



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

March 15, 2004

Community Reinvestment Act Performance Evaluation

**Second National Bank
Charter Number: 2992**

**449 South Broadway Street
Greenville, Ohio 45331**

Office of the Comptroller of the Currency

**Central Ohio Field Office
325 Cramer Creek Court, Suite 101
Dublin, Ohio 43017**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Description of Institution

Second National Bank (SNB) is an intrastate institution headquartered in the city of Greenville, Ohio. SNB has nine full-service offices and eight automatic teller machines (ATMs) throughout its assessment area (AA). The bank has designated all of Darke County and one census tract from Mercer County as its AA. The AA is not located in a metropolitan statistical area, and meets the requirements of the regulation. It does not arbitrarily exclude any low- or moderate-income areas. For additional information on SNB's AA, see the Market Profile-Demographic Information Tables in Appendix A.

SNB became an affiliate of Park National Corporation, Newark, Ohio in 2000. Park National Corporation (PNC) is a \$5 billion holding company and the parent of seven other banks. The acquisition did not alter the bank's lending and service area. Affiliate lending is not included in SNB's Community Reinvestment Act (CRA) performance.

At December 31, 2003, SNB had total assets of \$399.8 million and held \$20 million in Tier 1 capital. Tier 1 capital equals 6.7 percent of total assets. The bank's primary focus is on real estate and consumer lending and to a lesser extent small business and small farm customers. SNB sells most of the fixed rate home loans it originates. It is approximately equal in size to its primary competitor, a commercial bank also headquartered in Greenville. Five other financial institutions provide additional competition with offices located in the AA. For additional information on the products and services offered by SNB, please refer to the bank's CRA Public File.

SNB's performance was rated "Satisfactory" at the prior CRA examination in June 2000.

Evaluation Period

We evaluated SNB's mortgage and small business lending using data for the period beginning January 2001 through December 2003. We did not include 2000 data in our analysis because the accuracy of this information could not be verified. For community development (CD) loans, investments, and services, our evaluation period extends from the ending date of the last CRA examination dated June 26, 2000, through March 15, 2004, the starting date of this evaluation. We conducted two separate analyses. The 1990 census data was used for comparison to years 2001 and 2002, and the 2000 census data was used to analyze 2003 loan data.

Scope of the Evaluation

The bank is not a Home Mortgage Disclosure Act (HMDA) reporter. We sampled home mortgage purchase and refinance loans for the years 2001, 2002, and 2003, and used the results of the sample for our analysis. SNB does report small business/small farm

data. This data was examined prior to the CRA examination and determined to be accurate.

Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**Satisfactory**”.

The following table indicates the performance level of SNB with respect to the lending, investment, and service tests:

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

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Due to SNB’s business focus, we gave the greatest weight to home mortgage loans, followed by small business loans, and finally small farm loans. Within home mortgage loans, refinance loans were weighed more heavily than home purchase loans. This weighing is reflective of SNB’s loan volume by product type over the evaluation period based on available loan origination data.

The local economy is considered stable; however, unemployment in Darke County has grown significantly since the 2000 census when it stood at 2 percent. As of January 2004, unemployment was 6.7 percent compared to Ohio statewide unemployment of 6.2 percent. The closing of two large employers during the past two years negatively impacted the AA employment.

The major factors that support this overall rating and conclusions with respect to performance test are detailed below.

Lending

Refer to Tables 1-A through 9-A in Appendix B for facts and data used to evaluate the bank’s lending in 2001 and 2002. Refer to Tables 1-B through 9-B in Appendix B for facts and data used to evaluate the bank’s lending in 2003.

Performance is rated high satisfactory. The bank's lending performance in the AA is good.

- SNB makes a majority of its loans within its identified AA. Based on our sample of home mortgage lending, the bank made approximately 86 percent of home mortgage loans, 81 percent of small business, and 72 percent of small farm loans inside the AA.
- Overall lending levels reflect good responsiveness to meeting the credit needs of the AA. Relative to its deposit market share of 24 percent and market rank of 2, SNB's home mortgage lending levels are good and the lending levels of its small business and farm loans are excellent. Based on 2001 HMDA peer data, SNB's market share compares favorably with other leading lenders in the market. A specific market share level cannot be stated because SNB was not a HMDA reporter and therefore not included in the peer data. Based on 2002 CRA aggregate data, SNB had a 15 percent market share and a market rank of 2 out of 49 small business lenders in the AA. The bank had a 33 percent market share and rank of 1 out of 23 small farm lenders in the AA.
- SNB's distribution of home purchase and home mortgage refinance loans in moderate-income areas is good. The AA contains one moderate-income geography comprising 8.00 percent of total AA geographies and no low-income geographies. For years 2001 and 2002, SNB granted 10.00 percent and 5.00 percent of home purchase and home mortgage refinance loans, respectively, in the moderate-income geography compared to 6.65 percent of owner occupied units located in this geography. For 2003, SNB granted 10.00 percent and 9.00 percent of its home purchase and home mortgage refinance loans, respectively, in the moderate-income geography compared to 6.27 percent owner occupied units located in this geography.
- Small business and small farm geographic distribution was also good. For years 2001 and 2002, 22.06 percent of small business loans were originated in the moderate-income geography compared to 12.57 percent of businesses located in that geography. In 2003, SNB granted 12.37 percent of its small business loans in the moderate-income geography compared to 14.14 percent of businesses located in that geography. For small farm lending, the bank granted 1.52 percent of its small farm loans in the moderate-income geography in 2001 and 2002 compared to 1.41 percent of small farms located in that geography. In 2003, SNB granted no loans to small farms located in the moderate-income census tract compared to 1.33 percent of small farms located there. However, this limited participation is less significant due there being only 12 small farms in the moderate-income census tract.
- Borrower distribution is also good. Home purchase loans and home mortgage refinance loans to low-income borrowers for the 2001/2002 period were 9.09 percent and 5.00 percent, respectively, compared to 15.27 percent of low-income families in the AA. Loans to moderate-income borrowers were 31.82 percent and 18.00 percent, respectively, compared to 18.33 percent of moderate-income families in the AA. Borrower distribution in 2003 was improved with home purchase loans and home mortgage refinance loans to low-income individuals at 10.00 percent and 11.11 percent, respectively, compared to 15.48 percent of low-

income individuals in the AA. In 2003, SNB originated home purchase and home mortgage refinance loans totaling 30.00 percent and 22.22 percent, respectively, to moderate-income individuals compared to 18.13 percent of moderate-income families in the AA.

- Community Development lending had a neutral impact on the Lending Test. SNB granted one CD loan in the amount of \$20,000, for development of downtown Greenville, a moderate-income area. Six other loans with CD characteristics were granted; however, they did not meet the technical definition of CD loans and were included in other portions of the lending test.

Investments

In evaluating the bank's volume of investments, we considered CD opportunities in the AA, as well as the capacity for the local infrastructure to create qualified investments.

Refer to Table 10-B in Appendix B for facts and data used to evaluate the bank's level of qualified investments.

Performance under the investment test is rated low satisfactory.

The volume of SNB's investments in the AA is adequate. Available investment opportunities within the bank's AA were limited. The bank concentrated its efforts on housing opportunities and invested funds in an Ohio state wide housing corporation that is authorized to construct low- and moderate-income housing projects in the bank's AA. During the review period, the bank made 27 investments totaling \$508,000. Its unfunded commitments, as of December 31, 2003, were \$1.865 million. The investments were not innovative or complex. Additional investments consisted of charitable contributions to eight entities that provide services to low- and moderate-income persons and to four economic development organizations.

Services

Refer to Table 11-B in Appendix B for facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Performance under the service test is rated outstanding.

SNB's offices are readily accessible to geographies and individuals of different income levels throughout its AA. Financial services are reasonably offered at each branch and business hours do not vary in a way that inconveniences any portion of the AA, particularly low- and moderate-income geographies and low- and moderate-income individuals. Some financial services are tailored to assist low- and moderate-income individuals.

No low-income geographies are in the AA. The bank's distribution of branches in the moderate-income geography exceeds the distribution of the population living in that geography. Although the bank's moderate-income geography is inhabited by a relatively small percentage of the AA's population, it is surrounded by middle-income geographies that contain significant numbers of low- and moderate-income families. SNB opened one new branch during the evaluation period. The branch was located in a middle-income geography.

SNB's CD services are good. They include 11 employees providing technical assistance and expertise to 16 organizations.

Fair Lending Review

A Fair Lending Examination was conducted in January 2004. We found no evidence of illegal discrimination or other illegal credit practices.

Appendix A: Market Profile-Demographic Information Tables

Institution ID: 2992 SECOND NATIONAL BANK

1990 Census

Demographic Information for Full Scope Area: SNB Greenville						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	13	0.00	7.69	84.62	7.69	0.00
Population by Geography	58,311	0.00	7.47	86.53	6.00	0.00
Owner-Occupied Housing by Geography	16,060	0.00	6.65	86.71	6.64	0.00
Business by Geography	2,680	0.00	12.57	81.27	6.16	0.00
Farms by Geography	923	0.00	1.41	94.15	4.44	0.00
Family Distribution by Income Level	16,154	15.27	18.33	26.21	40.19	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,428	0.00	10.67	84.64	4.70	0.00
Median Family Income		30,562	Median Housing Value		51,574	
HUD Adjusted Median Family Income for 2002		48,700	Unemployment Rate (1990 US		2.59%	
Households Below Poverty Level		9.19%	Census)			

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 US Census and 2002 HUD updated MFI

2000 Census

Demographic Information for Full Scope Area: SNB Greenville						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	13	0.00	7.69	92.31	0.00	0.00
Population by Geography	58,169	0.00	7.28	92.72	0.00	0.00
Owner-Occupied Housing by Geography	17,006	0.00	6.27	93.73	0.00	0.00
Business by Geography	2,630	0.00	14.14	85.86	0.00	0.00
Farms by Geography	900	0.00	1.33	98.67	0.00	0.00
Family Distribution by Income Level	16,208	15.48	18.13	25.95	40.44	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,447	0.00	10.92	89.08	0.00	0.00
Median Family Income	44,739	Median Housing Value		93,077		
HUD Adjusted Median Family Income for 2003	45,300	Unemployment Rate (1990 US Census)		2.02%		
Households Below Poverty Level	7.59%					

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2003 HUD updated MFI

Appendix B: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As .12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 4. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic

areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table 5. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 6. 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of Refinance Loans** - See Table 6.
- Table 8. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 10B. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected

at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As .12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 11B. 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 MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1-A. Lending Volume

LENDING VOLUME												
Geography: SECOND NATIONAL												
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
SNB Greenville	100.00	878	78,601	485	33,502	395	21,858	1	20	1,759	133,981	24.05

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

** The evaluation period for Community Development Loans is From January 01, 2001 to December 31, 2002.

*** Deposit Data as of December 31, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2-A. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: SECOND NATIONAL				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
SNB Greenville	167	100.00	0.00	0.00	6.65	10.00	86.71	90.00	6.64	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3-A. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: SECOND NATIONAL				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography *				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
SNB Greenville	675	100.00	0.00	0.00	6.65	5.00	86.71	80.00	6.64	15.00	0.00	0.00	0.00	0.18	0.00	

* Based on 2001 Peer Mortgage Data: Central Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4-A. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: SECOND NATIONAL															
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
SNB Greenville	485	100.00	0.00	0.00	12.57	22.06	81.27	69.07	6.16	8.87	15.00	0.00	10.75	8.60	3.73

* Based on 2002 Peer Small Business Data: US and PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2002).

Table 5-A. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: SECOND NATIONAL															
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
SNB Greenville	395	100.00	0.00	0.00	1.41	1.52	94.15	94.18	4.44	4.30	32.30	0.00	23.53	34.13	16.67

* Based on 2002 Peer Small Business Data: US and PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2002).

Table 6-A. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: SECOND NATIONAL					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
SNB Greenville	167	100.00	15.27	9.09	18.33	31.82	26.21	31.82	40.19	27.27	0.00	0.00	0.00	0.00	0.00	

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 1.80% of loans originated and purchased by BANK.

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

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

Table 7-A. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: SECOND NATIONAL					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
SNB Greenville	675	100.00	15.27	5.00	18.33	18.00	26.21	27.00	40.19	50.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 2.96% of loans originated and purchased by BANK.

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

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

Table 8-A. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: SECOND NATIONAL			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
SNB Greenville	485	100.00	79.51	79.59	84.54	8.04	7.42	7.16	15.12

* Based on 2002 Peer Small Business Data: US and PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.24% of small loans to businesses originated and purchased by the bank.

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Table 9-A. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: SECOND NATIONAL			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
SNB Greenville	395	100.00	96.10	98.99	84.05	12.91	3.04	32.30	33.05

* Based on 2002 Peer Small Business Data: US and PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.51% of small loans to farms originated and purchased by the bank.

Table 1-B. Lending Volume

LENDING VOLUME												
Geography: SECOND NATIONAL BANK												
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003												
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:	100.00	613	56,724	186	14,410	168	10,219	0	0	967	81,353	24.00

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

** The evaluation period for Community Development Loans is From June 26, 2000 to March 15, 2004.

*** Deposit Data as of December 31, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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Table 2-B. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: SECOND NATIONAL BANK					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
SNB Greenville	133	100.00	0.00	0.00	6.27	10.00	93.73	90.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on Peer Data is not available.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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Table 3-B. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: SECOND NATIONAL BANK					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography *				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
SNB Greenville	452	100.00	0.00	0.00	6.27	9.00	93.73	91.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on Peer Data is not available.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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Table 4-B. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: SECOND NATIONAL BANK															
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [†]				
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
SNB Greenville	186	100.00	0.00	0.00	14.14	12.37	85.86	87.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on Aggregate Small Business Data Only.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2003).

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Table 5-B. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: SECOND NATIONAL BANK															
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [†]				
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
SNB Greenville	168	100.00	0.00	0.00	1.33	0.00	98.67	100.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on Aggregate Small Farm Data Only.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Table 6-B. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: SECOND NATIONAL BANK					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share [*]				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
SNB Greenville	133	100.00	15.48	10.00	18.13	30.00	25.95	30.00	40.44	30.00	0.00	0.00	0.00	0.00	0.00	

* Based on Peer Data is not available.

** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by BANK.

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

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

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Table 7-B. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: SECOND NATIONAL BANK					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share [*]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
SNB Greenville	452	100.00	15.48	11.11	18.13	22.22	25.95	22.23	40.44	44.44	0.00	0.00	0.00	0.00	0.00	

* Based on Peer Data is not available.

** As a percentage of loans with borrower income information available. No information was available for 0.44% of loans originated and purchased by BANK.

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

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

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Table 8-B. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: SECOND NATIONAL BANK			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
SNB Greenville	186	100.00	68.82	82.26	82.80	12.37	4.84	0.00	0.00

* Based on Aggregate Small Business Data Only.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

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Table 9-B. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: SECOND NATIONAL BANK			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
SNB Greenville	168	100.00	95.00	100.00	83.33	13.10	3.57	0.00	0.00

* Based on Aggregate Small Business Data Only.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

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Table 10-B. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: SECOND NATIONAL BANK				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003		
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
SNB Greenville	0	0	27	508	27	508	100.00	3	1,865

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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Table 11-B. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: SECOND NATIONAL BANK																	
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
SNB Greenville	100.00	9	100	0.00	22.22	77.78	0.00	1	0	0	0	1	0	0.00	7.28	92.72	0.00

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Table 12-B Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																		
Geography: SECOND NATIONAL BANK																		
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																		
MA/Assessment Area:	Deposits	Branches						ATMs						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																		
SNB Greenville	100.00	9	100	0.00	22.22	77.78	0.00	8	100.00	0	22.00	78.00	0	0.00	25.00	75.00	0.00	