

LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

Lebanon Citizens National Bank
Charter Number: 2360

2 North Broadway
Lebanon, Ohio 45036

Office of Comptroller of the Currency

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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

Lebanon Citizens National Bank (LCNB) is an independent, intrastate community bank, headquartered in Lebanon, Ohio, which is located in Warren County, approximately 30 miles north of Cincinnati, Ohio. LCNB is a wholly owned subsidiary of LCNB Corp., a one-bank financial services holding company, also headquartered in Lebanon, Ohio. LCNB has 18 branches and 25 ATMs serving Warren, Butler, and Clinton Counties and portions of Clermont and Hamilton Counties. Since the previous examination, LCNB has converted one loan production office in Hamilton, Ohio, into a branch office.

The bank has designated three assessment areas (AAs). One AA includes a portion of the Cincinnati MSA, a second includes all of the Hamilton-Middletown MSA, and the third includes Clinton County, a non-MSA. The AAs meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income areas.

As of June 30, 2004, LCNB reported total assets of \$498 million and Tier 1 capital of \$42.7 million (8.6% of total assets). LCNB is a full-service lender offering various loan and deposit products. The bank offers conventional home mortgage loans, consumer loans, and a full range of business loans and trust services. LCNB's primary focus is real estate and consumer lending and to a lesser extent, small business and small farm lending. For additional information on the products and services offered by LCNB, please refer to the bank's CRA Public File. Competition for loans and deposits within the bank's marketing area is strong and comes from several local community banks and branches of regional institutions. No legal or economic impediments exist that restrict the bank's ability to serve the community's credit needs. The bank was last reviewed for its CRA performance in June 2000 and was rated "Outstanding."

Evaluation Period

We evaluated LCNB's lending performance using data for the period January 1, 2000, through December 31, 2003. For community development (CD) loans, investments, and services, our evaluation period extends from the ending date of the last CRA examination of June 12, 2000, through October 4, 2004. For each AA, we conducted two separate analyses. The 1990 census data was used for comparison to the years 2000 – 2002, and the 2000 census data was used to analyze 2003 loan data.

Scope of the Evaluation

As part of this CRA evaluation, we tested for accuracy, LCNB's publicly filed information of home mortgage loans, small loans to businesses, and small loans to farms. Our testing found material errors in the small business and small farm lending data. However, all data used in this evaluation is accurate. We did not evaluate the bank's performance for home improvement loans, multifamily housing loans, and small loans to farms. Given the limited volume of these types of loans, an analysis of this data is not meaningful.

We reviewed 100 percent of the bank's community development loans, investments, and services. Only those activities that qualified are presented and considered in this evaluation.

For analysis purposes, the Cincinnati AA represents the bank's primary lending area. This MSA also contains the bank's headquarters office and the majority of branches. We conducted full scope reviews of the Cincinnati and the Hamilton-Middletown AAs and a limited scope review of the Clinton County AA. The bank's rating is primarily based on the full-scope AAs. A brief summary of key demographic data for the full scope AAs is provided in appendix A.

We placed more weight on the bank's performance for the years 2000 – 2002, using the 1990 census information as the comparator. Additionally, more weight was placed on borrower distribution over geographic distribution given the limited number of low- and moderate-income tracts in the AAs. This data is presented in the tables found in appendix C.

Overall CRA Rating

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

The following table indicates the performance level of **Lebanon Citizens National Bank**:

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

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

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

LENDING

Refer to Tables 1 through 13 in Appendix B for facts and data used to evaluate the bank’s lending activity.

Performance under the lending test is rated Outstanding. Performance in the Cincinnati AA is good and in the Hamilton-Middletown AA is excellent.

Cincinnati AA

LCNB’s lending activity is good in the Cincinnati AA. This AA is the source of the largest volume of the bank’s activity and the location of the largest number of branches. The Cincinnati AA has 84 percent of deposits, 71 percent of loans, and 72 percent of branches. The bank’s deposit market share is approximately 9 percent, ranking third in the market behind a large nationwide institution with 62 percent of the market and a large regional bank with 9 percent. The deposit market share exceeds its home mortgage and small business lending market share. There are no low-income tracts in the Cincinnati AA.

The distribution of home mortgage loans in moderate-income areas is good. For the years 2000-2002, the distribution of home purchase and home refinance loans was excellent and exceeded the percentage of owner-occupied units in those areas. For the year 2003, the distribution was weaker and considered poor

because the percentage of loans in the moderate-income areas was substantially lower than the percentage of owner-occupied units in those areas.

The distribution of small loans to businesses in moderate-income areas was good. For the years 2000-2002, the percentage of loans made in moderate-income areas was excellent and exceeded the percentage of businesses located in those areas. For the year 2003, performance was weaker and considered poor because the percentage of loans to businesses in the moderate-income areas is substantially lower than the percentage of businesses in those areas.

For the years 2000-2002, the distribution of home mortgage loans to low- and moderate-income individuals is excellent. For both home purchase and home refinance loans, the percentage of loans to low-income individuals is considered excellent given a household poverty rate of 12 percent in the AA. The percentage of loans to moderate-income borrowers is near to the percentage of families for home purchase, and exceeds the percentage of families for home refinance loans. For the year 2003, home mortgage lending performance was similar to the performance in the years 2000-2002.

The distribution of loans to businesses of different sizes is adequate. For the entire evaluation period (2000-2003), the percentage of loans to small businesses (i.e. those with gross annual revenues of \$1 million or less) is lower than the demographic comparator.

Hamilton-Middletown AA

Lending activity in the Hamilton-Middletown AA is excellent. This AA has 13 percent of deposits, 23 percent of loans, and 22 percent of branches. The bank's deposit market share is 0.21 percent, ranking twentieth in an area dominated by four large regional banks. The bank's HMDA and small business lending market share exceeds its deposit market share.

The distribution of home mortgage loans in both low- and moderate-income areas is good. For the years 2000-2002, the distribution of home purchase and home refinance loans is excellent in the low-income areas and exceeds the percentage of owner-occupied units in those areas. In the moderate-income areas, the distribution of home purchase loans is adequate and is lower than the percentage of owner-occupied units in those areas. The distribution of home refinance loans in moderate-income areas is excellent and substantially exceeds the percentage of owner-occupied units in those areas. For the year 2003, the distribution of home purchase loans is excellent in moderate-income areas, and poor in low-income areas. The distribution of home refinance loans is poor in both the low- and moderate-income areas.

The distribution of small loans to businesses is excellent. For the years 2000-2002, the percentage of loans made in low- and moderate-income areas is excellent and exceeds the percentage of businesses located in those areas. For

the year 2003, performance is good and near to the percentage of businesses in those areas.

For the years 2000-2002, the distribution of home mortgage loans to low- and moderate-income individuals is excellent. The distribution of home purchase and home refinance loans to low- income individuals is excellent given a household poverty rate of 13 percent in the AA. The distribution of home purchase loans to moderate-income individuals is good and is near to the percentage of families of this income level. The distribution of home refinance loans to moderate-income borrowers is excellent and exceeds the percentage of families of this income level. For the year 2003, home mortgage lending performance is excellent and stronger than the performance in the years 2000-2003 for both home purchase and home refinance loans to low- and moderate-income individuals.

The distribution of loans to businesses of different sizes is adequate. For the years 2000-2002, the percentage of loans to small businesses (i.e. those with gross annual revenues of \$1 million or less) is below the demographic comparator. For the year 2003, performance is stronger and slightly higher than the demographic comparator.

Flexible Underwriting

LCNB extends consumer and commercial loans with no minimum loan amount. This flexible underwriting process is tailored to meet the needs of low- or moderate-income individuals and is not offered by other commercial banks in the area. A review of loans of \$2 thousand or less made during the evaluation period indicated that these loans appeal to a higher portion of low- and moderate-income borrowers than is represented by that percentage of population in both the full scope AAs.

Lending Gap Analysis

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

Inside/Outside Ratio

Eighty-three percent of loans originated or purchased by LCNB over the evaluation period were within its AAs, which is a substantial majority of loans. By product type, 85% of home mortgage loans and 76% of small loans to businesses were made inside its AAs during the evaluation period.

Community Development Lending

LCNB's community development lending activity had a neutral impact on the Lending Test rating. The bank originated two community development loans in the Cincinnati AA totaling \$171 thousand. These loans assisted a nonprofit affordable housing agency, an identified community need.

Limited-Scope Conclusions

Based on a limited-scope review, the bank's performance under the lending test in the Clinton County AA is weaker than performance in the full-scope AAs. This performance did not impact the overall lending test rating.

INVESTMENTS

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

Performance under the investment test is rated "High Satisfactory." In the Cincinnati AA, performance is excellent and in the Hamilton-Middletown AA, performance is adequate.

In evaluating the bank's volume of investments, we considered community development opportunities in the AA, as well as the capacity for the local infrastructure to create qualified investments. The bank's AAs contain a limited number of low- and moderate-income areas. Because of this, the bank contracted with a specialist to tailor qualified investments and as a result, the level of investments has increased substantially since the last CRA examination. LCNB hired an investment bank to assemble two groups of mortgage loans to low- and moderate-income borrowers in the Cincinnati AA. The bank invested in these mortgages at rates below those of competitive institutions. LCNB also made charitable contributions to 45 qualified organizations that provide services to low- and moderate-income families or individuals. Organizations benefiting from these contributions covered each of the bank's AAs.

SERVICES

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.

Performance under the service test is rated "High Satisfactory." Performance in both the Cincinnati AA and the Hamilton-Middletown AA is good and in the Clinton County AA performance is adequate.

In the Cincinnati AA, LCNB's offices and retail services are reasonably accessible to geographies and individuals of all income levels. Although none of the bank's offices are located in moderate-income areas, 38 percent of its offices are located in tracts adjacent to moderate-income tracts. However, only 5.76 percent of the population lives in the moderate-income census tracts per the 1990 census. There are no low-income tracts in this AA. The bank did not close any offices in this AA during the evaluation period.

In the Hamilton-Middletown AA, LCNB's offices and retail services are reasonably accessible to geographies and individuals of all income levels. Fifty percent of its offices are located in moderate-income areas which substantially exceeds the percentage of the moderate-income population that resides in these areas. There are no branches in low-income areas; however, two branches are located in tracts adjacent to the low-income tracts. The bank opened one office in a middle-income geography during this evaluation period.

LCNB's hours and services offered throughout the Cincinnati AA and the Hamilton-Middletown AA are good. The availability of services is comparable among locations regardless of the income level of the geography.

Alternative delivery systems include automated teller machines, 24-hour telephone banking, and Internet banking services. These services are available to all segments of the bank's AAs. The bank has not performed an analysis of the benefits of these services. Therefore, we did not place significant weight on the alternative delivery systems.

LCNB's community development services are considered good. These services include participation with various entities in Warren and Butler counties. Several officers provide professional assistance to groups involved in affordable housing, small business development, and services to low- and moderate-income individuals.

Fair Lending or Other Illegal Credit Practices Review

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

Appendix A: Market Profiles for Full-Scope Areas

Demographic Information for Full Scope Area: Cincinnati AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	27	0.00	7.41	66.67	22.22	3.70
Population by Geography	99,695	0.00	5.76	64.48	26.83	2.92
Owner-Occupied Housing by Geography	24,960	0.00	4.23	67.22	28.55	0.00
Business by Geography	6,074	0.00	6.24	61.87	31.84	0.05
Farms by Geography	331	0.00	2.42	82.18	15.41	0.00
Family Distribution by Income Level	27,411	14.84	17.27	25.01	42.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	8,800	0.00	9.60	75.25	15.15	0.00
Median Family Income		36,658	Median Housing Value			74,347
HUD Adjusted Median Family Income for 2002		64,300	Unemployment Rate (1990 US Census)			2.65%
Households Below Poverty Level		12.43%				

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

Source: 1990 US Census and 2002 HUD updated MFI

Demographic Information for Full Scope Area: Hamilton-Middletown AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	73	10.96	23.29	43.84	20.55	1.37
Population by Geography	291,479	7.65	19.99	45.26	26.40	0.69
Owner-Occupied Housing by Geography	72,365	3.53	18.21	49.46	28.79	0.01
Business by Geography	14,714	7.61	14.79	48.56	29.02	0.03
Farms by Geography	505	1.98	6.53	69.11	22.38	0.00
Family Distribution by Income Level	78,113	19.23	18.20	24.52	38.06	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	29,231	12.41	32.61	42.30	12.68	0.00
Median Family Income		38,674	Median Housing Value			74,116
HUD Adjusted Median Family Income for 2002		62,600	Unemployment Rate (1990 US Census)			2.64%
Households Below Poverty Level		10.66%				

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

Source: 1990 US Census and 2002 HUD updated MFI

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 assessment area (AA). 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 AA. Community development loans to statewide or regional entities or made outside the bank's AA 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.
- 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 multifamily 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 AA.
- 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 AA.
- 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 AA. 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. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each AA.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each 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 AA. The table also presents data on branch openings and closings in each AA

NOTE: TABLES 3, 5, 7, 9, 12, and 13 ARE NOT APPLICABLE AND ARE NOT INCLUDED IN THIS SECTION.

Table 1. Lending Volume

LENDING VOLUME													Geography: OHIO		Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002	
Assessment Area:	% of Rated Area Loans (#) in AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in AA ^{***}				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full Scope:																
Cincinnati AA	70.10	614	76,115	157	18,397	43	4,589	2	171	816	99,272	83.80				
Hamilton-Middletown AA	24.32	233	27,169	42	8,763	8	552	0	0	283	36,484	13.40				
Limited Scope:																
Clinton County AA	5.58	49	5,184	11	737	5	265	0	0	65	6,186	2.80				

LENDING VOLUME													Geography: OHIO		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003	
Assessment Area:	% of Rated Area Loans (#) in AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in AA ^{***}				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full Scope:																
Cincinnati AA	73.13	416	56,242	81	11,814	12	1,530	0	0	509	69,586	83.80				
Hamilton-Middletown AA	20.69	112	14,884	29	5,111	3	282	0	0	144	20,277	13.40				
Limited Scope:																
Clinton County AA	6.18	40	4,125	2	60	1	50	0	0	43	4,235	2.80				

^{*} Loan Data as of December 31, 2002 and December 31, 2003, respectively. Rated area refers to the state rating area.

^{**} The evaluation period for Community Development Loans is from June 12, 2000 to October 4, 2004.

^{***} Deposit Data as of June 30, 2004. Rated area refers to the state rating area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OHIO				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Scope:															
Cincinnati AA	173	63.37	NA	NA	4.23	7.51	67.22	79.77	28.55	12.72	1.11	NA	1.15	1.73	0.25
Hamilton-Middletown AA	85	31.14	3.54	4.71	18.21	11.76	49.47	57.65	28.79	25.88	0.22	0.38	0.08	0.32	0.11
Limited Scope:															
Clinton County AA	15	5.49	NA	NA	NA	NA	100.00	100.00	NA	NA	0.67	NA	NA	0.67	NA

Geographic Distribution: HOME PURCHASE		Geography: OHIO				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Scope:															
Cincinnati AA	72	75.00	NA	NA	10.35	2.78	34.52	66.67	55.13	30.56	0.72	NA	0.26	1.81	0.34
Hamilton-Middletown AA	18	18.75	2.37	0.00	17.48	33.33	53.57	50.00	26.58	16.67	0.18	0.00	0.28	0.20	0.09
Limited Scope:															
Clinton County AA	6	6.25	NA	NA	NA	NA	86.88	100.00	13.12	0.00	1.11	NA	NA	1.24	0.00

* Based on 2002 and 2003 Peer Mortgage Data, respectively – Eastern Region.

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

*** 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 the 1990 and 2000 Census information, respectively.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Scope:																
Cincinnati AA	441	70.79	NA	NA	4.23	6.58	67.22	83.90	28.55	9.52	2.08	NA	3.51	3.04	0.61	
Hamilton-Middletown AA	148	23.76	3.54	6.08	18.21	22.30	49.47	46.62	28.79	25.00	0.40	0.90	0.82	0.41	0.27	
Limited Scope:																
Clinton County AA	34	5.46	NA	NA	NA	NA	100.00	100.00	NA	NA	0.93	NA	NA	0.93	NA	

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: OHIO					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Scope:																
Cincinnati AA	344	72.88	NA	NA	10.35	1.16	34.52	60.47	55.13	38.37	1.07	NA	0.22	2.22	0.63	
Hamilton-Middletown AA	94	19.92	2.37	0.00	17.48	8.51	53.57	71.28	26.58	20.21	0.27	0.00	0.23	0.35	0.18	
Limited Scope:																
Clinton County AA	34	7.20	NA	NA	NA	NA	86.88	82.35	13.12	17.65	1.07	NA	NA	1.07	1.06	

* Based on 2002 and 2003 Peer Mortgage Data, respectively – Eastern Region.

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

*** 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 and 2000 Census information, respectively.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
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 Scope:																
Cincinnati AA	157	74.76	NA	NA	6.24	13.38	61.87	80.25	31.84	6.37	0.39	NA	0.25	0.71	0.14	
Hamilton-Middletown AA	42	20.00	7.61	9.52	14.79	16.67	48.56	50.00	29.02	23.81	0.32	1.25	0.41	0.36	0.10	
Limited Scope:																
Clinton County AA	11	5.24	NA	NA	NA	NA	100.00	100.00	NA	NA	0.08	NA	NA	0.08	NA	

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography*				
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 Scope:																
Cincinnati AA	81	73.64	NA	NA	12.16	2.47	35.14	58.02	52.69	39.51	0.30	NA	0.05	0.41	0.40	
Hamilton-Middletown AA	29	26.36	8.03	7.41	22.28	18.52	48.39	59.26	21.30	14.81	0.43	0.59	0.35	0.52	0.24	
Limited Scope:																
Clinton County AA	2	1.82	NA	NA	NA	NA	88.63	100.00	11.37	0.00	0.20	NA	NA	0.25	0.00	

* Based on 2002 and 2003 Peer Small Business Data, respectively.

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

*** Source Data - Dun and Bradstreet (2002 and 2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: OHIO				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002						Market Share [*]				
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 Scope:																
Cincinnati AA	173	63.37	14.84	8.98	17.27	16.17	25.01	22.16	42.88	52.69	1.24	2.14	0.82	1.07	1.39	
Hamilton-Middletown AA	85	31.14	19.23	14.29	18.20	16.67	24.52	28.57	38.06	40.48	0.26	0.46	0.11	0.22	0.36	
Limited Scope:																
Clinton County AA	15	5.49	17.47	0.00	17.08	6.67	25.62	26.67	39.84	66.67	0.80	0.00	0.68	0.56	1.17	

Borrower Distribution: HOME PURCHASE		Geography: OHIO				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						Market Share [*]				
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 Scope:																
Cincinnati AA	72	75.00	11.32	8.45	15.37	25.35	21.75	28.17	51.56	39.03	0.81	1.17	0.87	0.94	0.65	
Hamilton-Middletown AA	18	18.75	17.41	27.78	19.83	11.11	24.18	16.67	38.57	44.44	0.21	0.30	0.14	0.19	0.24	
Limited Scope:																
Clinton County AA	6	6.25	15.48	0.00	17.19	40.00	24.15	20.00	43.18	40.00	1.11	2.00	1.21	0.78	1.01	

^{*} Based on 2002 and 2003 Peer Mortgage Data, respectively – Eastern Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 2.6% of loans originated and purchased by bank for the years 2000-2002, and 2.1% for the year 2003.

^{***} Percentage of Families is based on the 1990 and 2000 Census information, respectively.

^{****} Home purchase loans originated and purchased in the AA as a percentage of all home purchase loans originated and purchased in the rated areas.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: OHIO		Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]							
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loan ^{****}	% Families ^{***}	% BANK Loan ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp			
Full Scope:																		
Cincinnati AA	441	70.79	14.84	11.89	17.27	22.84	25.01	30.30	42.88	34.97	2.32	4.55	3.82	3.15	1.21			
Hamilton-Middletown AA	148	23.76	19.23	8.97	18.20	20.69	24.52	31.03	38.06	39.31	0.45	0.61	0.53	0.44	0.38			
Limited Scope:																		
Clinton County AA	34	5.46	17.47	0.00	17.08	17.65	25.62	32.35	39.84	50.00	1.08	0.00	0.72	1.12	1.31			

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: OHIO		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]							
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp			
Full Scope:																		
Cincinnati AA	344	72.94	11.32	11.18	15.37	26.47	21.75	28.82	51.56	33.53	1.22	2.55	1.86	1.34	0.78			
Hamilton-Middletown AA	94	19.87	17.41	19.15	19.83	20.21	24.18	25.53	38.57	35.11	0.31	0.56	0.26	0.27	0.29			
Limited Scope:																		
Clinton County AA	34	7.19	15.48	3.03	17.19	27.27	24.15	18.18	43.18	51.52	1.17	0.84	1.55	0.83	1.30			

^{*} Based on 2002 and 2003 Peer Mortgage Data, respectively – Eastern Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by bank for years 2000-2002, and 1.3% for year 2003.

^{***} Percentage of Families is based on the 1990 and 2000 Census information, respectively

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: OHIO					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
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 Scope:									
Cincinnati AA	157	74.76	76.61	54.78	64.33	22.29	13.38	0.39	1.09
Hamilton-Middletown AA	42	20.00	77.82	54.76	45.24	33.33	21.43	0.32	0.85
Limited Scope:									
Clinton County AA	11	5.24	80.41	54.55	90.91	0.00	9.09	0.08	0.31

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: OHIO					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
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 Scope:									
Cincinnati AA	81	72.32	64.21	51.85	61.73	22.22	16.05	0.30	0.47
Hamilton-Middletown AA	29	25.89	63.97	65.52	48.28	27.59	24.14	0.43	0.81
Limited Scope:									
Clinton County AA	2	1.79	65.55	50.00	100.00	0.00	0.00	0.20	0.23

* Based on 2002 and 2003 Peer Small Business Data, respectively.

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B – 2002 and 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 13.81% of small loans to businesses originated and purchased by the bank in the years 2000-2002, and 6.25% in the year 2003.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: OHIO		Evaluation Period: JUNE 12, 2000 TO OCTOBER 4, 2004				
Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope:									
Cincinnati AA	0	0	26	3,060	26	3,060	99.54	0	0
Hamilton-Middletown AA	0	0	15	11	15	11	0.36	0	0
Limited Scope:									
Clinton County AA	0	0	6	3	6	3	0.10	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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: OHIO				Evaluation Period: JUNE 12, 2000 TO OCTOBER 4, 2004										
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 (per 2000 Census)				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Scope:																		
Cincinnati AA	83.80	13	72.00	0.00	0.00	84.62	15.38	0	0	0	0	0	0	0	NA	11.33	36.01	52.61
Hamilton-Middletown AA	13.40	4	22.00	0.00	50.00	50.00	0.00	1	0	0	0	1	0	0	5.86	21.61	48.29	23.98
Limited Scope:																		
Clinton County AA	2.80	1	6.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0	NA	NA	88.14	11.86