



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Park National Bank
Charter Number: 9179

50 North Third Street
Newark, Ohio 43058

Office of the Comptroller of the Currency

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

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

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Overall CRA Rating

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

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

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

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

The major factors that support this rating include:

- The Park National Bank’s (PNB) lending performance is good. The bank has a generally strong record of lending to the low- and moderate-income segments in the State of Ohio and its primary market in the Columbus, Ohio Metropolitan Statistical Area (MSA).
- The bank’s overall level of qualified investments is excellent. PNB has an excellent record of investments in the Columbus, Ohio MSA Assessment Area (AA) and an excellent record of investment performance in the Multistate AA. PNB’s responsiveness to the identified investment needs of its AAs is adequate.
- The bank’s performance under the Service Test is good overall. The accessibility of the bank’s branches to residents in low-and moderate-income geographies is the main factor contributing to the overall Service Test rating. The distribution of PNB’s branches is good for the Columbus MSA AA and adequate for the Multistate AA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

The Park National Bank (PNB) is a \$6.2 billion interstate bank headquartered in Newark, Ohio. PNB has a total of 127 full service branches and 146 ATMs. The bank has 11 assessment areas (AAs) in Ohio and Kentucky. Since the last CRA examination in August 2006, PNB has grown from \$2 billion in assets to \$6.2 billion as of June 30, 2010. The growth is primarily the result of a consolidation of Ohio-based bank charters into PNB.

PNB is a subsidiary of Park National Corporation (PRK), a \$7.1 billion two-bank holding company headquartered in Newark, Ohio. PNB consists of 11 community bank divisions and two specialty finance companies. PNB's Ohio-based banking operations are conducted through PNB's subsidiary. PNB and its divisions, which include Fairfield National Bank, Richland Bank, Century National Bank, First-Knox National Bank, Farmers and Savings Bank, United Bank, Second National Bank, Security National Bank, Unity National Bank and The Park National Bank of Southwest Ohio & Northern Kentucky. PNB also includes Scope Leasing, Inc (d.b.a. Scope Aircraft Finance) and Guardian Finance Company. PRK's other banking subsidiary is Vision Bank (headquartered in Panama City, Florida), and its Vision Bank Division (Gulf Shores, Alabama). PRK acquired Vision Bancshares, Inc. on March 9, 2007.

PNB offers a full range of credit products, depository accounts, trust services, and retail non-deposit investment services. The bank's primary focus is residential real estate lending and commercial real estate lending. PNB also offers installment loans to individuals and commercial and industrial loans.

As of June 30, 2010, net loans and leases represented 62.6% of total assets. The \$3.8 billion loan portfolio consisted of residential real estate (36.6 percent), commercial real estate (27.8 percent), commercial and industrial loans (14.8 percent), loans to individuals (16.5 percent), agriculture (2.2 percent) and other loans (2.0 percent).

On July 30, 2007, Park announced a plan to review current processes and identify opportunities to improve efficiency by converting to one operating system. An outcome of this initiative, was the consolidation of the eight banking charters of PRK's Ohio-based subsidiary banks into one national bank charter, PNB, which was completed during the third quarter of 2008.

No legal, financial or other factors impede the bank's ability to help meet the credit needs of its assessment areas during the evaluation period. The bank received a "Satisfactory" rating at the last CRA examination dated August 28, 2006.

Scope of the Evaluation

Evaluation Period/Product Evaluated

We analyzed home purchase, home improvement and home refinance mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses that the bank reported under the Community Reinvestment Act. The Evaluation period for home mortgage loans and small loans to businesses was January 1, 2007 through December 31, 2009. We analyzed community development loans, qualified investments and community development services from August 28, 2006 (the date of the last evaluation), through December 31, 2010. While PNB originates some agricultural and multi-family property loans, these loan types comprise a very small percentage of the bank's lending activity and had volumes too small for meaningful analysis. However, information regarding the number and volume of these loans is presented in the corresponding tables found in Appendix D for each rating area.

Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of community development activities provided for consideration in our evaluation. This review included the testing of community development loans, investments, and services for accuracy and to determine if they qualify for consideration for this evaluation. We determined that the data reported publicly and the additional data provided for this evaluation are accurate.

Selection of Areas for Full-Scope Review

We selected two assessment areas for a full-scope review. The bank's performance in the Columbus, Ohio MSA AA as well the Multistate AA was reviewed using full-scope procedures. Full-scope reviews consider performance context, and quantitative and qualitative factors. PNB's Columbus, Ohio MSA AA has the largest percentage of deposits of the bank's AAs in the state, while the Multistate AA includes a portion of Northern Kentucky, which requires a full-scope review.

PNB also includes 15 non-urban counties in its AA; these 15 counties are titled as the Ohio Non-MSA AA and were aggregated as one AA for analysis purposes. Additionally, PNB includes three MSAs (Dayton, Mansfield, and Springfield) in its AA, which were reviewed separately for analysis purposes. The Ohio Non-MSA, Dayton MSA, Mansfield MSA, and Springfield MSA AAs were evaluated using limited-scope procedures. Refer to the "Description of the Institution's Operations" section under each AA rating for details on how the areas were selected.

Ratings

The bank's overall rating is a blend of the State of Ohio and Multistate Metropolitan Area ratings. The State of Ohio rating carried the greatest weight in our conclusions as it represents the bank's most significant market in terms of deposit concentration, as well as lending,

investment and service activity. AAs in order of importance are the Columbus MSA AA (38.48 percent of deposits), the Ohio Non MSA AA (33.09 percent of deposits), the Mansfield MSA AA (10.02 percent of deposits), the Springfield MSA AA (8.11 percent of deposits), the Dayton MSA AA (5.21 percent of deposits), and the Multi-State AA (5.09 percent of deposits).

State ratings are based primarily on those areas that received full-scope reviews, but proportional consideration was given to bank's performance in areas receiving limited scope reviews. Refer to the "Conclusions for Areas Receiving Limited-Scope Reviews" section under each test in each AA for details regarding how the areas were weighted in arriving at the overall rating.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Other Information

Community Contacts

We reviewed information from contacts made during the evaluation period with a variety of groups and organizations to identify financial and credit needs and opportunities within PNB's AAs. We conducted two contacts in the bank's Columbus, Ohio MSA AA area, one contact in the Ohio Non-MSA AA and reviewed one recent community contact conducted in Multistate AA. Interviews were conducted with community action agencies, economic development organizations and a low-income housing specialist. Information from community contacts for the Primary Rating Areas is summarized in the Community Profiles found in Appendix C.

Lending Gap Analysis

We reviewed summary reports and analyzed PNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distributions of loans. We determined that all of the bank's AAs consist of whole geographies, meet the requirements of the Community Reinvestment Act regulation, and do not arbitrarily exclude any low- or moderate-income areas. We considered the low level of penetration of home mortgage loans in the low- and moderate-income geographies within the Multistate AA, the low level of penetration of home mortgage loans in the low-income geographies within the Columbus, Ohio MSA AA, and the low level of penetration of home mortgage loans in the moderate-income geographies within the Ohio Non-MSA AA.

Inside/Outside Ratio

A substantial majority of originated and *purchased* loans reported during the evaluation period are within the bank's AA. A substantial majority of home mortgage loans and small business/farms lending during the evaluation period was within the bank's AAs. Ninety-four percent of the number of home mortgage loans (94 percent home purchase, 95 percent of home refinance, 94 percent of home improvement) and 93 percent of home mortgage loan

dollars (89 percent of home purchase, 94 percent of refinance, 93 percent of home improvement) are located within the bank's AAs. Ninety-four percent of the number of small business loans and 94 percent of the small business loan dollars are located in the bank's AAs. Ninety-two percent of the number of small farm loans and 89 percent of the loan dollars are located within the bank's AAs. A substantial majority of all community development loans are located within the bank's AAs. These calculations are done on a bank-wide basis. This record of lending in the AAs did not significantly impact geographic distribution conclusions.

Flexible and Innovative Loan Programs

PNB offers "Welcome Home" loans, an affordable housing assistance program which provides down payment closing cost assistance to low- and moderate-income homebuyers. During the evaluation period, PNB originated \$4 million in "Welcome Home loans, with the Columbus MSA AA responsible for 14 loans or 22 percent of dollar volume and the Ohio Non MSA AA responsible for 39 loans or 67 percent of the dollar volume.

Factors Considered in our Analysis Under the Performance Tests

Lending Test - We considered the bank's home mortgage and small business/farm lending in determining lending performance where sufficient data was available to conduct a meaningful analysis. Geographic and borrower distribution analyses were generally given equal weight, *with community development activity given significant consideration in rating areas where the bank made an exceptional volume of these loans in terms of dollars.*

Investment Test – We generally gave equal consideration to the volume of investments and grants made in the current evaluation period and the qualified investments that had outstanding balances on the bank's books from the prior evaluation period. *Additional, but lesser consideration was given to investments made by the bank in state-wide funds within the state or broader regional area that includes the bank's AAs but not located within the bank's AAs, provided that the bank had an adequate level of investments in its AAs.*

We evaluated the responsiveness of those investments to the community's identified needs. We also compared the dollar volume of qualified investments in each AA to the dollar volume of Tier I capital allocated to that AA to gauge the level of qualified investments on an AA, state-wide and bank basis.

Service Test - We gave primary consideration to PNB's performance in ensuring that low- and moderate-income people and areas had reasonable access to the bank's branches and ATMs. We evaluated the impact of branch openings and closings on accessibility for low- and moderate-income people and areas. We also considered the range of products and services and the convenience of business hours in low- and moderate-income areas compared to those in middle- and upper-income areas to determine if there were differences. We also evaluated the impact of community development services provided by the bank.

Multistate Metropolitan Area Rating

Cincinnati-Middletown, OH-KY-IN Multistate Metropolitan Area (#17140)

CRA rating for the Multistate AA, OH-KY-IN: Low Satisfactory

The lending test is rated: Low Satisfactory

The Investment test is rated: Outstanding

The Service test is rated: Low Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans in the Multistate AA is adequate.
- The borrower distribution of loans in the Multistate AA is good.

Description of Institution's Operations in Cincinnati-Middletown, OH -KY- In Multi-State Metropolitan Area

PNB operates 12 branches and nine deposit taking ATMs in the multi-state AA. The AA includes portions of Ohio and Kentucky. These branches represent nine percent of the bank's total branch network. Of the 12 branches in the AA, one branch is located in Kentucky in a moderate-income tract. The remaining 11 branches are located in Ohio with one in a moderate-income tract, seven in middle-income tracts and three in upper-income tracts. The bank's AA includes a portion of the Cincinnati-Middletown, OH-KY-IN MSA # 17140 and is comprised of four counties in Ohio (Butler, Clermont, Hamilton, and Warren Counties) and one county in Kentucky (Boone County). All counties surround the City of Cincinnati.

Scope of Evaluation in Cincinnati-Middletown, OH-KY-Multistate Metropolitan Area

The Cincinnati-Middletown AA, or Multistate AA, received a full-scope review. Deposits in the Multistate AA represent 5.09 percent of the bank's total deposits. As such, the performance in this AA did not have a significant impact on the bank's overall CRA rating.

In conjunction with this evaluation, we reviewed one recently conducted community contact with a community organization that serves Hamilton and Butler Counties. The organization is non-profit and provides financial literacy courses, credit counseling and manages a small complex of affordable housing rental units. Based on information from this contact, ample opportunities are available for banks to participate in community development for financing programs in Hamilton and Butler Counties. There are also opportunities to support microenterprises and participate in micro-lending. Based upon this contact the primary needs in the AA are affordable housing loans, foreclosure prevention counseling and social services.

Refer to the market profiles for the Multistate AA in Appendix C for detailed demographics and other performance context information for this AA that received a full-scope review.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Multistate MSA AA is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Multistate MSA AA is adequate based on adequate geographic distribution of loans and good borrower distribution of loans.

Lending Activity

Refer to Table 1 Lending Volume in the Multistate MSA AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

PNB's lending activity in the Multistate MSA AA is adequate, considering the strong level of competition in the market. In the AA, PNB ranks 19th in deposits among 67 depository institutions and has a 0.47 percent share of the market according to the June 30, 2009 FDIC deposit data. However, with over 400 mortgage lenders operating in the AA, the majority of which are not depository institutions, and almost 100 small business lenders, PNB's lending market shares are lower than its deposit share.

PNB's primary lending products in the Multistate MSA AA are home mortgage loans (primarily home refinance loans and home purchase loans) and small loans to businesses. Of all the HMDA and CRA loans reported by PNB as originated or purchased in this AA during the evaluation period, home mortgage lending (home refinance loans and home purchase loans) represented 53 percent and small loans to businesses represented 43 percent. According to 2008 aggregate HMDA data, PNB ranked 53rd (out of 474 mortgage lenders) in mortgage loan originations/purchases within the AA with a 0.31 percent market share based on the number of loans. According to 2008 aggregate CRA data, PNB ranked 24th (out of 96 small business lenders) in small business loan originations/purchases within the AA with a market share of 0.37 percent based on the number of small business loans. PNB market share, based on the dollar amount of loans, is 2.01 percent.

Given that PNB's level of multi-family loans was so low (1 percent of all loans reported by PNB in this AA for this review), no analysis of this product was performed. Additionally, home improvement loans (2 percent of all loans reported by PNB in this AA for this review) and small loans to farms (1 percent of the total) were given minimal consideration for this review given PNB's low level of activity. However, PNB's activity for these products is included Appendix D: Tables of Performance Data.

Distribution of Loans by Income Level of the Geography

The geographic distribution of PNB's loans in the Multistate MSA AA is adequate. This is based on an adequate geographic distribution record of home purchase loans, home improvement loans, and small loans to businesses and a poor distribution record of home refinance loans.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Multistate AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination of home mortgage loans.

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of the Multistate AA is very small. Less than three percent of the housing units are located in those segments of the community. This has an impact on the opportunity to lend in the low-income neighborhoods.

The geographic distribution of home purchase, and home improvement loans is adequate based primarily on the bank's performance in the moderate-income geographies in the AA. The bank's percentage of home purchase lending in moderate-income geographies was near to the percentage of owner-occupied units in moderate-income geographies. PNB's percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied units in that segment of the AA. The percentage of PNB's home purchase loans in low-income geographies is below the percentage of owner-occupied housing units located in those areas. PNB did not make any home improvement loans in low-income geographies during the evaluation period. PNB's market share for home purchase lending in moderate-income tracts exceeded its overall market share for home purchase lending in this AA. The bank's home improvement lending market share in low- and moderate-income geographies was consistent with its overall market share in this AA.

PNB's geographic distribution of home refinance lending is poor. PNB's home refinance lending in moderate-income geographies was lower than the percentage of owner-occupied units in moderate-income geographies. The percentage of PNB's home refinance loans in low-income geographies was significantly lower than the percentage of owner-occupied units in those areas. The bank's home refinance lending market share in low- and moderate-income geographies was consistent with its overall market share in this AA.

Small Loans to Businesses

Refer to Table 6 in the Multistate AA of Appendix D for the facts and data used to evaluate the geographic distribution of small loans to businesses.

PNB's geographic distribution of small loans to businesses is adequate, based primarily on performance in the moderate-income areas. PNB's lending to businesses in moderate-income geographies exceeds the percentage of businesses moderate-income geographies, while lending to businesses in low-income geographies is less than the percentage of businesses in low-income geographies. Less than six percent of the AA's businesses are located in low-income areas, impacting the bank's opportunity to lend.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of PNB's loans in the Multistate MSA AA is good. This conclusion is based upon excellent home purchase and home improvement loan distribution records, good home refinance loan distribution, and adequate small business loan distribution.

Home Mortgage Loans

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income segment of the population in the community. Refer to the Market Profiles in Appendix C for the demographic information, including poverty rates, for the Multistate AA.

PNB's distribution of home purchase and home improvement loans to borrowers of different incomes is excellent and the distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers exceeds the percentage of families in the Multistate AA for all three home mortgage loan product types. The percentage of home improvement loans to low-income borrowers also exceeds the percentage of families in the AA. The percentage of home purchase and home refinance loans to low-income borrowers, while lower than the percentage of low-income families in the AA, still reflects good performance.

Refer to Tables 8, 9, and 10 in the Multistate AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

Small Loans to Business

The borrower distribution of small loans to business is adequate. The percentage of loans to businesses with revenues of \$1 million or less is slightly less than percentage of small businesses in the AA. Refer to Table 11 in the Multistate AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

Small Loans to Farms

The borrower distribution of small loans to farms is excellent. The percentage of loans to farms with revenues of \$1 million or less exceeds the percentage of small farms in the AA. Refer to Table 12 in the Multistate AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to farms.

Community Development Lending

Refer to Table 1 Lending Volume in the Multistate AA section of Appendix D for the facts used to evaluate the bank's level of community development (CD) lending. The table includes all CD loans.

The bank's record of originating CD loans in the Multistate AA is good. During the evaluation period, PNB originated two CD loans totaling \$2.611 million in the area. The CD loans were made to organizations that provide low- and moderate- income housing. CD lending had a positive impact on the overall lending test rating in the Multistate AA.

Product Innovation and Flexibility

The CD loans made in each assessment area were not viewed as innovative or complex. The CD loans were originated for working capital, affordable housing, small-business, equipment loans, and economic development.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

PNB's overall Investment Test performance in the Multistate AA is rated "Outstanding". PNB's responsiveness to the identified investment needs of the assessment area is adequate, especially in the area of affordable housing.

During the evaluation period, PNB originated seven qualified investments and donations totaling \$1.910 million in the Multistate AA. In addition, the prior period investments (still outstanding) equated to seven investments with a remaining balance of \$556 thousand as of December 31, 2009.

The majority of PNB's qualified investments respond to the state's need for affordable housing through low-income housing tax credits (LIHTC). The largest qualified investment made in the current period was to the Ohio Capital Corporation for Housing (OCCH) which is an independent, mission-driven nonprofit corporation that works with private and public developers to create affordable housing opportunities.

Refer to Table 14 in the Multistate AA section of Appendix D for the facts and data used to evaluate the level of qualified investments in the Multistate AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

PNB's performance under the Service Test in the Multistate AA is rated "Low Satisfactory".

Refer to Table 15 in the Multistate AA section of Appendix D for the facts and data used to evaluate the distribution of bank's branch delivery system and branch openings and closings.

Retail Banking Services

The distribution of bank branches in both low- and moderate-income geographies for the Multistate AA is adequate. The branch distribution in low- or moderate-income geographies is below the percentages of the population that reside in those geographies, but is still adequate. Two offices, 16.67 percent of total branches for this AA, are located in low- or moderate-income geographies compared to 24.90 percent of the population living in low- or moderate-income geographies. PNB has zero branches located in a low-income geography although seven percent of the population resides within this geography. The accessibility of bank ATMs

to low- and moderate-income geographies is poor. PNB only operates one ATM in a low- or moderate-income geography (11.11 percent of total ATMs) compared to 24.90 percent of the population living in within these geographies.

During the evaluation period, the bank opened one branch (moderate geography) in the Multistate AA while closing two (middle and upper-income geographies). The branch opening and closings had a positive impact on the accessibility of branches to residents in low- and moderate-income geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AAs. Branch hours are reasonable and include extended hours at some locations through the week, with some branches also open for limited hours on Saturday and Sunday.

Community Development Services

PNB provided minimal Community Development Services to the Multistate AA during the evaluation period.

State Rating

State of Ohio

CRA rating for the State Ohio is High Satisfactory

The lending test is rated High Satisfactory

The Investment test is rated Outstanding

The Service test is rated High Satisfactory

The major factors that support this rating include:

The Columbus, Ohio MSA AA (Columbus, Ohio MSA 18140) accounts for 41 percent of the bank's deposits in the state of Ohio which significantly impacts the bank's ratings.

- The borrower distribution of PNB's home mortgage and small business lending is good in both the Columbus, Ohio MSA AA and the Ohio Non-MSA AA.
- The geographic distribution of PNB's home mortgage and small lending is good in the Columbus, Ohio MSA AA, and the geographic distribution is adequate in the Ohio Non-MSA AA.
- The Columbus, Ohio MSA AA (Full-Scope Review) and the Ohio Non-MSA AA (Limited Scope Review) account for over 75% of the bank's deposits in the State of Ohio, which significantly impacts the overall state ratings.

Description of Institution's Operations in State of Ohio AA

PNB operates 115 branches and 137 deposit-taking ATMs in the State of Ohio. These branches represent 90.55 percent of the bank's total branch network. The bank's AA in the State of Ohio includes four MSAs, and 15 counties that make up the Ohio Non-MSA AA. Refer to Appendix A for a listing of the areas that comprise the State of Ohio AAs.

Scope of Evaluation in State of Ohio

The Columbus Ohio MSA AA was selected for a full-scope review due to its high concentration of deposits (38.48 percent), and reported loans (35.40 percent) within the state. This concentration of deposits in the Columbus, Ohio MSA AA exceeds those in the Ohio Non-MSA AA (33.09 percent), Mansfield MSA AA (10.02 percent), Springfield MSA AA (8.11 percent), and Dayton MSA AA (5.21 percent). The Ohio Non-MSA AA, Mansfield MSA AA, Springfield MSA AA and the Dayton MSA AA were analyzed using limited-scope procedures. Deposits in the State of Ohio represent 94.91 percent of the bank's total deposits. PNB's performance within the State of Ohio has the most significant impact on the bank's overall CRA rating.

In conjunction with this evaluation, we interviewed three community contacts, two that serve the Columbus, Ohio MSA AA, and one which serves the Ohio Non-MSA AA. The primary purpose of two of the organizations is to serve low-income residents, providing services that include housing assistance, health services, family planning and senior services. The other

organization provides planning services and developmental efforts for the mobilization of resources for coordinated remedial attacks upon conditions of poverty affecting inhabitants of the AA. Based on information from these contacts there are adequate opportunities for banks to participate in both the Columbus, Ohio MSA AA and the Ohio Non-MSA AA. Descriptions by the contacts of the local economy ranged from dire to strained. The most pressing credit needs communicated were affordable housing and loan modification programs.

Refer to the market profile for the Columbus, Ohio MSA AA in Appendix C for detailed demographics and other performance context information for this AA that received a full-scope review.

LENDING TEST

Conclusions for Area Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Ohio is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Columbus, Ohio MSA AA is good.

Refer to Table 1 in Lending Volume in the Columbus, Ohio MSA AA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending Activity

PNB's lending activity in the Columbus, Ohio MSA AA is good. In this AA, PNB ranked sixth in deposit market share among 52 depository institutions and had a 4.74 percent share of the market according to the June 30, 2009 FDIC deposit data.

PNB's primary lending products in the Columbus, Ohio MSA AA are home mortgage loans (primarily home refinance loans and home purchase loans) and small loans to businesses. Of all the HMDA and CRA loans reported by PNB in this AA, home mortgage lending (home refinance loans and home purchase loans) represented 51 percent and small loans to businesses represented 42 percent. According to reported HMDA data, PNB had a 2.25 percent market share for the number of home refinance loans it made and a 1.34 percent market share for the number of home purchase loans it made. According to reported CRA data, PNB had a 2.21 percent market share in terms of the number of small business loans it made.

Given that PNB's level of multi-family loans was so low (0.18 percent of all loans reported by PNB in this AA for this review), no analysis of this product was performed. Additionally, home improvement loans (4.37 percent of all loans reported by PNB in this AA for this review) and small loans to farms (2.95 percent of the total) were given minimal consideration for this review given PNB's low level of activity. However, PNB's activity for these products is included Appendix D Tables of Performance Data.

Distribution of Loans by Income Level of the Geography

The geographic distribution of PNB's loans in the Columbus, Ohio MSA AA is good. This is based on a good geographic distribution record of home purchase, home refinance, and home improvement loans and an excellent distribution record of small loans to businesses and small loans to farms.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Columbus, Ohio MSA AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

In evaluating the geographic distribution of home mortgage loans, we considered that the number of owner-occupied housing units located in the low-income neighborhoods of the Columbus, Ohio MSA AA is very small. Approximately three percent of the housing units are located in those areas of the community. This has an impact on the opportunity to lend in the low-income neighborhoods.

The geographic distribution of home purchase, home refinance, and home improvement loans is good based primarily on the bank's performance in the moderate-income geographies in the AA. PNB's percentages of home purchase, home refinance and home improvement lending in moderate-income geographies exceed the percentage of owner-occupied units in moderate-income geographies. The percentages of PNB's home purchase and home refinance lending in low-income geographies is significantly less than the percentage of owner-occupied units in low-income geographies. PNB did not make any home improvement loans in low-income geographies during the evaluation period. In addition, the bank's market share for home purchase, home refinance and home improvement loans made in moderate-income geographies significantly exceeds its overall market share for home mortgage loans made in this AA.

Small Loans to Businesses

Refer to Table 6 and 7 in Appendix D for the facts and data used to evaluate the geographic distribution of small loans to businesses and farms.

PNB's activity for small loans to businesses represents excellent performance. PNB's lending to businesses in low-income geographies is near to the percentage of businesses in low-income geographies, and its lending to businesses in moderate-income geographies significantly exceeds the percentage of businesses in moderate-income geographies. In addition, its lending market share in both low- and moderate-income areas for this product significantly exceeds its overall lending market share in this AA (for this product). Of note, distribution of small loans to farms is consistent with good performance.

Distribution of Loans by Income Level of Borrower

The borrower distribution of PNB's loans in the Columbus Ohio MSA AA is good. This conclusion is primarily based upon excellent home purchase and home improvement loan distribution records, good home refinance loan and small loans to farms distribution coupled with adequate small business borrower distribution.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income segment of the population in the community. Refer to the Market Profiles in Appendix C for the demographic information, including poverty rates, for the Columbus, Ohio MSA AA.

PNB's lending activity for home purchase and home improvement loans to borrowers of different incomes represents excellent distribution. The distribution of home refinance loans to borrowers of different incomes is good. The percentages of loans to moderate-income borrowers for all three home mortgage loan products significantly exceed the percentage of families in the Columbus, Ohio MSA AA. The percentage of home improvement loans to low-income borrowers also exceeds the percentage of families in the AA. The percentage of home purchase loans to low-income borrowers is near the percentage of families in the Columbus, Ohio MSA AA. The percentage of home refinance loans to low-income borrowers, while lower than the percentage of low-income families in the AA, reflects good performance.

Small Loans to Businesses

The borrower distribution of small loans to businesses is adequate. The percentage of loans to businesses with revenues of \$1 million is less than percentage of small businesses in the AA. Refer to Table 11 in the Columbus, Ohio MSA AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

Refer to Table 12 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to farms. The borrower distribution of small loans to farms is good. The percentage of loans to farms with revenues of \$1 million or less is near to the percentage of small farms in the AA.

Community Development Lending

The bank's record of originating CD loans is excellent in the Columbus, Ohio MSA AA. During the evaluation period, Park originated 21 CD loans totaling \$8.732 million in the area. The CD loans reflect a variety of CD purposes such as small business lending, multi-family housing,

and economic development. While the bank's record of CD lending is significant, it did not impact the Lending Test rating in the Columbus, Ohio MSA AA. Refer to Table 1 Lending Volume of Appendix D for the facts used to evaluate the banks level of community development (CD) lending.

Product Innovation and Flexibility

PNB offers "Welcome Home" loans which assist in funding down payment and closing cost for low- and moderate-income homebuyers. During the evaluation period, PNB originated 14 "Welcome Home" loans totaling \$893 thousand in the Columbus, Ohio MSA AA, by assisting low- and moderate-income borrowers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Ohio Non-MSA AA is weaker (adequate) than the bank's overall high satisfactory performance in the State of Ohio. This weaker performance is attributed to an adequate geographic distribution record for both home mortgage loans and small loans to businesses.

The bank's performance in the Mansfield MSA AA and the Springfield MSA AA is consistent with the bank's overall performance in the state. Performance in the Dayton MSA AA is weaker (adequate) than the bank's overall rating in the State of Ohio. The weaker performance in the Dayton MSA AA is attributed to an adequate geographic distribution record for both home mortgage loans and small loans to businesses.

While performance in these four AAs had an overall neutral impact on the Lending Test for The State of Ohio, performance in the Ohio Non-MSA AA and the Dayton MSA AA did negatively impact the overall conclusions for the geographic distribution record. Because of performance in the Ohio Non-MSA AA and the Dayton MSA AA, the geographic distribution of loans in the State of Ohio is adequate; refer to Tables 1 through 12 of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusion for Area Receiving Full-Scope Reviews

PNB's overall Investment Test performance is rated "Excellent". Based on a full-scope review, performance in the Columbus MSA AA is Outstanding. PNB's responsiveness to the identified investment needs of the assessment area is adequate, especially in the area of affordable housing. The bank's performance in the limited scope AAs (Ohio MSA, Springfield MSA AA, Mansfield MSA AA and Dayton MSA AA) was similar to that of the full-scope AAs.

During the evaluation period, Park originated 57 qualified investments and donations in the Columbus, Ohio MSA AA totaling \$9,797 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA (still outstanding). The remaining balance on seven prior period investments as of December 31, 2009 was \$3.103 million.

The majority of PNB's qualified investments respond to the state's need for affordable housing through low income housing tax credits (LIHTC). The largest qualified investment made in the current period was to the Ohio Capital Corporation for Housing (OCCH) which is an independent, mission-driven nonprofit corporation that works with private and public developers to create affordable housing opportunities.

Refer to Table 14 in the Columbus, Ohio MSA AA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Limited -Scope Reviews

Based on the limited-scope reviews, the bank's performance in the Springfield MSA AA is consistent with the bank's overall outstanding performance in the full-scope review AA. PNB's performance in the Ohio Non-MSA and Mansfield MSA AAs is similar to the bank's overall performance in the full-scope review AA. PNB made 25 qualified investments during the current evaluation period (including qualified prior period investments still outstanding) in the Ohio Non-MSA AA totaling \$7.695 million and 14 qualified investments (current and prior period) in the Mansfield MSA AA totaling \$2.103 million. The bank made another 14 qualified investments (current and prior period) within the Dayton MSA AA totaling \$669 thousand, which is weaker than the overall performance in the full-scope AA. Performance in the Springfield MSA, Ohio Non-MSA and Mansfield MSA AAs has a positive impact on the overall Investment Test rating for the bank.

Refer to Table 14 in the Ohio Non MSA AA, Dayton MSA AA, Mansfield MSA AA, and Dayton MSA AA sections of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Area Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated High-Satisfactory. Based on a full-scope review, the bank's performance in the Columbus MSA AA is Outstanding. The performance in the limited-scope review had a positive impact on the overall Service Test rating.

Retail Banking Services

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

The distribution of bank branches is good for the Columbus MSA AA.

The distribution of bank branches in both low- and moderate-income geographies for the Columbus, Ohio MSA AA is good, as they are reasonably accessible to all portions of the full-scope area. The branch distribution in low- or moderate-income geographies is comparable to the percentage of the population that resides in those geographies. Nine offices, or 26.47% percent of total branches for this AA, are located in low- or moderate-income geographies compared to 30.23 percent of the population living in low- or moderate-income geographies. Park operates only one branch in a low-income geography for this AA; however, only 6.87

percent of the population resides in the low-income geography. The accessibility of bank ATMs to low- and moderate-income geographies is also good (25% of ATMs for this AA are located in low- or moderate income geographies) and the distribution is similar to that of the bank's branches.

During the evaluation period, the bank opened one branch (middle-income geography) in the Columbus, Ohio MSA AA while closing one (upper-income geography). The branch opening and closing had a neutral impact on the accessibility of branches to residents in low- and moderate-income geographies.

The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AAs. Branch hours are reasonable and include extended hours at some locations through the week, with some branches also open for limited hours on Saturday and Sunday.

Community Development Services

PNB's record of providing CD services to the Columbus MSA AA is excellent. The bank's CD services had a positive effect on the bank's Service rating for the Columbus MSA AA. Several of PNB's officers and employees hold leadership positions in various organizations that seek to fulfill identified CD needs. During the evaluation period, bank employees provided services to 19 different organizations that address community needs, including economic revitalization, affordable housing, and services for low- and moderate-income individuals and families. As an example, a bank officer serves as an instructor to an organization that provides financial expertise and assistance in the process of first time home buying to low- or moderate- income households.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Ohio Non-MSA, Dayton MSA, Mansfield MSA, and Springfield MSA AAs had a positive impact on the bank's overall performance under the Service Test. Performance in the Ohio Non-MSA, Dayton MSA, Mansfield MSA, and Springfield MSA AA is stronger than the Columbus, Ohio MSA AA in the full-scope review and is excellent. The percentage of branch distribution for the Ohio Non-MSA, Dayton MSA, and Mansfield AAs in low- and moderate-income geographies is higher than the percentage of population that resides within those geographies. The Ohio Non-MSA AA has 12.77 percent of their branches within low- and moderate-income geographies with only 11 percent of the population residing within. The Dayton MSA AA has 50.00% of their branches within low- and moderate-income geographies with only 26.40% of the population residing within these areas. The Mansfield MSA AA has 30.77% of their branches within low- and moderate-income areas while 20.03% of the population resides within these geographies. The percentage of branch distribution for the Springfield MSA AA in low- and moderate-income areas at 18.18 percent is near the percentage of the population which resides within the AA of 18.55 percent.

CD services provided to the limited-scope review AAs is excellent. During the evaluation period, PNB provided CD services to 20 different organizations in the Ohio Non-MSA AA, four different organizations in the Dayton MSA AA, four different organizations in the Mansfield MSA AA, and six different organizations in the Springfield MSA AA.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/07 to 12/31/09) Investment and Service Tests and CD Loans: (08/28/06 to 12/31/09)	
Financial Institution	Products Reviewed	
The Park National Bank, Newark, Ohio	Home Purchase Home Refinance Home Improvement Small Loans to Businesses Small Loans to Farms Community Development Loans/Investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
(None Reviewed)		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Cincinnati-Middletown OH-KY-IN MSA # 17140 (Partial) ("Multistate AA")	Full-Scope	(Ohio= Butler, Clermont, Hamilton, Warren Counties) (Kentucky = Boone County)
<u>State of Ohio</u> (Columbus Ohio MSA # 18140 ("Columbus, Ohio MSA AA"))	Full –Scope	(Delaware, Fairfield, Franklin, Licking, Madison, Morrow Counties)
Ohio Non-MSA AA ("Ohio Non-MSA AA")	Limited-Scope	(Ashland, Holmes, Knox, Coshocton, Tuscarawas, Muskingum, Perry, Hocking, Athens, Crawford, Marion, Champaign, Fayette, Darke Mercer Counties)
Dayton MSA 19380 ("Dayton MSA AA")	Limited-Scope	(Greene, Miami, Montgomery Counties)
Mansfield MSA 31900 ("Mansfield MSA AA")	Limited Scope	(Richland County)
Springfield MSA 44200 ("Springfield MSA AA")	Limited Scope	(Clark County)

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		The Park National Bank		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
The Park National Bank	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Cincinnati-Middletown OH-KY-IN # 17140	Low Satisfactory	Outstanding	Low Satisfactory	Low Satisfactory
State of Ohio	High Satisfactory	Outstanding	High Satisfactory	High Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

Columbus, Ohio MSA AA

Demographic Information for Full-Scope Area: (Columbus Ohio AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	366	9.56	27.05	38.25	25.14	0.00
Population by Geography	1,519,058	6.87	23.36	41.09	28.68	0.00
Owner-Occupied Housing by Geography	376,873	3.06	18.20	44.74	34.00	0.00
Businesses by Geography	127,312	7.55	18.58	39.26	34.61	0.00
Farms by Geography	3,605	1.53	12.29	59.38	26.80	0.00
Family Distribution by Income Level	389,723	19.50	18.46	22.99	39.05	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	147,944	11.36	34.26	41.28	13.10	0.00
Median Family Income						
HUD Adjusted Median Family Income for 2009	= \$54,708					
Households Below the Poverty Level	= \$68,600					
	= 10%					
			Median Housing Value			= 119,955
			Unemployment Rate (August 2010)			= 9.2 %

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2009 HUD updated MFI.

The Columbus Ohio AA consists of six contiguous counties: Delaware, Fairfield, Franklin, Licking, Madison and Morrow. The AA contains 366 census tracts of which 9.56% are low-income, 27.05% are moderate-income, 38.25% are middle-income and 25.14% are upper-income. The 2009 HUD adjusted median family income for the AA is \$68,600. Approximately 10% of the households in the AA fall below the poverty line. Unemployment is high at 9.2%.

As of June 30, 2009, PNB had \$1.707 billion in deposits in the Columbus Ohio AA which ranked sixth with a 4.74% market share. Competition is strong with 52 banking institutions represented in the market with 529 branches operating in the MSA. The market is somewhat concentrated with five institutions (Huntington, JP Morgan Chase, Fifth Third, PNC, and Nationwide Bank) holding over 70% of the deposits. As of June 30, 2010, PNB operated 34 branches in the AA.

The Columbus AA economy is in a slight recovery mode. Unemployment of 9.2% as of August 2010, is lower than both the statewide average of 10.1% and the national average of 9.6%.

Multistate AA

Demographic Information for Full-Scope Area: Multistate AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	384	11.46	21.35	42.97	23.18	1.04
Population by Geography	1,600,461	6.97	17.93	45.54	29.44	0.11
Owner-Occupied Housing by Geography	412,156	2.36	14.41	49.13	34.09	0.00
Businesses by Geography	116,624	5.37	17.26	44.68	31.76	0.94
Farms by Geography	2,916	1.47	12.00	55.21	31.21	0.10
Family Distribution by Income Level	418,323	18.71	17.93	22.68	40.69	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	153,252	11.78	26.58	46.34	15.29	0.00
Median Family Income HUD Adjusted Median Family Income for 2099 Households Below the Poverty Level	= \$54,771 = \$69,200 = 10%	Median Housing Value Unemployment Rate (July 2010)				= \$120,790 = 9.8%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2009 HUD updated MFI.

The multistate AA consists of Butler, Clermont, Hamilton and Warren Counties in Ohio and Boone County in Kentucky. The AA contains 384 census tracts of which 11.46% are low-income, 21.35% are moderate-income, 42.97% are middle-income and 23.18% are upper-income. The 2009 HUD adjusted median family income for the AA is \$54,771. Approximately 10% of the household fall below the poverty level. Unemployment is high at 9.8%. Job creation is a major need for the AA.

As of June 30, 2009, PNB had \$226 million in deposits in the multistate AA, which ranked nineteenth with a .47% market share. Banking competition is strong with 67 FDIC insured institutions in the market with 661 branches operating in the AA. The market is fairly competitive with two institutions (Fifth Third and U.S. Bank) holding 64% of the areas deposits. Presently PNB operates 12 branches in the AA.

The Cincinnati economy is in the midst of a modest recovery. Unemployment of 9.8% is slightly lower than the state average of 10.1%. Weaknesses remain in public and retail sectors. Prospects for growth in the short-term are muted; however, there is optimism for modest and stable growth of the medium-term.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- 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 assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. 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 MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: THE PARK NATIONAL BANK						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009				
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Columbus, Ohio MSA AA	35.44	3,912	471,971	2,927	441,209	208	17,907	21	8,732	7,068	939,819	38.48
Multistate AA	5.43	604	89,475	466	99,734	9	1,303	2	2,611	1,081	193,123	5.09
Limited Review:												
Ohio Non-MSA AA	37.11	3,712	398,437	2,724	295,313	945	74,455	10	6,820	7,391	775,025	33.09
Dayton MSA AA	6.84	608	66,842	644	103,216	108	7,906	5	7,727	1,365	185,691	5.21
Mansfield MSA AA	7.16	567	51,989	817	83,828	39	2,327	4	486	1,427	138,630	10.02
Springfield MSA AA	8.03	493	32,415	900	128,285	204	21,857	1	36	1,598	182,593	8.11

* Loan Data as of December 31, 2009. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from August 28, 2006 to December 31, 2009.

*** Deposit Data as of September 16, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: THE PARK NATIONAL BANK				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Columbus, Ohio MSA AA	1,050	39.12	3.06	0.48	18.20	28.95	44.74	50.19	34.00	20.38	1.34	0.34	3.13	1.59	0.60	
Multistate AA	201	7.49	2.36	1.49	14.41	12.94	49.13	57.21	34.09	28.36	0.29	0.00	0.32	0.36	0.21	
Limited Review:																
Ohio Non-MSA AA	1,009	37.59	0.03	0.10	9.45	6.54	78.61	83.94	11.90	9.42	5.37	0.00	2.83	6.03	2.68	
Dayton MSA AA	138	5.14	2.03	0.00	18.03	28.99	48.40	45.65	31.54	25.36	0.45	0.00	1.00	0.42	0.32	
Mansfield MSA AA	149	5.55	0.16	0.00	14.17	12.08	58.08	59.06	27.58	28.86	6.10	0.00	6.03	6.28	5.83	
Springfield MSA AA	137	5.10	1.73	0.00	9.72	10.22	59.32	72.26	29.23	17.52	4.45	0.00	7.00	5.49	1.31	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: THE PARK NATIONAL BANK						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009						
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography.*				
	#	% of Total* *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Columbus, Ohio MSA AA	308	37.52	3.06	0.00	18.20	33.77	44.74	55.84	34.00	10.39	3.86	0.00	7.22	4.59	1.52
Multistate AA	25	3.05	2.36	0.00	14.41	16.00	49.13	60.00	34.09	24.00	0.52	0.00	0.28	0.78	0.29
Limited Review:															
Ohio Non-MSA AA	274	33.37	0.03	0.00	9.45	2.19	78.61	89.78	11.90	8.03	12.49	0.00	3.41	14.52	4.96
Dayton MSA AA	29	3.53	2.03	0.00	18.03	13.79	48.40	68.97	31.54	17.24	1.28	0.00	1.47	1.72	0.64
Mansfield MSA AA	65	7.92	0.16	1.54	14.17	21.54	58.08	58.46	27.58	18.46	13.22	100.00	25.00	11.49	10.71
Springfield MSA AA	120	14.62	1.73	1.67	9.72	9.17	59.32	69.17	29.23	20.00	21.38	25.00	25.00	24.72	14.42

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: THE PARK NATIONAL BANK								Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography.*				
	#	% of Total.*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Columbus, Ohio MSA AA	2,541	40.07	3.06	0.39	18.20	21.49	44.74	55.45	34.00	22.67	2.25	0.30	3.73	3.10	1.12
Multistate AA	362	5.71	2.36	0.55	14.41	8.84	49.13	59.94	34.09	30.66	0.29	0.25	0.24	0.36	0.23
Limited Review:															
Ohio Non-MSA AA	2,415	38.09	0.03	0.08	9.45	3.02	78.61	84.80	11.90	12.09	5.46	0.00	0.75	6.21	3.48
Dayton MSA AA	439	6.92	2.03	0.00	18.03	15.03	48.40	54.21	31.54	30.75	0.76	0.00	1.10	0.99	0.39
Mansfield MSA AA	349	5.50	0.16	0.00	14.17	2.87	58.08	58.45	27.58	38.68	6.65	0.00	3.48	6.24	8.23
Springfield MSA AA	235	3.71	1.73	0.43	9.72	5.53	59.32	65.96	29.23	28.09	4.70	5.56	3.45	5.41	3.78

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: THE PARK NATIONAL BANK						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography.*				
	#	% of Total.**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Columbus, Ohio MSA AA	13	26.00	12.40	7.69	31.92	46.15	34.63	38.46	21.05	7.69	1.91	1.67	3.92	1.52	0.00
Multistate AA	16	32.00	18.02	12.50	23.69	18.75	40.90	50.00	17.39	18.75	2.76	0.00	0.00	4.55	5.56
Limited Review:															
Ohio Non-MSA AA	14	28.00	4.39	7.14	18.30	0.00	62.11	71.43	15.20	21.43	17.14	0.00	0.00	23.81	33.33
Dayton MSA AA	2	4.00	8.65	0.00	21.65	50.00	48.43	0.00	21.28	50.00	3.70	0.00	7.69	0.00	14.29
Mansfield MSA AA	4	8.00	1.06	0.00	25.75	25.00	53.27	50.00	19.92	25.00	37.50	0.00	100.00	33.33	25.00
Springfield MSA AA	1	2.00	4.16	0.00	21.72	0.00	70.62	100.00	3.49	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: THE PARK NATIONAL BANK						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography.*				
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Columbus, Ohio MSA AA	2,927	34.52	7.55	7.28	18.58	29.38	39.26	43.59	34.61	19.75	2.21	3.53	4.19	2.76	1.01
Multistate AA	466	5.50	5.37	3.00	17.26	17.38	44.68	51.72	32.69	27.90	0.37	0.22	0.43	0.47	0.26
Limited Review:															
Ohio Non-MSA AA	2,724	32.13	0.28	0.22	11.54	6.20	77.01	82.42	11.17	11.16	8.73	13.95	6.83	9.67	7.40
Dayton MSA AA	644	7.60	6.67	2.64	19.96	23.91	42.44	57.30	30.93	16.15	1.67	0.79	2.20	2.48	0.69
Mansfield MSA AA	817	9.64	3.53	12.97	19.18	17.63	52.14	43.94	25.15	25.46	14.73	31.85	18.41	13.79	12.84
Springfield MSA AA	900	10.62	2.65	3.11	17.53	16.78	54.85	47.11	24.98	33.00	17.56	27.12	19.10	16.07	19.05

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: THE PARK NATIONAL BANK						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009						
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography.*				
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Columbus, Ohio MSA AA	208	13.75	1.53	0.00	12.29	21.15	59.39	72.60	26.80	6.25	19.62	0.00	35.00	20.24	7.79
Multistate AA	9	0.59	1.47	0.00	12.00	0.00	55.21	66.67	31.32	33.33	1.19	0.00	0.00	0.66	2.50
Limited Review:															
Ohio Non-MSA AA	945	62.46	0.02	0.00	2.66	0.42	82.15	78.41	15.17	21.16	44.75	0.00	0.00	42.95	62.79
Dayton MSA AA	108	7.14	0.97	0.00	9.75	11.11	64.70	84.26	24.58	4.63	21.48	0.00	63.64	22.06	8.11
Mansfield MSA AA	39	2.58	0.25	0.00	4.31	0.00	70.81	76.92	24.62	23.08	38.00	0.00	0.00	39.47	40.00
Springfield MSA AA	204	13.48	0.68	0.00	3.17	0.00	48.53	42.65	47.62	57.35	55.17	0.00	0.00	53.49	59.52

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: THE PARK NATIONAL BANK								Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					
Assessment Area:	Total Home Purchase 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 Review:															
Columbus, Ohio MSA AA	1,050	39.12	19.50	18.43	18.46	27.39	22.99	26.57	39.05	27.60	1.42	2.65	1.39	1.49	1.09
Multistate AA	201	7.49	18.71	13.47	17.93	36.27	22.68	20.21	40.69	30.05	0.32	0.42	0.52	0.27	0.20
Limited Review:															
Ohio Non-MSA AA	1,009	37.59	17.64	12.81	19.46	26.34	24.79	26.55	38.10	34.30	6.11	7.47	5.16	5.58	6.93
Dayton MSA AA	138	5.14	19.26	15.50	18.66	37.98	22.62	15.50	39.46	31.01	0.52	0.83	0.75	0.21	0.48
Mansfield MSA AA	149	5.55	17.95	12.68	19.32	26.06	23.37	26.06	39.36	35.21	6.74	9.26	5.30	6.04	7.63
Springfield MSA AA	137	5.10	18.75	17.69	18.55	29.23	24.25	23.08	38.44	30.00	4.81	6.17	4.21	4.37	5.20

* Based on 2008 Peer Mortgage Data (Eastern)

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 5.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: THE PARK NATIONAL BANK						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009						
Assessment Area:	Total Home Improvement 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 Review:															
Columbus, Ohio MSA AA	308	37.52	19.50	20.21	18.46	26.95	22.99	26.24	39.05	26.60	3.64	6.01	5.40	3.57	2.24
Multistate AA	25	3.05	18.71	20.83	17.93	25.00	22.68	12.50	40.69	41.67	0.54	1.30	0.72	0.13	0.51
Limited Review:															
Ohio Non-MSA AA	274	33.37	17.64	9.51	19.46	27.38	24.79	25.10	38.10	38.02	12.52	12.50	15.56	12.09	11.17
Dayton MSA AA	29	3.53	19.26	17.86	18.66	32.14	22.62	25.00	39.46	25.00	1.24	2.00	1.89	1.24	0.72
Mansfield MSA AA	65	7.92	17.95	19.35	19.32	24.19	23.37	22.58	39.36	33.87	12.63	16.67	14.29	11.69	11.48
Springfield MSA AA	120	14.62	18.75	19.13	18.55	27.83	24.25	24.35	38.44	28.70	21.04	35.71	19.32	19.72	17.59

* Based on 2008 Peer Mortgage Data (Eastern)

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 5.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: THE PARK NATIONAL BANK						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009						
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 Review:															
Columbus, Ohio MSA AA	2,541	40.07	19.50	11.93	18.46	22.51	22.99	25.39	39.05	40.17	2.46	3.62	2.97	2.40	2.10
Multistate AA	362	5.71	18.71	11.93	17.93	18.75	22.68	23.01	40.69	46.31	0.34	0.54	0.28	0.20	0.41
Limited Review:															
Dayton MSA AA	2,415	38.09	17.64	6.59	19.46	18.71	24.79	26.21	38.10	48.50	5.82	7.59	5.36	4.69	6.52
Mansfield MSA AA	439	6.92	19.26	10.10	18.66	22.17	22.62	22.91	39.46	44.83	0.77	1.26	0.81	0.76	0.68
Springfield MSA AA	349	5.50	17.95	7.49	19.32	24.85	23.37	25.45	39.36	42.22	7.00	15.66	7.24	4.29	7.41
Dayton MSA AA	235	3.71	18.75	15.21	18.55	18.89	24.25	29.03	38.44	36.87	5.13	12.31	5.57	3.62	4.49

* Based on 2008 Peer Mortgage Data (Eastern)

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.1% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: THE PARK NATIONAL BANK			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share.*	
	#	% of Total **	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Columbus, OH MSA AA	2,927	34.52	75.11	60.81	63.03	19.92	17.05	2.21	4.69
Multistate AA	466	5.50	73.43	61.80	47.00	23.61	29.40	0.37	0.71
Limited Review:									
Ohio Non-MSA AA	2,724	32.13	77.09	66.19	75.00	14.35	10.65	8.73	16.71
Dayton MSA AA	644	7.60	75.29	63.20	60.40	21.27	18.32	1.67	3.68
Mansfield MSA AA	817	9.64	74.65	53.12	74.91	15.30	9.79	14.73	21.82
Springfield MSA AA	900	10.62	76.56	67.89	66.00	17.67	16.33	17.56	31.74

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.33% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: THE PARK NATIONAL BANK			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total **	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Columbus, Ohio MSA AA	208	13.75	97.12	92.79	77.88	13.46	8.65	19.62	26.44
Multistate AA	9	0.59	97.19	100.00	66.67	11.11	22.22	1.19	1.59
Limited Review:									
Ohio Non-MSA AA	945	62.46	98.81	93.44	77.25	16.61	6.14	44.75	48.55
Dayton MSA AA	108	7.14	97.94	95.37	80.56	14.81	4.63	21.48	23.50
Mansfield MSA AA	39	2.58	98.98	89.74	92.31	2.56	5.13	38.00	41.03
Springfield MSA AA	204	13.48	97.28	92.16	72.55	18.14	9.31	55.17	56.05

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2009).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 2.64% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: THE PARK NATIONAL BANK				Evaluation Period: JUNE 30, 2006 TO DECEMBER 31, 2009			
Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Columbus, Ohio MSA AA	7	\$3,103	57	\$9,797	64	\$12,900	44.91%	0	0
Multistate AA	7	\$556	7	\$1,910	14	\$2,446	8.52%	0	0
Limited Review:									
Ohio Non-MSA AA	7	\$2,735	18	\$4,960	25	\$7,695	26.79%	0	0
Dayton MSA AA	7	\$231	7	\$438	14	\$669	2.33%	0	0
Mansfield MSA AA	7	\$786	7	\$1,317	14	\$2,103	7.32%	0	0
Springfield MSA AA	7	\$1,137	10	\$1,771	17	\$2,908	10.13%	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: THE PARK NATIONAL BANK						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Bran- ches	% of Rated Area Branch- es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Columbus, Ohio MSA AA	38.48	34	26.77	2.94	23.53	47.06	26.47	1	1	0	0	+1	-1	6.87	23.36	41.09	28.68
Multistate AA	5.09	12	9.45	0.00	16.67	58.33	25.00	2	2	0	+1	-1	0	6.97	17.93	45.54	29.44
Limited Review:																	
Ohio Non-MSA AA	33.09	47	37.01	0.00	12.77	70.21	17.02	0	2	0	0	-1	-1	0.37	10.67	77.73	11.24
Dayton MSA AA	5.21	10	7.87	0.00	50.00	50.00	0.00	0	2	0	0	-1	-1	3.49	22.91	46.40	27.20
Mansfield MSA AA	10.02	13	10.24	0.00	30.77	53.85	15.38	0	-1	0	0	-1	0	2.08	17.95	56.06	23.91
Springfield MSA AA	8.11	11	8.66	9.09	9.09	72.73	9.09	0	0	0	0	0	0	3.37	15.18	57.07	24.38

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: THE PARK NATIONAL BANK																	
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Columbus, Ohio MSA AA	38.48	34	26.77	2.94	23.53	47.06	26.47	40	27.40	1	9	20	10	6.87	23.36	41.09	28.68
Multistate AA	5.09	12	9.45	0	16.67	58.33	25.00	9	6.16	0	1	6	2	6.97	17.93	45.54	29.44
Limited Review:																	
Ohio Non-MSA AA	33.09	47	37.01	0	12.77	70.21	17.02	56	38.36	0	4	44	8	0.37	10.67	77.73	11.24
Dayton MSA AA	5.21	10	7.87	0.00	50.00	50.00	0.00	10	6.85	0	4	5	1	3.49	22.91	46.40	46.40
Mansfield MSA AA	10.02	13	10.24	0.00	30.77	53.85	15.38	15	10.27	0	4	8	3	2.08	17.95	56.06	56.06
Springfield MSA AA	8.11	11	8.66	9.09	9.09	72.73	9.09	16	10.96	1	2	11	2	3.37	15.18	57.07	57.07