



Comptroller of the Currency
Administrator of National Banks

PUBLIC DISCLOSURE

October 23, 1997

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Community Bank, N.A.

Charter Number 18342

300 West Market Street
Lima, Ohio 45801

Comptroller of the Currency
Central District Office
One Financial Place, Suite 2700
440 South LaSalle Street
Chicago, Illinois 60605

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

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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of American Community Bank, N.A. (AmeriCom) prepared by The Office of the Comptroller of the Currency, the institution's supervisory agency, as of October 23, 1997. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Institution's CRA Rating: This institution is rated "**Satisfactory record of meeting community credit needs.**" The prior Performance Evaluation dated December 31, 1994 also resulted in an assigned rating of "Satisfactory record of meeting community credit needs."

Summary of Performance: AmeriCom has a good record of addressing community credit needs as summarized below:

- Mortgage and small business lending activity has been good. Within its largest assessment area, AmeriCom has been the leading home mortgage lender and the leader in lending to the low- and moderate-income segments of that community. Over 86% of small business loans made within the assessment areas have been made to businesses with annual revenues less than \$1 million. This is favorable in comparison to the demographic composition of the business market.
- Community development lending performance has been strong. A relatively high level of loans were made which addressed each of the identified primary community development credit needs.
- Flexible lending practices are employed. Creative financing packages and special programs have been used to provide loans where traditional financing could not be offered.
- Banking offices and ATMs are reasonably accessible to all portions of the assessment areas, with a relatively high proportion located within low- and moderate-income areas. New facilities and expanded hours have improved AmeriCom's accessibility to low- and moderate-income individuals in portions of the bank's community.

The following table indicates the performance level of **American Community Bank, N.A.** with respect to the Lending, Investment, and Service tests.

Performance Levels	American Community Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High satisfactory	X		X
Low satisfactory		X	
Needs to improve			
Substantial noncompliance			

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

Description of Institution

American Community Bank, N.A. (AmeriCom) is a full service commercial bank headquartered in Lima, Ohio. With average assets of \$378 million during the first quarter of 1997, AmeriCom serves all or portions of four counties in west central Ohio through 13 offices and 13 deposit-taking Automatic Teller Machines (ATMs). AmeriCom was created through merger and acquisition activities during 1992 and 1993. The bank was formed in October 1992 when Citizens Loan and Building Company located in Lima merged with The Farmers Banking Company based in Bellefontaine. Home Savings of America branches in Marysville and Marion were purchased in November 1992 and April 1993 respectively. Branch purchases included deposits, but involved no loans. Finally, Colonial Savings and Loan headquartered in Bellefontaine was merged into AmeriCom in July 1993.

AmeriCom is a wholly-owned subsidiary of Mid Am, Inc., a \$2.2 billion multi-bank holding company based in Bowling Green, Ohio. Formed in 1988, Mid Am, Inc. currently operates five banks and six non-bank financial service affiliates. Four of these banks operate in western Ohio and one operates in southeast Michigan. Non-bank affiliates include an investment / brokerage company, a national consumer finance company, a private trust bank, a specialized credit and leasing company, an information services corporation, and a collections company.

AmeriCom provides a full range of retail and commercial banking products. A wide variety of residential mortgage, commercial, and consumer loans are offered. Trust, investment and brokerage services are provided through Mid Am, Inc. affiliates. While striving to be a full service financial institution, AmeriCom has focused particular attention toward addressing the

home mortgage and small business credit needs of the community. The bank's loan portfolio as of March 31, 1997 is summarized in Table 1.

Table 1 AmeriCom Loan Portfolio March 31, 1997 (\$000's)		
Commercial, Industrial, & Business Loans	\$136,909	49%
Residential Mortgages & Home Equity	86,443	31%
Consumer Loans	38,137	14%
Commercial Real Estate Loans	11,052	4%
Farm and Agriculture Loans	3,325	1%
Other Loans	3,814	1%
Total Loans Outstanding 3/31/97	\$279,680	100%

Source: AmeriCom 3/31/97 Report of Condition

During 1995 and 1996, AmeriCom continued its transition from a traditional thrift institution to a commercial bank with a new name and identity in the market. AmeriCom focused its attention on increasing its loan portfolio while reducing a relatively large investment portfolio. This was accomplished in part by purchasing loans from affiliates, and through extending indirect mobile home mortgage loans through dealers operating across the country. Subsequent to the merger and acquisition activities, management determined it was necessary to realign its banking center structure as part of the transition process.

The bank is in sound financial condition, although earnings performance has been modest. Return on average assets was .56% in 1995 and .50% in 1996. This is less than half the 1.27% experienced on average by banks of similar size and characteristics from throughout the country in both 1995 and 1996. In part, 1996 profits were negatively impacted by a one-time industry-wide assessment to recapitalize the federal deposit insurance fund. With its deposits stemming from former thrift institutions, the bank was required to pay a sizable assessment. At March 31, 1997 AmeriCom's assets were comprised of: Loans (74%), Cash and Investments (22%), and Other Assets (4%). Liabilities are comprised of: Domestic Deposits (95%), and Borrowed Funds (5%). Equity Capital represents 8% of assets. No legal impediments which would impact the bank's ability to address the credit needs of the community have been identified.

Description of Assessment Areas

AmeriCom operates in four west central Ohio counties, and has established two CRA assessment areas to serve this geographic territory. Both assessment areas are consistent with CRA regulatory requirements. Table 2 provides a breakdown of how the bank’s deposits and loans are distributed between the assessment areas, as well as the distribution of various demographic variables. For instance, the Northwest Assessment Area contains 21% of AmeriCom’s assessment area deposit dollars, 67% of the low-and moderate-income census tracts, and 43% of the low- and moderate-income families residing in the assessment areas. The table also reflects the distribution of owner-occupied (own-occ.) housing units, population, and businesses within the areas. Our evaluation placed somewhat more weight on AmeriCom’s performance in the Southeast Assessment Area as that area represents a greater share of the bank and the market, including the number of low- and moderate-income families.

Assessment Area	Deposit Dollars %	Loan Dollars %	Low/Mod Tracts %	Low/Mod Families %	Population %	Own-Occ. Housing %	Businesses %
Northwest	21%	28%	67%	43%	39%	38%	43%
Southeast	79%	72%	33%	57%	61%	62%	57%
Total	100%	100%	100%	100%	100%	100%	100%

Sources: Deposit and loan data according to AmeriCom reports; U.S. Census data; Dun & Bradstreet, Inc. business data

AmeriCom’s **Northwest Assessment Area** is within the Lima Metropolitan Statistical Area (MSA 4320) and is comprised of a substantial portion of Allen County. Auglaize County and portions of Allen County are not included in the bank’s assessment area, as AmeriCom does not have offices in those parts of the MSA. Management determined that the entire MSA would be too large for AmeriCom to reasonably serve for CRA purposes. The area is comprised of 30 census tracts, including 4 low-income tracts and 8 moderate-income tracts primarily concentrated in downtown Lima. (*Note: the terms **census tract** and **tract** as used throughout this document refers also to **block numbering areas**.*) AmeriCom serves the Northwest Assessment Area with four offices and four ATMs. Table 3 provides some demographic data relative to the area.

Table 3 <i>AmeriCom's Northwest Assessment Area Demographic Data</i>						
TOTAL POPULATION (1990 census data)		89,925				
AREA INCOME Lima MSA 1990 HUD Median Family Income Lima MSA 1997 HUD Adjusted Median Family Income		\$33,291 \$42,300				
UNEMPLOYMENT RATES (Average of Monthly Seasonally Unadjusted Rates)		1995 Average	1996 Average	1997 Average Through May		
Allen County		5.7	6.4	6.2		
State of Ohio		4.8	4.9	5.2		
CENSUS TRACT CHARACTERISTICS (Based on HUD Median Family Income)		Tracts		Families		Businesses
		Count	%	Count	%	Count %
Low (below 50% of median)		4	13	1,591	7	520 17
Moderate (50 - 80% of median)		8	27	4,124	17	490 16
Middle (80-120% of median)		13	43	12,810	54	1,396 47
Upper (over 120% of median)		5	17	5,170	22	584 20
Total		30	100	23,695	100	2,990 100
HOUSING INFORMATION (1990 census data)		Total Units		Units in Low- Income Areas		Units in Mod- Income Areas
		Count	%	Count	%	Count %
Owner Occupied Units		22,640	63	1,066	5	3,444 15
Rental Occupied Units		9,928	28	1,615	16	2,483 25
Vacant Housing Units		3,070	9	790	26	961 31
Total		35,638	100	3,471	10	6,888 19

Sources: U.S. Census data; Dun & Bradstreet, Inc. business data; Unemployment data according to Ohio Bureau of Employment Services

The Northwest Assessment Area is primarily urban in nature, with the city of Lima being the focal point. According to Dun & Bradstreet, Inc. data as of June 1996, there are 2,990 businesses, including 63 agriculture related-entities, located within the area. Prominent industries include manufacturing, service, and retail trade. Allen county is transitioning from a manufacturing base to a service / retail based employer. Major employers include Ford Motor Company, St. Rita's Medical Center, and MetoKote. The Allen County economy has been generally stable during the past two years, although unemployment levels have remained above state averages. Refer to Table 3.

The Allen County financial market is highly competitive. AmeriCom competes with a large number of other financial and non-financial institutions. Some of the primary financial institutions operating in Allen County are Bank One, N.A.; Huntington National Bank; Citizens National Bank of Bluffton; Commercial Bank; and Fifth Third Bank of Western Ohio. In relation to the other financial institutions in the area, AmeriCom is a mid-size bank with a modest presence.

The *Southeast Assessment Area* is comprised of Logan, Marion, and Union counties. This contiguous area is not within an MSA. A total of 36 census tracts are included, none of which are designated as being low-income, and six designated as moderate-income. The area is primarily rural in nature, with the cities of Bellefontaine (Logan County), Marion (Marion County), and Marysville (Union County) being the population centers. AmeriCom serves the Southeast Assessment Area with nine offices, nine deposit-taking ATMs, and one ATM that is cash-dispensing only. Table 4 provides some demographic data relative to the area.

Table 4 <i>AmeriCom's Southeast Assessment Area Demographic Data</i>						
TOTAL POPULATION (1990 census data)		138,553				
AREA INCOME 3-county Weighted Average 1990 Median Family Income Ohio 1997 Nonmetropolitan HUD Median Family Income		\$30,563 \$38,800				
UNEMPLOYMENT RATES (Average of Monthly Seasonally Unadjusted Rates)		1995 Average	1996 Average	1997 Average Through May		
Logan County		4.1	4.4	4.3		
Marion County		5.9	6.2	6.0		
Union County		3.8	4.2	4.2		
State of Ohio		4.8	4.9	5.2		
CENSUS TRACT CHARACTERISTICS (Based on HUD Median Family Income)		Tracts		Families		Businesses
		Count	%	Count	%	Count %
Low (below 50% of median)		0	0	0	0	0
Moderate (50 - 80% of median)		6	17	4,790	13	675 17
Middle (80-120% of median)		21	58	21,849	58	2,155 54
Upper (over 120% of median)		9	25	11,090	29	1,171 29
Total		36	100	37,729	100	4,001 100
HOUSING INFORMATION (1990 census data)		Total Units		Units in Low- Income Areas		Units in Mod- Income Areas
		Count	%	Count	%	Count %
Owner Occupied Units		36,548	65	0	0	4,304 12
Rental Occupied Units		13,925	25	0	0	2,833 20
Vacant Housing Units		5,748	10	0	0	1,900 33
Total		56,221	100	0	0	9,037 16

Sources: U.S. Census data; Dun & Bradstreet, Inc. business data; Unemployment data according to Ohio Bureau of Employment Services

Dominant industries within the Southeast Assessment Area are automotive-related manufacturing, services, and retail trade. Much of the area is used for farming. According to June 1996 Dun & Bradstreet, Inc. data, there are 4,401 businesses, including 174 agriculture-related entities, located within this area. Primary employers include Honda of America, Whirlpool Corporation, and

GTE, Inc. Logan and Union counties have experienced a stable business market and economic growth. Unemployment levels have been low. The Marion County economy has been stable, but unemployment rates have exceeded state averages. Refer to Table 4.

The Southeast Assessment Area's financial market is competitive. AmeriCom competes with several large and numerous small financial institutions. Some of the larger financial institutions operating within this community are Bank One, N.A., Huntington National Bank, National City Bank and the Fifth Third banks. Based on deposit balances reported by Bancpen using Sheshunoff Information Services, Inc., data, AmeriCom has a significant presence in Logan County. In Marion County, AmeriCom has a significant presence in regards to deposits that were purchased along with offices in 1993, but is relatively new to the market from a lending prospective. AmeriCom's presence in Union County is modest. With this assessment area's relative close proximity to the Columbus and Springfield markets, bank management has observed increasing levels of competition for retail loan business.

Our evaluation took into consideration information derived from members of the community. Three contacts were made, including a community development corporation association, a community council, and a non-profit organization. Furthermore, information from contacts made during the past two years by the OCC and the other federal financial regulating agencies was considered. The need for housing loans and small business financing were credit needs identified. Contacts cited affordable housing, economic development, and job training as primary community development needs.

Conclusions with Respect to Performance Tests

Lending Test

Lending Activity

AmeriCom is an active lender offering a wide variety of consumer, mortgage, and commercial lending products. Residential mortgages and business financing have been the primary focus. Table 1 reflects that these product lines represent 80% of the bank's loan portfolio. As AmeriCom sells most of its residential mortgages to the secondary market, the portfolio breakdown understates the degree in which mortgage lending dominates the bank's lending activity.

Table 5 details AmeriCom's lending activity for the loan products considered during this evaluation. Information is based on Home Mortgage Disclosure Act (HMDA) disclosure reports, CRA disclosure reports, and internal bank reports which were tested and found to be accurate. All 1997 data used within this document is preliminary.

Table 5						
<i>AmeriCom Lending Activity</i>						
Loan Type	1995		1996		YTD 3/97	
	Count	\$(000's)	Count	\$(000's)	Count	\$(000's)
Home Purchase	335	18,790	554	32,886	58	4,099
Home Refinance	258	15,871	556	38,773	76	5,956
Home Improvement	61	613	37	406	7	91
Multifamily	2	60	10	8,285	0	0
Small Business	N/A	N/A	240	17,608	51	4,661
Small Farm	N/A	N/A	43	1,514	12	410
Total Loans	656	35,334	1,440	99,472	204	15,217

Sources: HMDA data; CRA Disclosure Report data; AmeriCom reports

Note: N/A - small business and small farm data was not collected for 1995

Housing Related Lending

AmeriCom is an active home mortgage lender, with emphasis on Home Purchase and Home Refinance loans. Home improvement loans and multifamily housing financing are offered but are not a particular focus for AmeriCom bank. For HMDA purposes, the bank has elected to not track or report home equity lines of credit made for home improvement reasons. Therefore, home improvement activity may be understated.

Mortgage lending in the Southeast Assessment Area was strong, as AmeriCom was the market leader in Home Purchase and Home Refinance lending in 1996. AmeriCom's 474 loans were more than twice the number of loans made by the nearest competitor. And, relative to its size of the deposit market, AmeriCom made more loans than nearly all other lenders. AmeriCom was also the leading lender in the moderate-income neighborhoods and to the low-and moderate-income individuals within the Southeast Assessment Area in 1996.

Mortgage lending in the Northwest Assessment Area has been good. AmeriCom's 253 loans was the third highest made within the market. Relative to its size of the deposit market, AmeriCom made more loans than nearly all other lenders. Between 1995 and 1996 AmeriCom's lending levels in the Northwest Assessment Area increased by 101% whereas the aggregate market reflected an increase of 41%.

Small Business Lending

AmeriCom has been successful in transitioning from being primarily a mortgage lender to a bank that is also an active small business lender. AmeriCom's small business lending performance is considered to be good based on: 1) a good volume of lending activity has occurred; 2) a substantial majority of the number of small business loans were made for amounts under \$100,000; and 3) peer group analyses demonstrate that the level of small business loans outstanding is reasonable. Our conclusion also takes into consideration the transition status the bank has been in. For CRA purposes, *small business loans* are defined as commercial loans originated for \$1 million or less.

Table 5 reflects that AmeriCom made 291 small business loans between January 1, 1996 and March 31, 1997. This represents more than four loans per week on average (three per week within AmeriCom's assessment areas), and demonstrates that AmeriCom has been reasonably active in small business financing. Furthermore, 82% of the number of small business loans made within the assessment areas were for amounts less than \$100,000.

While the small business segment of AmeriCom's commercial loan portfolio is somewhat proportionally smaller than that of other banks, AmeriCom achieved near-peer levels in a relatively short time period. An analysis of June 30, 1996 Call Report data (the most recent data available) from AmeriCom and other banks of similar size and characteristics from the OCC's six-state Central District (Illinois, Indiana, Kentucky, Michigan, Ohio, and Wisconsin) was performed. Two peer groups were used in the analyses. The *Central District* peer group was comprised of 81 banks with assets from \$300 million to \$500 million. The *Commercial Loan* peer group is a subset of the *Central District* peer, but which most closely resembled AmeriCom's degree of emphasis on commercial lending. The 37 banks in this group had commercial loans representing 30% to 45% of the banks' overall loan portfolios.

Table 6 shows that nearly 25% of AmeriCom's loan dollars outstanding were reported as small business loans, and that for every \$1 million in loans in its portfolio, AmeriCom had 3.5 small business loans outstanding. Both of these characteristics approach peer average. Furthermore, AmeriCom's lending in amounts less than \$100,000 was comparable to peer group levels. The fact that AmeriCom's portfolio characteristics are similar to peer group averages reflects that AmeriCom has been active in small business lending while transitioning from being primarily a mortgage lender. A review of preliminary June 30, 1997 Call Report data indicated that the small business loan segment of the loan portfolio has increased to nearly 29% of all loans.

Table 6 <i>Small Business Lending Peer Group Analysis</i>			
Criteria	Central District Peer Average	Commercial Loan Peer Average	AmeriCom
% of All Loan Dollars which are Small Business Loans	28.3	27.9	24.9
# of SBLs per \$1 Million of Loans Outstanding	4.1	3.8	3.5
% of the Number of SBLs which are < \$100,000	73.2	72.1	73.3

*Source: June 1996 Call Report data from Uniform Bank Performance Report data base as administered by the Federal Financial Institutions Examination Council.
SBL - Small Business Loan*

Small Farm Lending

AmeriCom is not an agriculture lender. As indicated in Tables 1 and 5, agricultural lending represents less than 1% of AmeriCom's lending dollars. Nevertheless, when agricultural loans are made, they are primarily for small farm purposes. A review of June 30, 1996 and preliminary June 30, 1997 Call Report data reflect that over 98% of agriculture loan dollars outstanding were small farm loans. For CRA purposes, *small farm loans* are defined as farming and agriculture-related business loans originated for \$500,000 or less.

Geographic Distribution of Loans

AmeriCom's geographic distribution of credit extensions has been reasonable. This conclusion is based on: 1) a moderately high percentage of AmeriCom's lending activity has occurred within the assessment areas; 2) penetration into all segments of the community has been excellent as loans were made in nearly all census tracts of each assessment area during the evaluation period; and 3) the proportion of mortgage and small business lending in the low-, moderate-, middle-, and upper-income segments of the community has been reasonable.

As reflected in Table 7, 67% of the number of loans and 65% of loan dollars extended between January 1, 1996 and March 31, 1997 were made within the assessment areas, with a significant majority of small business lending activity occurring within the assessment areas. The primary reason that nearly half of Home Purchase loan activity has occurred outside of the assessment areas is that the bank makes indirect loans through mobile home dealers operating throughout the country. If the indirect mobile home loan activity were eliminated from the data, the percentage of the number of Home Purchase loans made within the assessment area would be 72%, and the percentage of loan dollars would be 67%.

Table 7 Lending In and Outside of Assessment Areas (1996-3/97)						
Loan Type	Numbers of Loans			Dollars of Loans (\$000's)		
	In Area	Out of Area	% In Area	In Area	Out of Area	% In Area
Home Purchase	329	283	54%	21,112	15,873	57%
Home Refinance	493	139	78%	33,390	11,339	75%
Home Improvement	38	6	86%	454	43	91%
Multifamily	6	4	60%	5,200	3,085	63%
Small Business	209	82	72%	13,210	9,059	59%
Small Farm	32	23	58%	1,095	829	57%
Total Lending Activity	1,107	537	67%	74,461	40,228	65%

Sources: HMDA data; CRA Disclosure Report data; AmeriCom reports.

Housing Related Lending

AmeriCom's penetration into the community has been excellent, as HMDA-reported loans were made in nearly all census tracts between January 1995 and March 1997. A review of demographic data indicated that no owner-occupied housing units exist in the one tract where no HMDA loans were made.

Market share analyses of HMDA data determined that AmeriCom's lending in low-, moderate-, middle-, and upper-income areas has been reasonable. The analyses used 1995 and 1996 aggregate HMDA for Home Purchase and Home Refinance loans. AmeriCom's share of the Home Improvement market was too small to make meaningful conclusions. As aggregate data for non-MSA areas was not available prior to 1996, our analysis for the Southeast Assessment was limited to 1996 data. Refer to Tables 8 and 9.

While some percentages in low-income and moderate-income categories are higher or lower than the bank's overall market share for that product line, most disparities are represented by relatively few loans. For instance, while AmeriCom made no Home Refinance loans in the four Northwest Assessment Area low-income tracts in 1995, AmeriCom would have needed to make only two low-income area loans to achieve its 6.9% overall market share level. Similarly, while AmeriCom's 1996 Home Purchase share of low-income tracts in the Northwest Assessment Area is high, the difference between the 7.1% overall market share and the 21.7% low-income tract share represents three loans. The only disparity representing more than five loans is AmeriCom's 1996 Home Refinance activity in the Northwest Assessment Area's moderate-income tracts, represented by 14 loans. In drawing our conclusions regarding the reasonableness of HMDA lending in the various tract categories, positive consideration was given to the increasing market share trend of lending in the low-income and moderate-income segments of the Northwest

Assessment Area between 1995 and 1996. Also, AmeriCom was the leading lender in the moderate-income areas of the Southeast Assessment Area for both product lines in 1996.

Table 8 <i>Market Share Analysis - Northwest Assessment Area</i>								
	Home Purchase				Home Refinance			
	1995		1996		1995		1996	
	Market Share	Number of Loans	Market Share	Number of Loans	Market Share	Number of Loans	Market Share	Number of Loans
Low-income tracts	5.6%	2	21.7%	5	0%	0	3.8%	3
Moderate-income tracts	3.4%	4	8.0%	9	5.8%	7	3.6%	7
Middle-income tracts	6.7%	48	7.1%	53	6.2%	23	12.6%	108
Upper-income tracts	5.4%	19	5.9%	21	9.7%	23	11.4%	47
Total	6.0%	73	7.1%	88	6.9%	53	10.7%	165

Source: HMDA data

Table 9 <i>1996 Market Share Analysis - Southeast Assessment Area</i>				
	Home Purchase		Home Refinance	
	Market Share	Number of Loans	Market Share	Number of Loans
Low-income tracts	(There are no low-income tracts in this area)			
Moderate-income tracts	19.7%	23	14.6 %	24
Middle-income tracts	21.3%	154	21.1%	184
Upper-income tracts	7.3%	28	11.5%	61
Total Market	16.7%	205	17.2%	269

Source: HMDA data

The proportion of lending to the various tract categories was found to be reasonably consistent with market demographics and aggregate market loan activity. Table 10 provides information on the Northwest Assessment Area, while Table 11 reflects AmeriCom’s activity in the Southeast Assessment Area. The distribution of owner-occupied housing units is considered to be the

primary demographic indicator regarding home loan opportunities within each segment of the market. Aggregate market data for non-MSA areas is only available for 1996.

While AmeriCom’s performance in the low-income and moderate-income tracts of the Northwest Assessment Area were somewhat low in 1995, activity levels were proportionally higher in most instances in 1996. Similar to the market share analyses, overall performance in both assessment areas is considered to be within a reasonable range given the relative low number of loans represented by the disparities.

Table 10 HMDA Lending by Income Tract Category - Northwest Assessment Area							
Tract Category	The % of the Number of Loans made in the Northwest Assessment Area by the Aggregate Market and AmeriCom				The % of population, families and owner occupied housing units from each tract category		
	Aggregate Market		AmeriCom		Population %	Families %	Owner Occupied Housing Units %
	1995	1996	1995	1996			
Low Income Tracts							
Home Purchase	3.0%	1.8%	2.7%	5.7%	7.5%	6.7%	4.7%
Home Refinance	4.6%	5.1%	0.0%	1.8%			
Moderate Income Tracts							
Home Purchase	9.7%	9.0%	5.5%	10.2%	18.1%	17.4%	15.2%
Home Refinance	15.7%	12.6%	13.2%	4.2%			
Middle Income Tracts							
Home Purchase	58.8%	60.4%	65.8%	60.2%	54.4%	54.6%	57.4%
Home Refinance	48.8%	55.6%	43.4%	65.5%			
Upper Income Tracts							
Home Purchase	28.6%	28.8%	26.0%	23.9%	20.0%	21.8%	22.7%
Home Refinance	30.9%	26.7%	43.4%	28.5%			

Sources: U.S. Census data; HMDA data

Table 11 HMDA Lending by Income Tract Category - Southeast Assessment Area					
Tract Category	The % of the Number of Loans made in the Southeast Assessment Area by the Aggregate Market and AmeriCom in 1996		The % of tracts, population, families and owner occupied housing units from each tract category		
	Market	AmeriCom	Population %	Families %	Owner Occupied Housing Units %
Low Income Tracts	(There are no low-income tracts in this assessment area)				
Moderate Income Tracts					
Home Purchase	9.6%	11.2%	13.1%	12.7%	11.8%
Home Refinance	10.5%	8.9%			
Middle Income Tracts					
Home Purchase	59.1%	75.1%	57.9%	57.9%	57.4%
Home Refinance	55.6%	68.4%			
Upper Income Tracts					
Home Purchase	31.3%	13.7%	29.0%	29.4%	30.8%
Home Refinance	33.9%	22.7%			

Sources: U.S. Census data; HMDA data

Small Business Lending

AmeriCom has penetrated all segments of the community with regard to small business lending. Tables 12 and 13 reflect that the proportion of AmeriCom’s small business lending in each census tract income category was reasonably consistent with the manner in which businesses are distributed within each of the assessment areas. In the Northwest Assessment Area, lending in low-income areas has been quite strong while lending in the moderate-income segments of the community appear low. In the Southeast Assessment Area, it is noted that 80% of the businesses within the area’s moderate-income tracts are located in Marion County. AmeriCom’s lending activity in Marion is considered reasonable given that the bank is relatively new to the Marion market.

Table 12 Small Business Lending by Census Tract Category - Northwest Area 1996-3/97					
Tract Category	The percentage of Lending Activity Occurring in each income tract category				The % of assessment area business located in each income tract category
	Number of Loans		Loan Dollars		
	Count	%	\$(000's)	%	
Low Income	15	22%	512	10%	17%
Moderate Income	6	9%	334	6%	16%
Middle Income	38	56%	3,705	72%	47%
Upper Income	9	13%	603	12%	20%
All Tracts	68	100%	5,154	100%	100%

Sources: CRA Disclosure Report data; Dun & Bradstreet, Inc. business demographic data

Table 13 Small Business Lending by Census Tract Category - Southeast Area 1996-3/97					
Tract Category	The percentage of Lending Activity Occurring in each income tract category				The % of assessment area business located in each income tract category
	Number of Loans		Loan Dollars		
	Count	%	\$(000's)	%	
Low Income	(There are no low-income tracts in this assessment area)				
Moderate Income	12	9%	486	6%	17%
Middle Income	110	78%	5,961	74%	54%
Upper Income	19	13%	1,609	20%	29%
All Tracts	141	100%	8,056	100%	100%

Sources: CRA Disclosure report data; Dun & Bradstreet, Inc. business demographic data

Small Farm Lending

Analyses of small farm lending activity reflect that the geographic distribution of small farm loans has been reasonably proportionate to market characteristics. While AmeriCom did not make any small farm loans to the low- or moderate-income portions of its community during the rating period, Dun & Bradstreet, Inc. business demographic data reflect that only 14 agriculture-related businesses are located in these portions of the market.

Borrower Characteristics

AmeriCom has reasonably addressed the credit needs of individuals at all income levels and businesses of all sizes. This conclusion is based on an analysis of HMDA and small business lending activity.

Housing Related Lending

Market share analyses of 1995 and 1996 aggregate HMDA data was used to assess AmeriCom's lending to low-, moderate-, middle-, and upper-income individuals. We determined that lending to low-income and moderate-income individuals has been adequate, although somewhat proportionally lower than lending to the remainder of the market. Refer to Tables 14 and 15. As aggregate data for non-MSAs was not available prior to 1996, the Southeast Assessment Area analysis was limited to 1996. The analysis was limited to Home Purchase and Home Refinance loans as AmeriCom's share of the Home Improvement market was too small to reach meaningful conclusions.

While some percentages in low-income and moderate-income categories are higher or lower than the bank's overall market share for that product line, half of the disparities are represented by less than five loans. For instance, the difference between the 4.6% share of the low-income Home Purchase market in the Northwest Assessment Area and AmeriCom's overall Home Purchase share of 7.1% represents three loans. AmeriCom would have needed to make three additional loans to low-income individuals to achieve its overall market share for Home Purchase Loans. More prominent disparities are represented by lending to moderate-income individuals in the Southeast Assessment Area as represented by 11 loans for Home Purchase and 13 loans for Home refinance.

In drawing our conclusions regarding the adequacy of HMDA lending in the various borrower income categories, positive consideration was given to the increasing market share trend of lending to low-income and moderate-income individuals in the Northwest Assessment Area between 1995 and 1996. Also, AmeriCom was the leading Home Purchase and Home refinance lender to low-income and moderate-income borrowers in the Southeast Assessment Area in 1996.

Table 14 Borrower Market Share Analysis - Northwest Assessment Area								
Borrower Income Level	Home Purchase				Home Refinance			
	1995		1996		1995		1996	
	Market Share	Number of Loans	Market Share	Number of Loans	Market Share	Number of Loans	Market Share	Number of Loans
Low-income	5.9%	7	4.6%	6	2.9%	2	5.3%	6
Moderate-income	5.1%	15	8.8%	27	3.0%	5	8.7%	30
Middle-income	5.0%	18	6.4%	22	8.2%	15	10.3%	44
Upper-income	6.4%	27	6.8%	29	8.8%	29	12.8%	76
Income not available	-----	6	-----	4	-----	2	-----	-----
Total Market	6.0%	73	7.1%	88	6.9%	53	10.7%	165

Source: HMDA data

Table 15 1996 Borrower Market Share Analysis - Southeast Assessment Area				
Borrower Income Level	Home Purchase		Home Refinance	
	Market Share	Number of Loans	Market Share	Number of Loans
Low-income individuals	18.8%	12	9.4%	8
Moderate-income individuals	12.4%	31	12.5%	35
Middle-income individuals	15.9%	58	13.6%	61
Upper-income individuals	19.3%	103	22.2%	161
Income not available	-----	1	-----	4
Total Market	16.7%	205	17.2%	269

Sources: U.S. Census data; HMDA data

The proportion of AmeriCom’s lending to the low- and moderate-income segments of the populace was found to be somewhat lower than market demographics and the proportion of lending done by the aggregate market. Table 16 compares AmeriCom’s performance in the Northwest Assessment Area to the aggregate market in 1995 and 1996, and provides market demographic characteristics as well. Table 17 reflects AmeriCom’s activity in the Southeast Assessment Area for 1996. Aggregate market data for non-MSA areas is not available for 1995.

AmeriCom’s lending to moderate-income individuals has been reasonable, with substantial increases in the proportion of lending to that segment of the market noted in the Northwest Assessment Area in 1996.

Lending to low-income individuals has been proportionally low compared to the portion of the population within that income category. However, the proportion of aggregate market lending levels is considered to be a more reliable indicator as to lending opportunities within that part of the market. In this regard, AmeriCom’s lending to low-income individuals is considered to have been adequate overall. The proportion of Home Purchase loans to low-income individuals in the Southeast Assessment Area was good in 1996.

Table 16 HMDA Lending to Individuals by Income Category - Northwest Assessment Area					
Income Category and Loan Products	The % of the Number of Loans which were made by AmeriCom and aggregate market to individuals in each income category				The % of families in each income category
	Aggregate Market		AmeriCom		
	1995	1996	1995	1996	
<i>Low Income Individuals</i>					
Home Purchase	9.7%	10.5%	9.6%	6.8%	22.2%
Home Refinance	8.9%	7.4%	3.8%	3.6%	
<i>Moderate Income Individuals</i>					
Home Purchase	24.3%	24.7%	20.6%	30.7%	18.5%
Home Refinance	21.6%	22.3%	9.4%	18.2%	
<i>Middle Income Individuals</i>					
Home Purchase	29.7%	27.5%	24.7%	25.0%	22.1%
Home Refinance	24.0%	27.8%	28.3%	26.7%	
<i>Upper Income Individuals</i>					
Home Purchase	34.5%	34.5%	37.0%	32.9%	37.1%
Home Refinance	43.4%	38.5%	54.7%	46.1%	

Sources: U.S. Census data; HMDA data

Table 17 HMDA Lending to Individuals by Income Category Southeast Assessment Area			
Income Category and Loan Products	The % of the Number of Loans which were made by AmeriCom and aggregate market to individuals in each income category in 1996		The % of families in each income category
	Aggregate Market	AmeriCom	
<i>Low Income Individuals</i>			
Home Purchase	5.2%	5.9%	16.8%
Home Refinance	5.4%	3.0%	
<i>Moderate Income Individuals</i>			
Home Purchase	20.3%	15.1%	16.9%
Home Refinance	17.9%	13.0%	
<i>Middle Income Individuals</i>			
Home Purchase	29.9%	28.3%	24.6%
Home Refinance	28.7%	22.7%	
<i>Upper Income Individuals</i>			
Home Purchase	43.7%	50.2%	41.7%
Home Refinance	46.4%	59.9%	

Sources: U.S. Census data; HMDA data

Small Business Lending

AmeriCom's small business lending predominately addresses the needs of businesses of the smallest size - those with annual revenues less than \$1 million. Table 18 reflects that 86.5% of the number of small business loans made by AmeriCom within its assessment areas between January 1, 1996 and March 31, 1997 were made to this segment of the businesses population. According to Dun & Bradstreet, Inc. June 1996 business demographic data, 71% of businesses located with the bank's assessment areas have annual revenues less than \$1 million. For the Northwest Assessment Area, 81% of the number of loans and 79% of small business loan dollars were made to businesses with annual revenues less than \$1 million whereas demographic data showed that 67% of area businesses had annual revenues under that level. Table 18 also reflects that a significant majority (82%) of the number of small business loans made within the assessment areas were for amounts less than \$100,000, as discussed under the *Lending Activity* section.

Table 18 <i>1996-3/97 Small Business Loans by Size & Revenue</i>						
Loan Size	Total Small Business Lending Activity		Small Business Lending to Businesses with Annual Revenues less than \$1 million			
	# Loans	\$(000's) Loans	Number of Loans Count	%	Dollars of Loans \$(000's)	%
< \$100,000	171	4,850	148	86.5	4,094	84.4
\$100,000 - \$250,000	31	5,144	26	83.9	4,265	82.9
\$250,000 - \$1,000,000	7	3,216	6	85.7	2,741	85.2
Total	209	13,210	180	86.1	11,100	84.0

Source: AmeriCom CRA Disclosure Report data

Small Farm Lending

AmeriCom’s small farm lending serves the credit needs of farms and agricultural-related companies with annual revenues less than \$1 million. A review of 1996 and preliminary information through March 1997 determined that 100% of small farm loans were to this segment of the agricultural community. According to Dun & Bradstreet, Inc. June 1996 business demographic data, 89% of farm-related businesses located with the bank’s assessment areas have annual revenues less than \$1 million.

Community Development Lending

AmeriCom’s community development lending performance has been strong. This conclusion is based on: 1) the volume of community development loans generated, especially in relation to the bank’s size and financial capacity; 2) activity has addressed each of the primary community development credit needs identified in the market; and 3) community development loans have been made throughout the portions of the assessment areas where opportunities have existed. *Community Development Loans* are generally defined as loans which have community development as their primary purpose, as described by the CRA, and have not been reported as small business loans or one-to-four family loans for HMDA purposes.

Community contacts cited affordable housing, economic development, and job training as primary community development credit needs. Each of these needs has been addressed by AmeriCom loans since the beginning of 1995, as the bank originated 13 community development loans totaling \$6.8 million. The majority of these loans were to non-profit organizations, including churches, providing community development services. Examples are:

- o AmeriCom originated a \$2.9 million loan in 1996 to a limited partnership that develops and builds multi-family properties under the Low Income Housing Tax Credits program. The loan provided permanent financing for a 102 unit multi-family structure in Union County for residents with income 60% or less of the area's median income.
- o A \$1 million AmeriCom loan financed a church addition which is used for meetings and educational purposes by members of the local area. The church is located in a moderate-income census tract that is included as part of the City of Marion's strategy for revitalization.
- o AmeriCom provided financing for a long-term housing and medical care facility for low-income senior citizens. AmeriCom's \$1 million loan in 1996 provided the end-financing for the facility, which was part of a rural economic development initiative.
- o In 1995, AmeriCom originated a \$250,000 loan for the development of 37 mobile home park pads, and a \$200,000 loan for the purchase of mobile and manufactured homes that are sold or rented to residents. The residents of this modular home community are primarily low-income.
- o AmeriCom participated in a \$500,000 construction loan in 1995 to the Young Men's Christian Association (YMCA), a non-profit organization in Lima. The purpose of the loan was to renovate 63 housing units that had been vacant for 13 years. The units will provide low-income housing for the homeless with rents subsidized by Metropolitan Housing. In addition, the YMCA offers support groups, counseling, and employment opportunities to these residents. AmeriCom's participation totaled \$50,000.

Innovative and Flexible Lending Practices

AmeriCom has actively employed flexible lending practices, and has demonstrated a willingness to be innovative as well. Creative financing packages have been made to provide customers with loans where traditional financing could not be offered. Examples where the bank accessed special programs or orchestrated financing packages in 1996 and 1997 are as follows:

- AmeriCom made a \$2.9 million fixed rate loan for 15 years to provide permanent financing for a 102 unit multi-family structure for residents with income of 60% or less of area median. AmeriCom does not generally offer commercial 15 year fixed-rate financing. Furthermore, to finance this loan, AmeriCom borrowed funds from the Federal Home Loan Bank which enabled the loan to be made at a reduced rate of interest.
- AmeriCom combined a Rural Housing and Community Development Services guarantee with Ohio Link Deposit funds to provide a \$1 million fixed rate loan at a reduced cost. Proceeds were used to finance the expansion of a nursing care facility.

- A \$24,000 loan was made for the start-up financing of a day care facility in a moderate-income portion of Lima. In practice, AmeriCom does not regularly offer start-up financing. This loan was done in conjunction with the Micro Enterprise Program sponsored by Lima / Allen Council of Community Affairs.

AmeriCom uses special loan programs and government programs to provide financing to customers who would not have access to funds through traditional products. The primary programs that AmeriCom has participated in are as follows:

- o AmeriCom is participating in Project HOPE programs for remodeling low- and moderate-income apartments into condominiums in Bellefontaine (Logan County), and in Marysville (Union County). The program is encouraging home ownership in units which were previously subsidized rental housing. Grants are provided for down payments. Loans made to individuals purchasing the units are made under relaxed credit standards, including debt ratios, length of employment, and handling of collections accounts. Through the first quarter of 1997 AmeriCom made three loans for \$70,700 in Logan County and two loans for \$55,000 in Union County.
- o AmeriCom has made loans in conjunction with the Rural Housing and Community Development Services (Formerly known as Farmers Home Administration). This U.S. Department of Agriculture agency provides financing to farmers for working capital and long term financing. The rural housing program is designed to assist low- and moderate-income families by providing 100% financing, a flexible feature. AmeriCom made 41 loans totaling \$2.6 million from January 1995 through March 1997.
- o AmeriCom began offering Fannie Mae 97 mortgages in 1995. This low-down payment product features flexible underwriting criteria to borrowers whose income does not exceed 100% of median area income. AmeriCom made 13 loans totaling \$692,000 under this program between January 1995 and June 1997.
- o AmeriCom actively makes U.S. Small Business Administration (SBA) lending options available to its customers. SBA lending is considered flexible as given their risk profiles, the substantial majority of SBA customers: 1) gain access to credit which they would not normally qualify for without the SBA guarantee; or 2) obtain credit with terms and conditions that are more favorable to the customer. For example, the SBA 504 Development Company Loan Program uses partnerships to finance fixed assets which can result in allowing longer terms at a reduced fixed rate of interest. The LowDoc program allows the bank to provide financing with relaxed collateral requirements. AmeriCom has extended loans under these and other SBA programs. AmeriCom made 11 SBA loans totaling \$2.2 million from January 1995 through March 1997.
- o AmeriCom has participated in the State of Ohio Link Deposit program. The program provides an injection of funds within the banking community specifically for creating

lower-cost capital for Ohio businesses. The program represents flexible underwriting as it provides loans at interest rates that are lower than typically available to customers with similar risk profiles. AmeriCom made three loans totaling \$1.3 million from January 1995 through March 1997 under this program.

- o AmeriCom participates in the County Community Housing Improvement Program (CHIP) loan program in Logan County. The program is considered flexible as it provides assistance for down payment and closing costs to low- and moderate-income applicants. AmeriCom waives private mortgage insurance and title insurance requirements. AmeriCom made one CHIP loan for \$45,200 in 1996.

Investment Test

AmeriCom's investment performance has exhibited adequate responsiveness to the credit and economic development needs of the community, especially considering the bank's relatively low earnings record discussed within the *Description of Institution* section. Community contacts cited affordable housing, economic development, and job training as primary community development needs. Other than supporting local organizations through grants, no qualified community development investment opportunities were identified through community contacts.

AmeriCom investments have been in the form of grants to organizations whose primary purpose is economic development within low- or moderate-income areas. In addition, grants were provided to a number of organizations that provided social services to low-income persons. While AmeriCom's investments are not considered innovative or complex in nature, they do address the needs of the market consistent with the investment opportunities identified within the market.

AmeriCom's community development investments totaled \$75,258 from January 1995 through December 1996. This volume is reasonable based on the limited number of investment opportunities identified in the local area and AmeriCom's earnings record. AmeriCom has provided community development grants to more than 25 organizations during 1996 and 1997. Examples are: Bradfield Community Center; Lima / Allen Council of Community Affairs Micro Enterprise Program; Lima/Allen Chamber of Commerce; Marion Can Do; Rehab Project; United Way; and Visionary Allen County.

Service Test

AmeriCom has a good record of supporting the community through the provision of services. This conclusion is based on the following: 1) offices and ATMs are reasonably accessible to all portions of the assessment areas. A proportionally high number of offices and ATMs are located within low- and moderate-income areas; 2) Business hours at offices have been expanded and are tailored to the needs of the community; 3) New offices and ATMs have improved AmeriCom's accessibility to low- and moderate-income individuals in portions of the Northwest Assessment Area; and 4) AmeriCom provides an adequate level of community development services.

Retail Banking Services

AmeriCom has 13 banking offices, including one branch located in a grocery store. The overall distribution of branches and ATMs is weighted favorably toward the low-income and moderate-income sectors of the assessment areas. As reflected by Table 19, 31% of offices and ATMs are located in tract categories representing 18% of the local population.

Table 19 <i>Distribution of Delivery Systems</i>						
Census Tract Income Category	Offices		ATMs		Assessment Area Characteristics	
	Number	% of Total	Number	% of Total	Distribution of Tracts	Distribution of Families
Low Income	1	8%	1	8%	6%	3%
Moderate Income	3	23%	3	23%	21%	15%
Middle Income	5	38%	5	38%	52%	56%
Upper Income	4	31%	4	31%	21%	26%
Total	13	100%	13	100%	100%	100%

Source: AmeriCom records

Note: Table reflects only deposit-taking ATMs

Branches serving the low- and moderate-income neighborhoods offer products and services in a manner consistent with branches in the other segments of the community. While staffing of product and service experts at branches vary to some degree, all AmeriCom products and services are available through any location. Lenders will readily make appointments to meet with customers at any bank office or other location of the customer's choice including their residence or place of business. The bank's "mortgage hotline" allows applicants to call in by telephone to apply for a loan or ask questions of a loan officer 24 hours a day.

AmeriCom's branch office hours are tailored to the needs of the local community. Office hours were expanded during the rating period. All offices, with the exception of one branch in a moderate income tract in Marion, maintain Saturday hours. The in-store branch in Lima is also open on Sunday. In aggregate, branches serving the low- and moderate-income neighborhoods maintain service hours in a manner consistent with branches in the other segments of the community.

Management determined it necessary to realign its branching structure. As a result of merger and acquisition activities, AmeriCom had three full-service and one drive-through office within a two-mile radius in the city of Bellefontaine, and a total of seven offices in Logan County. This was considered too many offices to be supported by the Logan County populace. 1990 U.S. Census data reflects that Logan County has a total population of 42,310. After holding a series of meetings with the community, a full service office and a drive-through office in Bellefontaine were closed. Both offices were located in middle-income tracts. Within those tracts were 423 low-income families and 438 moderate-income families. The office closures did not adversely effect the area's populace to a significant degree due to the relatively close proximity of two remaining AmeriCom offices in Bellefontaine.

As part of its office realignment, AmeriCom opened two offices in Lima, doubling the number of offices in the Northwest Assessment Area. This improved the accessibility of AmeriCom's delivery systems in that area. While one new office is located in a high-income tract, and one is in a middle-income tract, they are accessible to individuals of all income categories. Within the two census tracts the new offices are located, 245 low-income families and 280 moderate-income families reside. This represents 5% of low- and moderate-income families within the assessment area. One of the new offices is within a grocery store, and is open seven days a week.

Alternative Delivery Systems

As reflected in Table 19, AmeriCom maintains 13 deposit-taking ATMs, 12 of which are located at branch offices. One additional cash-dispensing only ATM is also located in the Southeast Assessment Area. AmeriCom added four new deposit-taking ATMs and the cash-dispensing ATM to its system since January 1995. While all new ATMs are located in middle and high income neighborhoods, the populace in those areas includes individuals from all income categories. In the tracts in which the new ATMs are located, 644 low-income families and 738 moderate-income families reside.

In conjunction with the Bank's Basic Checking product, which is targeted towards low-income persons, AmeriCom provides the **Visa Check Card**, a point of sale debit card. The Check Card allows customers the convenience of accessing their checking account without having to write a check. The debit card is also provided to other deposit customers as well.

Additional AmeriCom programs are actively offered and provided to the entire community, including low- and moderate-income areas and to low- and moderate-income individuals. The characteristics of the programs enhance the delivery of products to the market as a whole, including the low- and moderate-income segments. As data demonstrating the extent that they are used by the low- and moderate-income segments of the community is not available, significant weight cannot be placed on these programs when drawing CRA performance conclusions. Nevertheless, the programs demonstrate AmeriCom's commitment to finding alternative ways to deliver products to the market.

- **Telebanc**, a 24 hour account information system. Telebanc allows a bank customer to obtain information about checking and savings accounts, and to transfer funds between existing accounts.
- The **1/10 Program** is a service to mortgage applicants that provides a loan approval decision within one hour and ability to close the loan within 10 days. If the loan closing cannot occur within 10 days due to the bank processing procedures, the closing costs are waived. This service is considered innovative.
- **Mortgage Connection** is an innovative 24- hour 1-800 number service that can be used by a caller to obtain basic information on mortgage products, pre-qualify for a mortgage, or generate an application. Bank staff members support the service 24 hours a day.
- **Watch 'N Save** is an innovative service available to all AmeriCom mortgage customers and non-customers. Rates on AmeriCom mortgage products and the mortgage status of Watch 'N Save customers are continuously monitored. Customers are informed when it may be advantageous for them to consider refinancing with AmeriCom products.
- AmeriCom offers two Internet functions: e-mail access and Mortgage Calculator. Mortgage Calculator allows pre-qualification calculations of residential mortgage loans.

Community Development Services

AmeriCom has provided an adequate level of community development services, as summarized below:

- o Bank employees are actively involved in organizations whose primary purpose is to provide economic development or other financial services to low- or moderate-income persons. At times, AmeriCom employees are in leadership roles. Examples of these organizations from both assessment areas are:
 - Allen County Visionaries
 - Business Education Partnership

- City of Lima Mayors Group
 - Chamber of Commerce (Union County)
 - Downtown Business Association
 - Housing Rehab Program
 - Indian Lake Development Corporation
 - Lakeview Improvement Association
 - Lima/Allen Counsel on Community Affairs
 - Marion Crawford Community Action Commission
 - Union County Builders/Realtors Association
- o AmeriCom employees have participated in or conducted a number of seminars and workshops, including those for community home buyers, affordable housing, government loan programs, small business financing , and credit counseling for low- and moderate-income individuals.
 - o AmeriCom offers **Basic Checking**, a low-cost limited activity account targeted towards low-income persons. There is no minimum balance, low monthly fee, 15 checks per month at no charge, overdraft protection, and issuance of a Visa CheckCard.
 - o Bank offices and equipment have been used by community development-oriented organizations. For instance, the Lima main office was used in 1995 and 1996 for Rehab Project's Affordable Housing training seminars.

Fair Lending Review

AmeriCom has effective fair lending policies, procedures, training programs, and internal monitoring processes in place. We reviewed purchase money mortgage loan applications from the second half of 1996. No violations of the substantive provisions of the antidiscrimination laws and regulations have been identified, including the Equal Credit Opportunity Act, Fair Housing Act, or Home Mortgage Disclosure Act.

Conclusions with Respect to Performance Tests in the Lima, Ohio MSA (The Northwest Assessment Area)

AmeriCom's performance in the Lima MSA is consistent with the bank's overall performance. The bank's performance within this area was an important factor in assigning the bank's overall rating, as a sizeable portion of the bank's operations and community are represented by the Lima MSA.

APPENDIX

Scope of Evaluation

The evaluation assessed AmeriCom's performance as outlined below:

- Both assessment areas were evaluated using examination procedures.
- The period of review was December 31, 1994 (the date of the last examination) to date.
- Primary loan data considered consisted of home mortgage and small business loans.
- No affiliate lending performance was considered.
- Three banking offices were visited.