0%	16%	0%	49%	0%	28%	100%	40	.001	0	0	0	.002	3	< 1%
Combined Non-urban AAs	1%	0%	26%	31%	63%	53%	11%	16%	1	.371	.333	.441	.306	.602	694	7%

(\*) Based on 1996 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE																
Evaluation Period: January 1, 1996 TO December 31, 1997																
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	#	% of Total
Multistate MSA 1640 Cincinnati, OH-IN-KY	2%	2%	12%	11%	53%	56%	33%	31%	2	.054	.055	.055	.058	.049	2,825	26%
Multistate MSA 4520 Louisville, KY-IN	4%	3%	16%	9%	45%	34%	35%	55%	4	.041	.043	.024	.037	.054	972	9%
<b>INDIANA</b>																
Full Scope																
Eastern Indiana	1%	1%	14%	20%	77%	71%	8%	8%	1	.23	.50	.247	.216	.327	353	3%
<b>KENTUCKY</b>																
Full Scope																
MSA 5990 Owensboro	4%	2%	8%	3%	65%	66%	23%	29%	2	.152	.071	.105	.165	.142	383	3%
Central Kentucky	NA	NA	3%	2%	64%	68%	33%	30%	1	.215	NA	0	.319	.128	411	4%
Limited Scope																
MSA 2440 Evansville-Henderson	4%	0%	8%	7%	88%	97%	NA	NA	5	.027	0	.018	.029	NA	29	< 1%
MSA 4280 Lexington	4%	2%	17%	14%	38%	42%	41%	41%	2	.041	.065	.037	.036	.048	507	5%
Combined Non-urban AAs	NA	NA	2%	0%	41%	50%	58%	50%	11	.018	NA	0	.033	.011	36	< 1%

(\*) Based on 1996 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE																
Evaluation Period: January 1, 1997 TO December 31, 1997																
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	#	% of Total
<b>OHIO</b>																
<b>Full Scope</b>																
MSA 1680 Cleveland-Lorain-Elyria	5%	7%	11%	14%	52%	53%	32%	26%	10	.018	.022	.016	.019	.016	1,298	12%
Fayette County	NA	NA	28%	39%	72%	62%	NA	NA	3	.061	NA	.132	.037	NA	13	< 1%
<b>Limited Scope</b>																
MSA 0080 Akron	3%	3%	14%	23%	59%	58%	24%	16%	13	.014	.014	.021	.013	.011	440	4%
MSA 1320 Canton-Massillon	2%	6%	14%	39%	61%	33%	61%	33%	16	.001	0	.005	0	.002	18	< 1%
MSA 1840 Columbus	4%	3%	16%	15%	43%	44%	36%	38%	5	.024	.012	.025	.023	.027	1,157	11%
MSA 2000 Dayton-Springfield	4%	3%	14%	15%	56%	58%	27%	24%	8	.025	.009	.029	.027	.024	930	9%
MSA 3200 Hamilton-Middletown	4%	2%	18%	19%	50%	54%	29%	33%	2	.063	.053	.043	.075	.056	598	5%
MSA 3400 Huntington-Ashland	NA	NA	11%	6%	89%	94%	NA	NA	3	.104	NA	.045	.111	NA	128	1%
MSA 9320 Youngstown	7%	0%	16%	0%	49%	63%	28%	37%	30	.001	0	0	.002	.001	30	< 1%
Combined Non-urban AAs	1%	0%	26%	20%	63%	70%	11%	23%	1	.22	0	.225	.187	.352	808	7%

(\*) Based on 1996 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES																
Evaluation Period: January 1, 1997 TO December 31, 1997																
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	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
<b>Multistate MSA 1640 Cincinnati, OH-IN-KY</b>	7%	7%	14%	11%	49%	41%	30%	40%	5	.091	.101	.08	.079	.108	1,187	33%
<b>Multistate MSA 4520 Louisville, KY-IN</b>	8%	4%	23%	23%	35%	20%	34%	53%	14	.017	.012	.018	.01	.026	182	5%
<b>INDIANA</b>																
Full Scope																
<b>Eastern Indiana</b>	2%	0%	26%	12%	64%	76%	9%	11%	4	.087	0	.04	.114	.075	89	2%
<b>KENTUCKY</b>																
Full Scope																
<b>MSA 5990 Owensboro</b>	16%	15%	19%	10%	45%	39%	20%	37%	6	.05	.053	.03	.043	.07	52	1%
<b>Central Kentucky</b>	NA	NA	1%	4%	70%	55%	29%	41%	7	.051	NA	.75	.051	.046	74	2%
Limited Scope																
<b>MSA 2440 Evansville-Henderson</b>	5%	0%	37%	0%	58%	100%	NA	NA	21	.001	0	0	.002	NA	3	< 1%
<b>MSA 4280 Lexington</b>	7%	1%	28%	18%	33%	48%	32%	33%	11	.022	.006	.018	.026	.022	99	3%

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LS Combined Non-urban AAs	NA	NA	4%	0%	38%	25%	59%	75%	10	.021	NA	0	.014	.02 6	16	< 1
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(\*) Based on 1997 Aggregate Small Business Data only.



**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES																
Evaluation Period: January 1, 1997 TO December 31, 1997																
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	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
<b>OHIO</b>																
<b>Full Scope</b>																
MSA 1680 Cleveland-Lorain-Elyria	9%	8%	10%	10%	44%	39%	33%	42%	10	.029	.03	.029	.026	.033	538	15%
Fayette County	NA	NA	24%	20%	76%	80%	NA	NA	6	.026	NA	.024	.026	NA	5	< 1%
<b>Limited Scope</b>																
MSA 0080 Akron	8%	12%	15%	15%	49%	40%	28%	33%	13	.015	.022	.018	.012	.017	87	2%
MSA 1320 Canton-Massillon	13%	67%	14%	0%	38%	33%	35%	0%	19	.001	.01	0	.001	0	3	< 1%
MSA 1840 Columbus	9%	5%	18%	14%	37%	35%	34%	44%	10	.023	.014	.022	.02	.029	322	9%
MSA 2000 Dayton-Springfield	10%	6%	18%	17%	47%	48%	25%	30%	8	.059	.032	.059	.063	.064	430	12%
MSA 3200 Hamilton-Middletown	9%	3%	19%	8%	46%	60%	25%	29%	5	.067	.034	.047	.075	.067	191	5%
MSA 3400 Huntington-Ashland	NA	NA	26%	23%	74%	77%	NA	NA	1	.32	NA	.667	.277	NA	62	2%
MSA 9320 Youngstown-Warren	NA	NA	4%	0%	46%	13%	50%	87%	25	.003	0	0	.001	.007	15	< 1%
Combined Non-urban AAs	5%	4%	25%	22%	61%	47%	9%	28%	3	.118	.085	.177	.076	.33	263	7%

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

**Table 6. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS																
Evaluation Period: January 1, 1997 TO December 31, 1997																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Multistate MSA 1640 Cincinnati, OH-IN-KY	3%	0%	9%	81%	61%	19%	27%	0%	7	.045	0	.073	.017	0	16	5%
Multistate MSA 4520 Louisville, KY-IN	2%	15%	14%	8%	45%	25%	39%	52%	**	**	**	**	**	**	73	21%
<b>INDIANA</b>																
Full Scope																
Eastern Indiana	0%	0%	8%	2%	82%	95%	10%	8%	3	.235	0	0	.26	.08	42	12%
<b>KENTUCKY</b>																
Full Scope																
MSA 5990 Owensboro	0%	0%	6%	0%	80%	0%	14%	0%	0	0	0	0	0	0	0	0%
Central Kentucky	NA	NA	2%	19%	48%	50%	51%	31%	6	.018	NA	.50	.012	.022	16	5%
Limited Scope																
MSA 2440 Evansville-Henderson	4%	0%	11%	0%	85%	0%	NA	NA	0	0	0	0	0	NA	0	0%
MSA 4280 Lexington	2%	0%	14%	0%	34%	22%	50%	78%	6	.04	0	0	.013	.184	18	5%
Combined Non-urban AAs	NA	NA	3%	0%	39%	0%	58%	0%	0	0	NA	0	0	0	0	0%

(\*) Based on 1997 Aggregate Small Farm Data only.

(\*\*) Information on the market share distribution is not accurate for the Louisville MSA and therefore is not shown.

**Table 6. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS																
Evaluation Period: January 1, 1997 TO December 31, 1997																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
<b>OHIO</b>																
<b>Full Scope</b>																
MSA 1680 Cleveland-Lorain-Elyria	1%	0%	5%	0%	50%	0%	44%	0%	0	0	0	0	0	0	0	0%
Fayette County	NA	NA	14%	0%	86%	100%	NA	NA	6	.019	NA	0	.019	NA	2	1%
<b>Limited Scope</b>																
MSA 0080 Akron	2%	0%	7%	0%	60%	0%	32%	0%	0	0	0	0	0	0	0	0%
MSA 1320 Canton-Massillon	3%	0%	7%	0%	55%	0%	36%	0%	0	0	0	0	0	0	0	0%
MSA 1840 Columbus	3%	0%	13%	30%	48%	70%	36%	0	6	.029	0	.012	.027	0	10	3%
MSA 2000 Dayton-Springfield	2%	0%	13%	7%	61%	91%	25%	2%	2	.157	0	.16	.178	.024	54	16%
MSA 3200 Hamilton-Middletown	4%	0%	7%	0%	59%	100%	30%	0%	2	.092	0	0	.099	0	7	2%
MSA 3400 Huntington-Ashland	NA	NA	20%	0%	80%	0%	NA	NA	0	0	NA	0	0	NA	0	0%
MSA 9320 Youngstown-Warren	0%	0%	4%	0%	45%	0%	51%	0%	0	0	0	0	0	0	0	0%
Combined Non-urban AAs	0%	0%	11%	0%	77%	73%	12%	27%	3	.183	0	0	.165	.329	104	30%

(\*) Based on 1997 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Evaluation Period: January 1, 1996 TO December 31, 1997														
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
Multistate MSA 1640 Cincinnati, OH-IN-KY	20%	12%	17%	23%	24%	24%	39%	38%	4	.029	.058	.035	.029	.032	1,759	19%
Multistate MSA 4520 Louisville, KY-IN	21%	6%	17%	23%	22%	25%	22%	45%	2	.052	.042	.075	.055	.064	1,569	17%
<b>INDIANA</b>																
Full Scope																
Eastern Indiana	20%	7%	21%	19%	25%	32%	34%	41%	4	.076	.049	.07	.088	.087	124	1%
<b>KENTUCKY</b>																
Full Scope																
MSA 5990 Owensboro	21%	9%	18%	22%	23%	30%	38%	37%	1	.294	.327	.325	.366	.277	818	9%
Central Kentucky	20%	3%	15%	11%	19%	17%	46%	68%	2	.143	.088	.131	.166	.168	277	3%
Limited Scope																
MSA 2440 Evansville-Henderson	26%	10%	17%	30%	23%	42%	33%	18%	5	.04	.052	.035	.061	.03	50	< 1%
MSA 4280 Lexington	22%	7%	16%	18%	21%	26%	42%	48%	1	.07	.071	.068	.074	.085	1,110	12%

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Combined Non-urban AAs	14%	0%	16%	5%	20%	30%	51%	65%	17	.005	0	0	.008	.005	40	< 1%
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(\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

(\*\*) Based on 1996 Aggregate HMDA Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Evaluation Period: January 1, 1996 TO December 31, 1997														
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
<b>OHIO</b>																
<b>Full Scope</b>																
MSA 1680 Cleveland-Lorain-Elyria	20%	22%	17%	18%	24%	23%	39%	15%	18	.013	.043	.026	.013	.007	1,071	12%
Fayette County	25%	0%	21%	0%	23%	40%	31%	60%	9	.023	0	0	.036	.038	5	< 1%
<b>Limited Scope</b>																
MSA 0080 Akron	19%	10%	18%	23%	24%	25%	39%	41%	53	.004	.007	.005	.005	.004	119	1%
MSA 1320 Canton-Massillon	18%	0%	18%	17%	25%	33%	39%	50%	16	.001	0	.001	0	0	6	< 1%
MSA 1840 Columbus	19%	15%	18%	15%	24%	24%	39%	44%	36	.016	.029	.006	.008	.011	554	6%
MSA 2000 Dayton-Springfield	20%	16%	18%	24%	24%	25%	38%	34%	10	.016	.03	.018	.016	.017	524	6%
MSA 3200 Hamilton-Middletown	19%	15%	18%	23%	25%	22%	38%	38%	4	.033	.084	.042	.022	.035	411	5%
MSA 3400 Huntington-Ashland	28%	7%	17%	23%	18%	26%	37%	43%	6	.046	.047	.062	.067	.032	74	< 1%
MSA 9320 Youngstown-Warren	22%	0%	19%	7%	22%	27%	38%	67%	58	.001	0	0	.001	.001	15	< 1%
Combined Non-urban AAs	23%	6%	19%	22%	23%	30%	35%	40%	1	.166	.159	.18	.284	.191	536	6%

(\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

(\*\*) Based on 1996 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT																
Evaluation Period: January 1, 1996 TO December 31, 1997																
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
Multistate MSA 1640 Cincinnati, OH-IN-KY	20%	14%	17%	23%	24%	32%	39%	32%	1	.178	.209	.187	.175	.172	3,545	38%
Multistate MSA 4520 Louisville, KY-IN	21%	12%	17%	25%	22%	24%	22%	39%	8	.039	.038	.049	.038	.037	294	3%
<b>INDIANA</b>																
Full Scope																
Eastern Indiana	20%	14%	21%	19%	25%	27%	34%	41%	1	.382	.521	.341	.338	.403	289	3%
<b>KENTUCKY</b>																
Full Scope																
MSA 5990 Owensboro	21%	12%	18%	13%	23%	28%	38%	46%	2	.29	.38	.244	.276	.245	190	2%
Central Kentucky	20%	5%	15%	13%	19%	19%	46%	63%	1	.355	.259	.365	.444	.342	278	3%
Limited Scope																
MSA 2440 Evansville-Henderson	26%	13%	17%	27%	23%	20%	33%	40%	4	.071	.111	.143	.063	.039	15	< 1%
MSA 4280 Lexington	22%	5%	16%	20%	21%	27%	42%	48%	3	.049	.028	.051	.045	.058	148	2%



Combined Non-urban AAs	14%	3%	16%	6%	20%	22%	51%	69%	7	.025	.11 1	.043	.03	.019	32	< 1%
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(\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

(\*\*) Based on 1996 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Evaluation Period: January 1, 1996 TO December 31, 1997														
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
<b>OHIO</b>																
<b>Full Scope</b>																
MSA 1680 Cleveland-Lorain-Elyria	20%	15%	17%	23%	24%	30%	39%	33%	5	.042	.043	.036	.044	.048	920	10%
Fayette County	25%	18%	21%	18%	23%	36%	31%	27%	4	.063	.077	.08	.056	.06	11	< 1%
<b>Limited Scope</b>																
MSA 0080 Akron	19%	15%	18%	22%	24%	36%	39%	27%	10	.035	.044	.036	.042	.026	304	3%
MSA 1320 Canton-Massillon	18%	0%	18%	33%	25%	33%	39%	33%	11	0	0	0	0	0	3	< 1%
MSA 1840 Columbus	19%	9%	18%	22%	24%	32%	39%	37%	5	.042	.042	.05	.04	.044	689	7%
MSA 2000 Dayton-Springfield	20%	9%	18%	19%	24%	31%	38%	41%	4	.069	.052	.062	.069	.089	1,069	12%
MSA 3200 Hamilton-Middletown	19%	9%	18%	24%	25%	27%	38%	39%	2	.157	.142	.16	.141	.186	553	6%
MSA 3400 Huntington-Ashland	28%	8%	17%	19%	18%	30%	37%	43%	2	.243	.276	.28	.25	.219	199	2%
MSA 9320 Youngstown-Warren	22%	0%	19%	0%	22%	0%	38%	100%	40	.001	0	0	0	.002	3	< 1%
Combined Non-urban AAs	23%	13%	19%	23%	23%	29%	35%	35%	1	.371	.388	.406	.363	.361	694	7%

(\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

(\*\*) Based on 1996 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE																
Evaluation Period: January 1, 1996 TO December 31, 1997																
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 Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Multistate MSA 1640 Cincinnati, OH-IN-KY	20%	10%	17%	21%	22%	31%	39%	37%	2	.054	.066	.064	.063	.054	2,825	26%
Multistate MSA 4520 Louisville, KY-IN	21%	4%	17%	12%	22%	21%	22%	59%	4	.041	.015	.029	.036	.065	972	9%
<b>INDIANA</b>																
Full Scope																
Eastern Indiana	20%	8%	21%	20%	25%	31%	34%	41%	1	.23	.205	.213	.248	.271	353	3%
<b>KENTUCKY</b>																
Full Scope																
MSA 5990 Owensboro	21%	5%	18%	10%	23%	23%	38%	55%	2	.152	.099	.10	.128	.187	383	3%
Central Kentucky	20%	4%	15%	9%	19%	14%	46%	72%	1	.215	.389	.35	.229	.228	411	4%
Limited Scope																
MSA 2440 Evansville-Henderson	26%	10%	17%	7%	23%	31%	33%	48%	5	.027	.016	.009	.036	.037	29	< 1%
MSA 4280 Lexington	22%	6%	16%	13%	21%	23%	42%	54%	2	.041	.03	.037	.042	.048	507	5%

										7						
Combined Non-urban AAs	14%	0%	16%	8%	20%	17%	51%	61%	11	.018	0	.034	.009	.017	36	< 1%

(\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

(\*\*) Based on 1996 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE																
Evaluation Period: January 1, 1996 TO December 31, 1997																
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 Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
<b>OHIO</b>																
<b>Full Scope</b>																
MSA 1680 Cleveland-Lorain-Elyria	20%	8%	17%	21%	24%	33%	39%	37%	10	.018	.013	.02	.021	.02	1,298	12%
Fayette County	25%	0%	21%	8%	23%	54%	31%	39%	3	.061	0	0	.125	.069	13	< 1%
<b>Limited Scope</b>																
MSA 0080 Akron	19%	8%	18%	24%	24%	32%	39%	35%	13	.014	.012	.02	.016	.012	440	4%
MSA 1320 Canton-Massillon	18%	6%	18%	39%	25%	28%	39%	28%	16	.001	.002	.001	.001	.001	18	< 1%
MSA 1840 Columbus	19%	7%	18%	17%	24%	32%	39%	44%	5	.024	.019	.021	.031	.03	1,157	11%
MSA 2000 Dayton-Springfield	20%	10%	18%	23%	24%	27%	38%	38%	8	.025	.019	.032	.028	.029	930	9%
MSA 3200 Hamilton-Middletown	19%	8%	18%	19%	25%	28%	38%	43%	2	.063	.067	.059	.076	.071	598	5%
MSA 3400 Huntington-Ashland	28%	6%	17%	23%	18%	24%	37%	45%	3	.104	.143	.118	.118	.099	128	1%

MSA 9320 Youngstown-Warren	22%	0%	19%	10%	22%	30%	38%	60%	30	.001	0	0	.001	.002	30	< 1%
Combined Non-urban AAs	23%	6%	19%	18%	23%	28%	35%	46%	1	.22	.26 2	.202	.206	.25	808	7%

(\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by BANK.

(\*\*) Based on 1996 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Evaluation Period: January 1, 1997 TO December 31, 1997					
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Market Share*		Total Small Loans to Businesses	
	% of Businesses	% BANK Loans	% Market Loans	All	Rev \$1 million or less	#	% of Total
Multistate MSA 1640 Cincinnati, OH-IN-KY	71%	68%	43%	.091	.137	1,187	33%
Multistate MSA 4520 Louisville, KY-IN	69%	93%	37%	.017	.038	182	5%
<b>INDIANA</b>							
Full Scope							
Eastern Indiana	73%	94%	76%	.087	.222	89	2%
<b>KENTUCKY</b>							
Full Scope							
MSA 5990 Owensboro	70%	100%	68%	.05	.085	52	1%
Central Kentucky	76%	97%	81%	.051	.068	74	2%
Limited Scope							
MSA 2440 Evansville-Henderson	74%	33%	69%	.001	.004	3	< 1%
MSA 4280 Lexington	69%	98%	53%	.022	.037	99	3%
Combined Non-urban AAs	72%	100%	51%	.021	.04	16	< 1%

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

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES				Evaluation Period: January 1, 1997 TO December 31, 1997			
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Market Share*		Total Small Loans to Businesses	
	% of Businesses	% BANK Loans	% Market Loans	All	Rev \$1 million or less	#	% of Total
<b>OHIO</b>							
<b>Full Scope</b>							
MSA 1680 Cleveland-Lorain-Elyria	71%	73%	48%	.029	.045	538	15%
Fayette County	71%	100%	73%	.026	.034	5	< 1%
<b>Limited Scope</b>							
MSA 0080 Akron	74%	67%	47%	.015	.021	87	2%
MSA 1320 Canton-Massillon	74%	67%	54%	.001	.001	3	< 1%
MSA 1840 Columbus	69%	80%	45%	.023	.038	322	9%
MSA 2000 Dayton-Springfield	71%	72%	51%	.059	.082	430	12%
MSA 3200 Hamilton-Middletown	73%	71%	52%	.067	.084	191	5%
MSA 3400 Huntington-Ashland	74%	86%	58%	.32	.431	62	2%
MSA 9320 Youngstown-Warren	79%	100%	47%	.003	.006	15	< 1%
Combined Non-urban AAs	75%	73%	56%	.118	.183	262	7%

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

**Table 11. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Evaluation Period: January 1, 1997 TO December 31, 1997					
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Market Share*		Total Small Farm Loans	
	% of Farms	% BANK Loans	% Market Loans	All	Rev \$1 million or less	#	% of Total
Multistate MSA 1640 Cincinnati, OH-KY-IN	91%	100%	98%	0.05	0.05	16	5%
Multistate MSA 4520 Louisville, KY-IN	90%	86%	Inaccurate data	Inaccurate data	Inaccurate data-	70	21%
<b>INDIANA</b>							
Full Scope							
Eastern Indiana	93%	100%	100%	0.24	0.31	42	12%
<b>KENTUCKY</b>							
Full Scope							
MSA 5990 Owensboro	93%	NA	64%	NA	NA	0	0%
Central Kentucky	98%	100%	90%	0.02	0.02	16	5%
Limited Scope							
LSMSA 2440 Evansville-Henderson	93%	NA	89%	NA	NA	0	0%
LS MSA 4280 Lexington	88%	81%	81%	0.04	0.04	18	5%
LS Combined Non-urban AAs	90%	NA	92%	NA	NA	0	0%

(\*) Based on 1997 Aggregate Small Farm Data only.



**Table 11. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS				Evaluation Period: January 1, 1997 TO December 31, 1997			
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Market Share*		Total Small Farm Loans	
	% of Farms	% BANK Loans	% Market Loans	All	Rev \$1 million or less	#	% of Total
<b>OHIO</b>							
<b>Full Scope</b>							
MSA 1680 Cleveland-Lorain-Elyria	91%	NA	81%	NA	NA	0	0%
Fayette County	94%	100%	87%	0.02	0.02	2	1%
<b>Limited Scope</b>							
MSA 0080 Akron	93%	NA	96%	NA	NA	0	0%
MSA 1320 Canton-Massillon	91%	NA	96%	NA	NA	0	0%
MSA 1840 Columbus	92%	100%	91%	0.03	0.04	10	3%
MSA 2000 Dayton-Springfield	91%	100%	80%	0.16	0.17	54	16%
MSA 3200 Hamilton-Middletown	93%	100%	79%	0.09	0.09	7	2%
MSA 3400 Huntington-Ashland	100%	NA	100%	NA	NA	0	0%
MSA 9320 Youngstown-Warren	96%	NA	62%	NA	NA	0	0%
Combined Non-urban AAs	94%	100%	97%	0.18	0.19	104	30%

(\*) Based on 1997 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		Evaluation Period: June 30, 1996 TO March 31, 1998								
MSA/Assessment Areas:	Affordable Housing		Community Development Financial Intermediaries		Other Investments		Grants and Contributions		Total Investments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	(000's)
Multistate MSA 1640 Cincinnati, OH-IN-KY	14	4,709	1	100	2	2,830	135	707	152	8,346
Multistate MSA 3520 Louisville, KY-IN	10	5,056	0	0	0	0	7	19	17	5,075
<b>INDIANA</b>										
Full Scope										
Eastern Indiana	0	0	0	0	0	0	20	40	20	40
<b>KENTUCKY</b>										
Full Scope										
MSA 5990 Owensboro	0	0	0	0	0	0	1	1	1	1
Central Kentucky	0	0	0	0	0	0	0	0	0	0
Limited Scope										
MSA 2440 Evansville-Henderson	0	0	0	0	0	0	0	0	0	0
MSA 4280 Lexington	1	1,106	0	0	0	0	1	6	2	1,112

Combined Non-urban AAs	1	311	0	0	0	0	0	0	1	311
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**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS										
Evaluation Period: June 30, 1996 TO March 31, 1998										
MSA/Assessment Areas:	Affordable Housing		Community Development Financial Intermediaries		Other Investments		Grants and Contributions		Total Investments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	(000's)
<b>OHIO</b>										
<b>Full Scope</b>										
MSA 1680 Cleveland-Lorain-Elyria	5	1,567	1	400	1	250	107	197	114	2,414
<b>Fayette County</b>	0	0	0	0	0	0	0	0	0	0
<b>Limited Scope</b>										
MSA 0080 Akron	4	371	0	0	1	30	26	23	31	424
MSA 1320 Canton-Massillon	1	125	0	0	0	0	2	1	3	126
MSA 1840 Columbus	8	3,018	0	0	0	0	34	96	42	3,114
MSA 2000 Dayton-Springfield	4	972	0	0	0	0	21	27	25	999
MSA 3200 Hamilton-Middletown	0	0	0	0	0	0	13	33	13	33
MSA 3400 Huntington-Ashland	0	0	0	0	0	0	0	0	0	0
MSA 9320 Youngstown-Warren	1	32	0	0	0	0	0	0	1	32
Combined Non-urban AAs	7	2,970	0	0	0	0	0	0	7	2,970

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation Period: June 30, 1996 TO March 31, 1998			
MSA/Assessment Area:	Branches						ATMS						Population				
	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of Bank ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geography				% of the Population within Each Geography				
			Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Multistate MSA 1640 Cincinnati, OH-IN-KY	89	28%	5%	12%	45%	38%	182	29%	6%	10%	49%	35%	7%	15%	50%	27%	
Multistate MSA 4520 Louisville, KY-IN	22	7%	5%	27%	41%	27%	50	8%	5%	24%	33%	38%	8%	19%	42%	31%	
<b>INDIANA</b>																	
Full Scope																	
Eastern Indiana	14	4%	0%	22%	64%	14%	15	2%	7%	7%	73%	13%	1%	19%	73%	7%	
<b>KENTUCKY</b>																	
Full Scope																	
MSA 5990 Owensboro	7	2%	0%	14%	57%	29%	15	2%	7%	27%	53%	13%	6%	9%	64%	20%	
Central Kentucky	8	3%	NA	0%	100%	0%	8	1%	NA	0%	100%	0%	NA	3%	65%	32%	
Limited Scope																	
MSA 2440 Evansville-Henderson	1	< 1	0%	0%	100%	NA	2	< 1%	0%	0%	100%	NA	5%	11%	84%	NA	
MSA 4280 Lexington	4	1%	0%	25%	50%	25%	9	1%	0%	45%	33%	22%	8%	22%	36%	34%	
Combined Non-urban AAs	3	1%	NA	0%	67%	33%	5	1%	NA	0%	60%	40%	NA	1%	51%	48%	

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation Period: June 30, 1996 TO March 31, 1998			
MSA/Assessment Area:	Branches						ATMS						Population				
	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of Bank ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geography				% of the Population within Each Geography				
			Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>OHIO</b>																	
<b>Full Scope</b>																	
MSA 1680 Cleveland-Lorain-Elyria	52	16%	8%	8%	54%	30%	98	15%	7%	9%	53%	31%	10%	14%	48%	27%	
Fayette County	1	< 1%	NA	0%	100%	NA	1	< 1%	NA	0%	100%	NA	NA	28%	72%	NA	
<b>Limited Scope</b>																	
MSA 0080 Akron	17	5%	0%	18%	59%	23%	28	4%	0%	14%	64%	22%	6%	17%	57%	20%	
MSA 1320 Canton-Massillon	1	< 1%	0%	0%	0%	100%	3	1%	0%	0%	33%	67%	4%	16%	58%	22%	
MSA 1840 Columbus	35	11%	3%	20%	46%	31%	101	16%	8%	29%	38%	25%	10%	20%	40%	30%	
MSA 2000 Dayton-Springfield	28	9%	11%	11%	43%	35%	54	9%	6%	11%	43%	40%	7%	18%	52%	23%	
MSA 3200 Hamilton-Middletown	16	5%	6%	6%	63%	25%	26	4%	19%	4%	46%	31%	8%	20%	45%	26%	
MSA 3400 Huntington-Ashland	5	2%	NA	40%	60%	NA	7	1%	NA	14%	86%	NA	NA	13%	87%	NA	
MSA 9320 Youngstown-Warren	1	< 1%	0%	0%	0%	100%	3	1%	0%	0%	0%	100%	11%	17%	44%	28%	
Combined Non-urban AAs	19	6%	11%	11%	53%	25%	28	4%	11%	29%	46%	14%	1%	28%	61%	10%	