



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

PUBLIC DISCLOSURE

November 15, 2004

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Knox National Bank
Charter Number 7638**

**One South Main Street
Mount Vernon, Ohio 43050**

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

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Description of Institution

First Knox National Bank (FKNB) is an intrastate community bank, with its main office located in the city of Mount Vernon, Ohio, approximately 45 miles northeast of Columbus, Ohio. FKNB is a wholly owned subsidiary of the Park National Corporation, a \$5 billion, eight-bank holding company headquartered in Newark, Ohio. The bank's primary business focus is retail/commercial banking and it offers traditional products and services through a network of 14 offices, one loan production office and eight stand alone ATMs. All but two of the offices contain an ATM to provide 24-hour banking. The bank offers both telephone and Internet banking services. In addition, the bank is active in the secondary mortgage market, selling most originations with servicing retained. Overall competition for loans and deposits within the bank's marketing area is moderate, and comes primarily from several local community banks and branches of regional institutions. Currently no legal or economic impediments exist that could restrict the institution's ability to serve the community's credit needs. The bank was last reviewed for its CRA performance in February 2001 and was rated "Outstanding."

As of September 30, 2004, FKNB reported total assets of \$750 million, Tier One capital of \$52 million, with net loans representing about 63% of assets. Loans for one-to-four family residential housing purposes represented about 44% of gross loans, with the remainder divided among loans having commercial/commercial real estate, individual or agricultural purposes. The table below shows the bank's approximate loan mix as of September 30, 2004.

Loan Mix as of September 30, 2004*		
Loan Type	\$ '000s	Percentage
Residential Real Estate	212,591	44
Commercial Real Estate	101,463	21
Loans to Individuals	96,632	20
Commercial/Industrial	67,643	14
Agricultural	<u>4,832</u>	<u>1</u>
Totals	483,161	100

Source: September 30, 2004 Uniform Bank Performance Report

*Based on gross loans as of September 30, 2004

Under the 1990 Census data, the bank had two assessment areas (AAs). The first and primary AA (full-scope) contains over 95% of the bank's lending activity and includes 34 non-Metropolitan Statistical Area (MSA) geographies representing all of Knox, Morrow, Holmes and Ashland Counties. This non-MSA area contained zero low-, two (6%) moderate-, 29 (85%) middle- and three (9%) upper-income geographies and was given the greatest weight in our overall analysis due to the level of activity. This AA contains all but one of the bank's branches, including one located in a moderate-income area. Two of these offices were opened since the last evaluation. The bank has a deposit market share of 27% in this AA as of June 30, 2004, which makes it the number one deposit holder in this area. The second AA represents four census tracts (three upper-income and one middle-income) of the Mansfield, Ohio MSA #4800, incorporating the

southern and eastern most portions of Richland County and contains the remaining branch location. This AA was selected for a limited scope review as it contains only about 5% of the bank's total lending activity. In addition, the bank maintains only 2% of the MSA deposits, which places it as the tenth largest deposit holder in this area.

Under the 2000 Census data, the bank again has two AAs (non-MSA and MSA). The first and primary (full-scope) AA (non-MSA) again represents over 95% of all lending activity and includes 34 non-MSA census tracts comprising the same counties noted in the 1990 census noted above. However, the updated census data now shows the AA with no low- and/or moderate-income tracts. The MSA AA now represents six tracts of the Mansfield, Ohio MSA, which is now listed as MSA #3190. Although the MSA number changed, the six tracts continue to note no low- and/or moderate-income tracts. The bank continues to have one branch in this AA.

FKNB noted another change in its AA composition since the 2000 census data was released. Morrow County was subsequently designated as an MSA effective for the 2004 data year. The Morrow County MSA #1814 now represents a third AA for the bank, but again these changes affect only the data for 2004 and beyond. This AA continues to contain six tracts, but one (17%) has now been designated as a moderate-income tract, with the remaining five (83%) consisting of middle-income tracts. Through six months of 2004, this AA accounted for only 5% of all reported year-to-date lending activity. FKNB has two branches in this AA and is the number one deposit holder with 31% of all MSA deposits.

All AAs are contiguous and completely surround the bank's offices. The AAs meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income areas. A brief summary of key demographic data for the full scope AA (non-MSA) is provided in appendix A.

Evaluation Period

We evaluated FKNB's HMDA, small business and small farm data for the period beginning January 1, 2001 through December 31, 2003. For community development loans, investments and services, our evaluation period runs from the ending date of the last CRA examination which is February 20, 2001 through November 15, 2004, the starting date of this evaluation.

The evaluation period incorporates two different census periods (1990 and 2000) so analysis and conclusions will be segregated by census year. HMDA and CRA loan data for the years of 2001 and 2002 is compared to demographic information based on the 1990 census, while the 2003 data is compared to the demographic information supplied by the 2000 census. Due to further changes in the census information for 2004, year-to-date 2004 data was not included in this evaluation.

Overall CRA Rating

INSTITUTION'S CRA RATING: This institution is rated **Outstanding**.

The following table indicates the performance level of **First Knox National Bank** with respect to the lending, investment, and service tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

In our evaluation of FKNB’s lending performance, we gave the greatest weight to residential real estate loans as they represent 44% of the bank’s loan portfolio and continue to be a significant focus of bank lending activities. Home refinance lending and home purchase lending received the most weight in the analysis as these products represented 74% and 20%, respectively, of the bank’s total home mortgage lending during the review period. Minimal weight was given to home improvement lending as it represented only 6% of the total residential real estate loans. In addition, the difficulty that low-income borrowers have in obtaining home mortgage loans in the AA was factored in our analysis. We considered the percentage of households that live below the poverty level and the cost of housing in the AA when determining performance in lending to low-income borrowers. Affordable housing loans were also identified as a significant credit need in the community according to community contacts completed during the examination. We also considered other loan products including small business and small farm loans in our evaluation of the bank’s lending performance.

As the bank noted no low- or moderate-income tracts in the full scope review AA under the 2000 census data, analysis by income geography would not be meaningful and was not performed for this period.

The major factors that support this overall rating and conclusions with respect to performance tests:

Lending

Refer to Tables 1 through 12 in appendix B for facts and data used to evaluate the bank's lending.

FKNB's lending performance is Outstanding.

The bank's lending performance in the non-MSA AA is excellent. The performance in the limited-scope MSA AA is weaker, but considered good. The MSA area is weaker based on the level of lending to low-income borrowers in this AA, but had no impact on overall performance.

- FKNB's overall lending levels reflect an excellent responsiveness to meeting the credit needs of the AA. Based on 2002 HMDA data, FKNB had a lending market share of 6% and ranked second out of 312 HMDA lenders operating in the AA for overall volume. This compares favorably to the bank's deposit market share of 27% and number one ranking in this area, considering that only a large national lender with a lending market share of 8% exceeded the bank for total AA HMDA activity. Based on 2002 CRA (small business & small farm) aggregate data, FKNB had a 15% market share and ranked second out of 53 small business/small farm lenders in the AA for overall lending volume. Again, only a large national lender with a market share of 17% exceeded the bank for originations in this area.

1990 Census data:

- The bank makes a substantial majority of its loans within its identified AA. Based on 2001 and 2002 data, FKNB made approximately 93% of its HMDA reportable (home purchase, home improvement and mortgage refinance) loans and 85% of its small business/small farm loans inside the AA. The bank also originated loans in all tracts within the AA.
- The distribution of FKNB's HMDA reportable loans to low-income borrowers is excellent. Home purchase, home improvement and mortgage refinance loans to low-income borrowers represented 11%, 23% and 8%, respectively. The borrower distribution of home improvement loans (23%) is well above the AA demographic of 18%, but home purchase and home improvement loans are below the AA standard. Although performance for two products is below the AA demographics, activity can be considered excellent when considering the difficulty that a low-income person has for home mortgages in the AA. A low-income person earns less than \$24,350 based on the HUD adjusted median family income. Approximately 14% of AA households are below the poverty level. These borrowers may have trouble meeting standard credit criteria, as well as affording the \$50,708 median housing cost. In addition, the bank's market share of low-income borrowers significantly exceeds its overall product market share for all HMDA products.

- FKNB's distribution of HMDA loans to moderate-income borrowers is excellent. The bank made 24% of its home purchase loans, 24% of its home improvement loans and 21% of its mortgage refinance loans to moderate-income borrowers who represent 20% of the borrowers in the AA. The bank's market shares for making these loans to moderate-income borrowers exceed its overall market share for home improvement loans and are comparable to the overall market share for the remaining two HMDA products.
- FKNB's record of lending to small business and small farms is excellent. The bank made approximately 87% of its small business loans and 99% of its small farm loans to businesses and farms with revenue \$1 million and under. This performance exceeds the demographics showing that 79% of all AA businesses and 97% of AA farms have revenue \$1 million and under. The bank's market share for business with revenues under \$1 million significantly exceeds its overall market share in this area. The bank's market share for farms with revenue of under \$1 million exceeds its overall market share for this type of credit. Additionally, approximately 94% of all loans to small farms and 83% of all loans to small businesses were made in small amounts of \$100 thousand or less.
- FKNB's distribution of HMDA reportable loans to moderate-income areas is excellent, especially in the areas of home purchase loans and loans for mortgage refinance. Home improvement lending to these areas is poor, but again this product represents only 6% of the bank's total HMDA reportable loans. The bank made 14% of its home purchase loans, 2% of its home improvement loans and 8% of its mortgage refinance loans to moderate-income areas. This dispersion significantly exceeds the AA demographic showing that 5% of all AA owner occupied housing is contained in moderate-income areas. The bank's market share for HMDA-reportable loans in moderate-income areas for home purchase and mortgage refinance loans is also well above its overall market share for these lending products, but is below its market share for home improvement loans.
- The bank's record of making small loans to businesses and small farms in moderate-income areas is good. The bank made 4.36% of its small business loans to moderate-income areas compared to the AA demographic showing that 4.88% of all AA businesses are in moderate-income areas. The bank made no farm loans in moderate-income areas during the evaluation period, but only 1% (about 14 farms) of all AA small farms are located in these geographies. The bank's market share for small business loans in moderate-income areas exceeds its overall product market share, but is significantly below its overall market share for small farm loans in moderate-income areas.

2000 Census data:

- The bank makes a substantial majority of its loans within its identified AA. Based on 2003 data, FKNB made approximately 94% of its HMDA reportable (home purchase, home improvement and mortgage refinance) loans and 87% of its small

business/small farm loans inside the AA. The bank also originated loans in all tracts within the AA.

- The distribution of FKNB’s HMDA loans to low-income borrowers is excellent. . Home purchase, home improvement and mortgage refinance loans to low-income borrowers represented 14%, 20% and 11%, respectively. The borrower distribution of home improvement loans (20%) is well above the AA demographic of 16%, but home purchase and home improvement loans are below the AA standard. Although performance for two products is below the AA demographics, activity can be considered excellent when considering the difficulty that a low-income person has for home mortgages in the AA. A low-income person earns less than \$25,300 based on the HUD adjusted median family income. Approximately 11% of AA households are below the poverty level. These borrowers may have trouble meeting standard credit criteria, as well as affording the \$86,300 median housing cost.
- FKNB’s distribution of HMDA loans to moderate-income borrowers is excellent. The bank made 24% of its home purchase loans, 23% of its home improvement loans and 23% of its mortgage refinance loans to moderate-income borrowers who comprise 20% of the borrowers in the AA.
- FKNB’s record of lending to small business and small farms is excellent. The bank made approximately 75% of its small business loans and 98% of its small farm loans to businesses and farms with revenue under \$1 million. This performance exceeds the demographics showing that 69% of all AA businesses and 97% of AA farms have revenue under \$1 million. Additionally, approximately 89% of all loans to small farms and 78% of all loans to small businesses were made in small amounts of \$100 thousand or less.
- The bank’s community development lending had a neutral impact on lending performance. FKNB originated one qualified loan for \$50 thousand during the review period, which represents a construction line of credit to Habitat for Humanity of Morrow County, a nonprofit entity whose primary purpose is to create or improve affordable housing units for low- and/or moderate-income persons.

Innovative or Flexible Lending Programs:

- Innovative or flexible lending programs had a positive impact on lending performance. FKNB actively participates in loan programs focusing on low- and/or moderate-income borrowers including:
 - The USDA Rural Housing Development program, which is targeted to low- and/or moderate-income borrowers. During the entire evaluation period, the bank originated 13 loans for \$1.4 million;
 - The Knox County Community Housing Improvement Program (CHIP) Home Buyer Assistance program, which provides low- or moderate-income borrowers with down payment assistance to purchase a home. The bank

originated one loan for \$85 thousand during the evaluation period and was the only financial institution participating in this program;

- The Knox County CHIP rental rehabilitation program, which provides low-cost home improvement funds to owners of low- and moderate-income rental-housing units. FKNB has committed to lend \$80 thousand to qualifying participants in this program, but has noted no originations to date;
- FKNB has also joined the Welcome Home loan program sponsored by the Federal Home Loan Bank, which focuses on low- and/or moderate-income homebuyers.

Investments

We assessed the bank's investment performance by evaluating the volume of community development investments relative to the needs and opportunities for investments within the area. There are limited opportunities for financial institutions to purchase qualified investment securities in the AA, but the community has needs being addressed by groups and organizations that would benefit from financial contributions (donations and grants) by the bank.

Refer to Table 14 in appendix B for facts and data used to evaluate the bank's level of qualified investments.

FKNB's performance under the investment test is rated High Satisfactory. In the non-MSA AA, performance is good. The bank's performance in the limited MSA AA is weaker, but adequate as there are fewer qualifying investments. The non-MSA AA is given the most weight since this AA contains the bank's largest volume of deposits and loans.

- FKNB's has a good level of qualified community development investments. Direct investments funded during the evaluation period represent \$1.2 million in low-income tax credits issued to support the creation or rehabilitation of affordable housing projects throughout the entire State of Ohio, and have the potential to benefit the bank's AA. These tax credits are purchased by the bank's parent company through the Ohio Capital Corporation, with a percentage allocated to each affiliate bank. These investments are not considered complex or innovative. In addition to the current funded amount, the remaining book balance of prior period qualified investments represents another \$336 thousand. Prior period investments were given positive consideration because they continue to help meet affordable housing needs within the AA and/or the broader State of Ohio area. Unfunded commitments to these projects representing another \$3.8 million.
- An additional \$34 thousand in qualifying contributions were made to organizations and groups promoting affordable housing and providing support to

low- and moderate-income individuals and families. Contributions are made directly by the FKNB, as well through a sizable charitable foundation created by the bank to provide additional financial support to the community.

Services

In evaluating FKNB's services, we considered its branch network in relation to the AA composition and population distribution. We also assessed the adequacy of community development services provided by the bank.

Refer to Table 15 in appendix B for facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FKNB's performance under the service test is rated High Satisfactory. Performance in the non-MSA AA is good. Performance in the limited scope MSA AA is weaker but adequate, as the AA contains no low- or moderate-income tracts and noted fewer community development services.

- FKNB's offices, ATMs and retail services are accessible to geographies and individuals of all income levels.
 - Based on the 1990 census data for the non MSA AA, the bank currently has one (8%) branch located in a moderate-income geography, which exceeds the percentage of population in those geographies, with the remainder located in middle-income tracts. However, this branch is dedicated to the occupants of a retirement center (The Living Center). The bank added one new full service office in this AA during this review period (2002 - Wal-Mart), which was located in a middle-income area. Overall, the branch dispersion is good when considering that these moderate-income tracts are surrounded by middle-income geographies that contain FKNB offices (the main office and Coshocton Ave.) that are accessible to these geographies. In fact, the main office is actually within a reasonable walk from one of the moderate-income tracts and both offices are within three miles of the furthest point of the moderate-income tracts. We also considered that only 5.49% of the population resides in moderate-income geographies, and that only two moderate-income geographies (6%) are in the AA. Eighty-Five percent of the AA population resides in middle-income tracts and 9% live in upper-income tracts. In addition, the analyses contained in Lending Test portion of this review document that the bank is successfully serving the moderate-income areas, as its home mortgage lending in these areas was found to be excellent and its small business/small farm lending was found to be good. The extended hours at several locations (including Coshocton Ave.) further enhance accessibility.
 - The bank noted no low- or moderate-income geographies based on the 2000 census data, which now shows that 99% of the AA population and 100% of

the bank's branches are located in middle-income tracts. FKNB added one additional location during this review period (2003 - Blackjack Rd), which is also located in a middle-income tract.

- FKNB's community development services are good. They include:
 - Three employees providing technical assistance and expertise to community action groups supporting low and/or moderate income families (Morrow County Family & Children's Services, Kokosing Early Childhood Centers and Mount Vernon Developmental Center Diversified Products & Services Board);
 - One employee providing technical assistance and expertise to an affordable housing action group in Knox County (Metropolitan Housing Advisory Committee);
 - Four employees also work with the Knox County Career Center to offer a Customer Service Certification Training Program. This program is designed to assist unemployed, laid-off or minimum wage workers (80% - 90% are living at or below the poverty level) become certified in entry-level customer service work, thereby enhancing their ability to find employment. FKNB assumed a leadership role with this program and has been instrumental in both its initial and ongoing development;
 - Two employees providing technical assistance and expertise to Habitat for Humanity of Morrow County to obtain a \$40 thousand federal funding grant to support affordable housing in the AA (Bonner Farms project).

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of illegal discrimination or other illegal credit practices.

Appendix A: AA Demographic Detail

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Non-MSA AA

Demographic Information for Full Scope Area: Mt Vernon Non MSA AA –1990 Census data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	34	0.00	5.88	85.29	8.82	0.00
Population by Geography	155,578	0.00	5.49	85.10	9.40	0.00
Owner-Occupied Housing by Geography	40,111	0.00	4.95	86.60	8.46	0.00
Business by Geography	8,093	0.00	4.88	86.66	8.46	0.00
Farms by Geography	1,223	0.00	1.14	95.58	3.27	0.00
Family Distribution by Income Level	41,399	17.87	20.41	24.74	36.97	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,848	0.00	8.09	87.17	4.74	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		30,562 48,700 13.59%	Median Housing Value Unemployment Rate (1990 US Census)		50,708 3.39%	

Source: 1990 US Census and 2002 HUD updated MFI. (*) The NA category consists of geographies that have not been assigned an income classification.

Demographic Information for Full Scope Area: Mt Vernon Non MSA – 2000 Census data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	34	0.00	0.00	97.06	2.94	0.00
Population by Geography	177,594	0.00	0.00	98.51	1.49	0.00
Owner-Occupied Housing by Geography	48,060	0.00	0.00	98.14	1.86	0.00
Business by Geography	8,084	0.00	0.00	98.19	1.81	0.00
Farms by Geography	1,183	0.00	0.00	96.20	3.80	0.00
Family Distribution by Income Level	46,815	16.48	19.63	25.63	38.26	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	16,903	0.00	0.00	98.58	1.42	0.00
Median Family Income HUD Adjusted Median Family Income for 2003 Households Below Poverty Level		44,739 50,600 10.86%	Median Housing Value Unemployment Rate (9/30/04)		86,300 4.90%	

Source: 2000 US Census and 2003 HUD updated MFI. (*) The NA category consists of geographies that have not been assigned an income classification

Appendix B: Tables of Performance Data

Content of Standardized Tables

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.
- 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 Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily 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 multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. 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 7. 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 8. 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 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. 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 12. 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 13. NOT ELECTED AND NOT INCLUDED. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle-, and

upper-income borrowers and geographies to the percentage distribution of households by income level in each MA/assessment area.

Table 14. 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.

Table 15. 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.

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Table 1. Lending Volume

LENDING VOLUME		Geography: MT VERNON 1990				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002						
MA/Assessment Area:	% 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:												
Non MSA – 1990 census	92.73	1,673	156,012	1,330	103,163	340	11,553	0	0	3,343	270,728	95.00
Limited Review:												
Mansfield MSA – 1990 census	7.27	169	15,553	85	6,867	8	380	0	0	262	22,800	5.00

LENDING VOLUME		Geography: MT VERNON 2000				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						
MA/Assessment Area:	% 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:												
Non MSA – 2000 Census	93.70	1,100	102,685	755	66,213	167	7,093	1	50	2,022	175,991	95
Limited Review:												
Mansfield MSA – 2000 census	6.30	93	7,579	38	2,970	5	253	0	0	136	10,802	5

^{*} Loan Data as of December 21, 2002. Rated area refers to either state or multi-state MA rating area.
^{**} The evaluation period for Community Development Loans is from February 20, 2001 to November 15, 2004.
^{***} Deposit Data as of June 30, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.
[@] Loan Data as of December 31, 2003. Rated area refers to either state or multi-state rating area.
^{@@} The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2003.
^{@@@} Deposit Data as of November 16, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MT VERNON 1990					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:																
Non MSA – 1990 Census	354	94.15	0.00	0.00	4.95	13.56	86.60	80.23	8.46	6.21	7.04	0.00	14.72	6.47	6.39	
Limited Review:																
Mansfield MSA – 1990 Census	22	5.85	0.00	0.00	0.00	0.00	28.70	68.18	71.30	31.82	2.66	0.00	0.00	9.77	0.64	

Geographic Distribution: HOME PURCHASE		Geography: MT VERNON 2000					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:																
Non MSA – 2000 Census	204	95.77	0.00	0.00	0.00	0.00	98.14	99.02	1.86	0.98	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Mansfield MSA – 2000 Census	9	4.23	0.00	0.00	0.00	0.00	28.75	77.78	71.25	22.22	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (CE)

** 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 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.

@@ Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MT VERNON 1990					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Home Improvement 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:																
Non MSA – 1990 census	100	87.72	0.00	0.00	4.95	2.00	86.60	92.00	8.46	6.00	18.40	0.00	8.33	18.75	19.23	
Limited Review:																
Mansfield MSA- 1990 census	14	12.28	0.00	0.00	0.00	0.00	28.70	71.43	71.30	28.57	11.11	0.00	0.00	19.51	5.17	

Geographic Distribution: HOME IMPROVEMENT		Geography: MT VERNON 2000					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement 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:																
Non MSA – 2000 Census	70	88.61	0.00	0.00	0.00	0.00	98.14	97.14	1.86	2.86	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Mansfield MSA –2000 Census	9	11.39	0.00	0.00	0.00	0.00	28.75	55.56	71.25	44.44	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2002 Peer Mortgage Data (CE)

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

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

[@] Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{@@} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MT VERNON 1990				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							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Non MSA – 1990 census	1,219	90.16	0.00	0.00	4.95	8.04	86.60	87.20	8.46	4.76	11.24	0.00	18.89	11.23	6.76	
Limited Review:																
Mansfield MSA - 1990 Census	133	9.84	0.00	0.00	0.00	0.00	28.70	75.94	71.30	24.06	5.45	0.00	0.00	15.10	1.85	

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MT VERNON 2000				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							
	#	% of Total@	% Owner Occ Units@@	% BANK Loans	% Owner Occ Units@@	% BANK Loans	% Owner Occ Units@@	% BANK Loans	% Owner Occ Units@@	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Non MSA – 2000 Census	826	91.68	0.00	0.00	0.00	0.00	98.14	94.79	1.86	5.21	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Mansfield MSA – 2000 Census	75	8.32	0.00	0.00	0.00	0.00	28.75	73.33	71.25	26.67	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (CE)

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

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

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

@@ Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MT VERNON 1990					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]					
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Non MSA – 1990 Census	0	0.00	0.00	0.00	13.84	0.00	66.15	0.00	20.01	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Mansfield MSA –1990 census	0	0.00	0.00	0.00	0.00	0.00	12.77	0.00	87.23	0.00	0.00	0.00	0.00	0.00	0.00	

Geographic Distribution: MULTIFAMILY		Geography: MT VERNON 2000					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total [@]	% of MF Units ^{@@}	% BANK Loans	% MF Units ^{@@}	% BANK Loans	% MF Units ^{@@}	% BANK Loans	% MF Units ^{@@}	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Non MSA – 2000 Census	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Mansfield MSA – 2000 Census	0	0.00	0.00	0.00	0.00	0.00	12.44	0.00	87.56	0.00	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

^{***} Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 1990 Census information.

[@] Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

^{@@} Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

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Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MT VERNON 1990					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
Non MSA – 1990 census	1,330	93.99	0.00	0.00	4.88	4.36	86.66	91.73	8.46	3.91	13.36	0.00	15.35	14.80	8.15	
Limited Review:																
Mansfield MSA – 1990 census	85	6.01	0.00	0.00	0.00	0.00	25.89	82.35	74.11	17.65	2.28	0.62	1.05	4.09	0.92	

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MT VERNON 2000					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total@	% of Businesses@@	% BANK Loans	% of Businesses@@	% BANK Loans	% of Businesses@@	% BANK Loans	% of Businesses@@	% BANK Loans						
Full Review:																
Non MSA – 2000 Census	755	95.21	0.00	0.00	0.00	0.00	98.19	95.89	1.81	4.11	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Mansfield MSA – 2000 Census	38	4.79	0.00	0.00	0.00	0.00	26.38	76.32	73.62	23.68	0.00	0.00	0.00	0.00	0.00	

* 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).

@ 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 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MT VERNON 1990					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:															
Non MSA –1990 census	340	97.70	0.00	0.00	1.14	0.00	95.58	100.00	3.27	0.00	37.27	0.00	0.00	37.79	0.00
Limited Review:															
Mansfield MSA – 1990 census	8	2.30	0.00	0.00	0.00	0.00	43.94	62.50	56.06	37.50	13.33	0.00	0.00	15.79	11.11

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MT VERNON 2000					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:															
Non MSA – 2000 Census	167	97.09	0.00	0.00	0.00	0.00	96.20	92.81	3.80	7.19	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Mansfield MSA – 2000 Census	5	2.91	0.00	0.00	0.00	0.00	46.28	80.00	53.72	20.00	0.00	0.00	0.00	0.00	0.00

* 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).

@ 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).

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Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MT VERNON 1990					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:																
Non MSA – 1990 census	354	94.15	17.87	10.51	20.41	24.15	24.74	28.41	36.97	36.93	7.95	15.79	6.62	6.17	8.67	
Limited Review:																
Mansfield MSA– 1990 census	22	5.85	10.07	9.09	14.51	22.73	22.94	36.36	52.48	31.82	2.82	4.55	3.28	3.59	1.95	

Borrower Distribution: HOME PURCHASE		Geography: MT VERNON 2000					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:																
Non MSA – 2000 Census	204	95.77	16.48	14.00	19.63	24.00	25.63	22.50	38.26	39.50	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Mansfield MSA – 2000 Census	9	4.23	10.84	44.44	14.72	0.00	22.28	44.44	52.16	11.11	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.5% 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.

[@] As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by BANK.

^{@@} Percentage of Families is based on the 2000 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 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MT VERNON 1990					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Improvement 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:																
Non MSA – 1990 census	100	87.72	17.87	23.23	20.41	24.24	24.74	34.34	36.97	18.18	18.97	26.67	20.90	20.17	11.25	
Limited Review:																
Mansfield MSA – 1990 census	14	12.28	10.07	7.14	14.51	14.29	22.94	57.14	52.48	21.43	11.22	8.33	13.33	17.14	5.56	

Borrower Distribution: HOME IMPROVEMENT		Geography: MT VERNON 2000					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share				
MA/Assessment Area:	Total Home Improvement 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:																
Non MSA – 2000 Census	70	88.61	16.48	20.00	19.63	22.86	25.63	28.57	38.26	28.57	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Mansfield MSA – 2000 Census	9	11.39	10.84	22.22	14.72	33.33	22.28	22.22	52.16	22.22	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

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

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

[@] As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

^{@@} Percentage of Families is based on the 1990 Census information.

^{@@@} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MT VERNON 1990					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:																
Non MSA – 1990 census	1,219	90.16	17.87	7.77	20.41	20.80	24.74	31.08	36.97	40.35	12.55	17.20	11.84	11.17	13.45	
Limited Review:																
Mansfield MSA-1990 census	133	9.84	10.07	6.02	14.51	24.81	22.94	32.33	52.48	36.84	5.90	9.09	10.13	6.35	4.02	

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MT VERNON 2000					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:																
Non MSA – 2000 Census	826	91.68	16.48	10.89	19.63	23.39	25.63	31.06	38.26	34.65	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Mansfield MSA – 2000 Census	75	8.32	10.84	6.67	14.72	34.67	22.28	28.00	52.16	30.67	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by BANK.

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

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

[@] As a percentage of loans with borrower income information available. No information was available for 2.0% of loans originated and purchased by BANK.

^{@@} Percentage of Families is based on the 2000 Census information.

^{@@@} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MT VERNON 1990			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
MA/Assessment Area:	#	% 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:									
Non MSA – 1990 census	1,330	93.99	78.97	87.22	82.56	11.58	5.86	13.36	26.94
Limited Review:									
Mansfield MSA – 1990 census	85	6.01	81.04	63.53	83.53	9.41	7.06	2.28	4.06

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MT VERNON 2000			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
MA/Assessment Area:	#	% 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:									
Non MSA – 2000 Census	755	95.21	68.51	74.97	78.01	14.30	7.68	0.00	0.00
Limited Review:									
Mansfield MSA – 2000 Census	38	4.79	68.97	60.53	84.21	10.53	5.26	0.00	0.00

^{*} 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 0.00% of small loans to businesses originated and purchased by the bank.

[@] 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 6.31% of small loans to businesses originated and purchased by the bank.

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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MT VERNON 1990			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:									
Non MSA – 1990 census	340	97.70	97.38	99.71	94.12	5.88	0.00	37.27	39.51
Limited Review:									
Mansfield MSA – 1990 census	8	2.30	93.94	100.00	87.50	12.50	0.00	13.33	16.67

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MT VERNON 2000			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:									
Non MSA – 2000 Census	167	97.09	96.87	97.60	89.22	10.18	0.60	0.00	0.00
Limited Review:									
Mansfield MSA – 2000 Census	5	2.91	93.39	100.00	80.00	20.00	0.00	0.00	0.00

^{*} 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 0.00% of small loans to farms originated and purchased by the bank.

[@] 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 1.74% of small loans to farms originated and purchased by the bank.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: MT VERNON AAs				Evaluation Period: February 21, 2001 TO November 15, 2004			
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:									
Non MSA	0	0	37	34	37	34	97.00	0	0
Statewide/Regional investments with potential to benefit the AA	9	336	4	1,190	13	1,526	100.00	11	3,804
Limited Review:									
Mansfield MSA	0	0	2	1	2	1	3.00	0	0

^{*} 'Prior Period Investments' means investments made in a previous 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 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MT VERNON 1990																	
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002																	
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:																	
Non MSA – 1990	95	12	92	0.00	8	84	8	1	0	0	0	1	0	0.00	5.49	85.10	9.40
Limited Review:																	
Mansfield MSA – 1990 census	5	1	8	0.00	0.00	100	0.00	0	0	0	0	0	0	0.00	0.00	28.05	71.95

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MT VERNON 2003																	
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:																	
Non MSA – 2000 Census	95	13	100	0.00	0.00	100	0.00	1	0	0	0	1	0	0.00	0.00	98.51	1.49
Limited Review:																	
Mansfield MSA – 2000 Census	5	1	100	0.00	0.00	100	0.00	0	0	0	0	0	0	0.00	0.00	28.56	71.44