

LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

November 15, 2004

Community Reinvestment Act Performance Evaluation

The National Bank & Trust Company
Charter Number: 1997

48 North South Street
Wilmington, Ohio 45177

Office of the Comptroller of the Currency

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

Description of Institution

The National Bank and Trust Company (NBT) is an independent intrastate community bank headquartered in Wilmington, Ohio, which is located 50 miles northeast of Cincinnati, Ohio. As of September 30, 2004, NBT reported total assets of \$644 million and Tier 1 capital of \$55 million or 8.41% of total assets. NBT has 19 offices that serve six counties in southwest Ohio and one county in northwest Ohio.

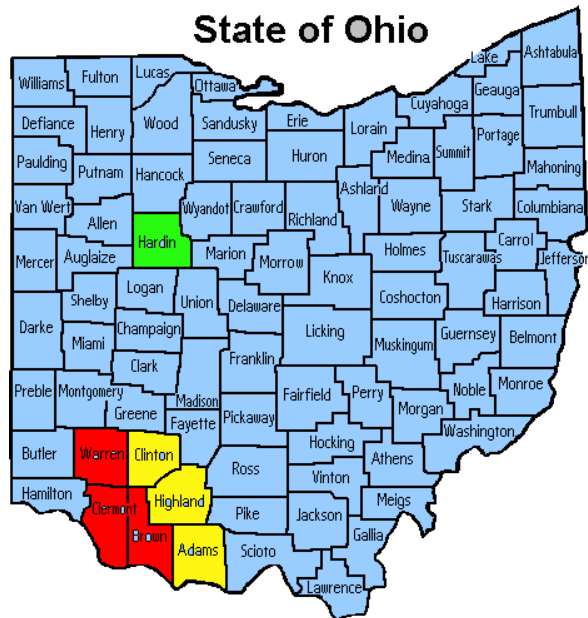
NBT is a wholly owned subsidiary of NB&T Financial Group, Inc., a one-bank holding company also located in Wilmington. NB&T Insurance Agency, Inc., located in Wilmington, Ohio, is an operating subsidiary of the bank. The results of our review did not indicate that the activities of the bank's subsidiary materially impact the bank's capacity and ability to lend or invest in its community. Therefore, the activities of NB&T Insurance Agency, Inc. were not included in our assessment of NBT's CRA performance.

NBT offers a full range of consumer, commercial loan, and deposit products, as well as trust services. As of September 30, 2004, the bank's loan portfolio totaled \$409 million. The bank's primary business lines are real estate lending (53% of the portfolio), commercial lending (22% of the portfolio), and consumer lending (21% of the portfolio). NBT's market area is comprised largely of rural markets. Competition for loans and deposits within the assessment areas (AAs) is strong.

There are no legal, financial or other factors impeding NBT's ability to meet the credit needs of its AA. The bank's last CRA examination was conducted March 26, 2001, and resulted in a "Satisfactory" rating. The bank's two AAs comply with the requirements of the regulation. Please refer to page 2 for a description of the AA and to the bank's CRA Public File for additional information.

Description of the AAs

For purposes of this examination, the bank's activities are reviewed by AA. NBT has two AAs. The AAs meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income geographies. For additional information on NBT's AAs, please see the Market Profile demographic information tables in Appendix A.



Wilmington non-MSA AA

The Wilmington non-MSA AA is comprised on Clinton County, Highland County, and Adams County in southwest Ohio. There are no low-income geographies in the AA. This AA is depicted in yellow on the map of Ohio.

- Clinton County is the home county for the bank, and this is where they have the greatest market concentration. The bank has a 40% deposit market share and the greatest concentration of NBT's loans is in this county. Clinton County is made up of one upper-income and eight middle-income census tracts. All of the bank's Clinton County branches and stand-alone ATMs are in the middle-income tracts.
- Highland County is southeast of Clinton County and is comprised of eight middle-income census tracts and one moderate-income census tract. NBT's Highland County branch and two stand-alone ATMs are in one of the middle-income tracts, and they are easily accessible by persons living in the moderate-income tract.
- Adams County is southeast of Highland County and is comprised of two middle-income census tracts and four moderate-income census tracts. The only branch in this county is in a Wal-Mart store located in a moderate-income tract. The

level of lending activity produced by this Wal-Mart branch is minimal, as the customers of this branch tend to primarily use deposit and check-cashing services. As such, there is little lending market penetration in Adams County. Therefore, the lending in moderate-income tracts, described later in this analysis, will be distorted, as four of the five moderate-income geographies in the AA are in a county where the bank has little market share.

Cincinnati MSA AA

The Cincinnati MSA AA is comprised of Clermont County, Warren County, and Brown County in southeast Ohio. All are adjacent to Clinton County. There are no low-income geographies in this AA. This AA is depicted in red on the map of Ohio.

- Clermont County is southwest of Clinton County and is comprised of five upper-income, 25 middle-income, and three moderate-income census tracts. While all four branch offices and all eight stand-alone ATMs are in middle- or upper-income census tracts, there are offices and ATMs located near the three moderate-income census tracts.
- Warren County is north of Clermont County and is comprised of 13 upper-income, 17 middle-income, and one moderate-income census tract. One branch is located in an upper-income census tract and one branch is located in a middle-income census tract. The sole stand-alone ATM is in an upper-income census tract. The one moderate-income census tract is not located near any branch office or ATM; however, this census tract is well served by other banks that have offices in this area.
- Brown County is east of Clermont County and south of Clinton County. It is comprised of three middle-income and five moderate-income census tracts. Two of the three branches are in moderate-income tracts and the third branch is located near two moderate-income tracts.

Other Information

The bank also has one branch in Hardin County, which is located in northwest Ohio. Hardin County is depicted in green on the map of Ohio. The Hardin County branch has a low market share and only a small portion of NBT's loans is made in this county. For purposes of this review, it was not considered as part of either AA.

Evaluation Period

The evaluation period for this Community Reinvestment Act (CRA) examination is from the date of the prior CRA exam to the beginning date of this CRA exam. The last CRA exam was dated March 26, 2001, and the current review began on November 15, 2004. With the exception of the community development (CD) loans, the primary data evaluation for the Lending Test is from January 1, 2001 to December 31, 2003. The evaluation period for the Investment Test, Service Test, and Community Development loans is March 26, 2001 to November 15, 2004.

For the Lending Test, NBT's originations of home mortgage loans, home improvement loans, as well as small loans to businesses and farms were evaluated.

For each AA, we conducted two separate analyses, based upon the availability of census data. The 1990 census data was used to analyze performance in 2001 and 2002. The 2000 census data is used to analyze performance in 2003.

Overall CRA Rating

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

The following table indicates the performance level of The National Bank & Trust Company with respect to the lending, investment, and service tests:

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

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

Due to NBT’s business focus, we gave the greatest weight to home mortgage loans, followed by small business loans. Within home mortgage loans, home purchase and home refinance loans were weighted more heavily than home improvement loans. This weighting is reflective of NBT’s loan volume by product type over the evaluation period.

The local economy is stable. Clinton County is among the strongest economies in the state. Unemployment stood at 4.9% compared to the statewide rate of 5.8% and the national rate of 5.1%, as of October 2004. Other counties in the bank’s AAs have higher unemployment rates. Adams County and Brown County have unemployment rates of 9.2% and 6.9%, respectively. The two community contacts made during this examination revealed that NBT is meeting the credit needs of the community and are actively involved in Community Development services, benefiting low- and moderate-income individuals.

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

LENDING

Refer to Tables 1 through 11a in Appendix B for facts and data used to evaluate the bank’s lending.

Conclusions for Areas Receiving Full-Scope Reviews

Overall performance under the lending test is rated “High Satisfactory.” Performance in the Wilmington Non-MSA AA lending performance is adequate and performance in the

Cincinnati MSA AA is excellent. Over 91% of the bank's home loans and small loans to businesses and farms are within the AAs. The bank's deposit market share is 13.58% in the Wilmington non-MSA AA and 4.4% in the Cincinnati MSA AA. This is near the bank's HMDA loan market share and lower than its small farm and small business loan market share figures.

DISTRIBUTION OF LOANS BY INCOME LEVEL OF THE GEOGRAPHY

The distribution of loans by income level of the geography is adequate in the Wilmington non-MSA AA and excellent in the Cincinnati MSA AA. Home purchase, home improvement, and home refinance loans to borrowers living in moderate-income tracts are below the percentage of owner-occupied units in the Wilmington non-MSA AA and well above the percentage of owner-occupied units in the Cincinnati MSA AA. The principal reason for this disparity is that four of the five moderate-income census tracts in the Wilmington non-MSA AA are in Adams County, where NBT has a very small presence in terms of branches and market share. The sole Adams County branch is located in a Wal-Mart store, in a moderate-income census tract.

Wilmington non-MSA AA

There are no low-income geographies in this AA. NBT's lending performance in moderate-income tracts is adversely impacted by the location of the bank's branch offices in the Wilmington non-MSA AA.

- NBT's geographic distribution of home purchase, home improvement, and home refinance loans in moderate-income areas for 2001-2002 is significantly less than the percentage of owner-occupied units in this AA.
- NBT's distribution of home purchase loans for 2003, reflects much better performance, being only slightly below the percentage of owner-occupied units in this AA. NBT did not make any home improvement loans in any moderate-income tracts in 2003. NBT's percentage of home mortgage refinance loans that originated during 2003 is also below the percentage of owner-occupied units in this AA.
- NBT's geographic distribution of small loans to businesses and small farms made in moderate-income geographies in 2001-2002 is less than the percentage of businesses and farms in this AA.
- The geographic distribution of small loans to businesses and small farms made in moderate-income geographies in 2003 was also below the percentage of businesses and farms in this AA.

Cincinnati MSA AA

There are no low-income geographies in the Cincinnati MSA AA. The distribution of loans throughout the moderate-income geographies in the Cincinnati MSA AA is excellent.

- NBT's geographic distribution of home purchase, home improvement, and home refinance loans in moderate-income areas for 2001-2002 is excellent. The percentage of loans in moderate-income census tracts is more than twice the percentage of owner-occupied units in this AA.
- NBT's geographic distribution of home purchase, home improvement, and home refinance loans for 2003 also reflects very good performance relative to the percentage of owner-occupied units in this AA.
- NBT's geographic distribution of small loans to businesses and small farms made in moderate-income geographies in 2001-2002 exceeds the percentage of businesses and farms in these tracts in this AA.
- NBT's geographic distribution of small loans to businesses and small farms made in moderate-income geographies in 2003 also exceeds the percentage of businesses and farms in these tracts in this AA.

DISTRIBUTION OF LOANS BY INCOME LEVEL OF THE BORROWER

The distribution of loans by income level of the borrower is very good in the Wilmington non-MSA AA and excellent in the Cincinnati MSA AA. The overall conclusion regarding the bank's distribution of loans by income level of the borrower is that NBT has a highly satisfactory distribution among low- and moderate-income level borrowers. While the penetration of loans to low-income borrowers sometimes lags the percentage of low-income borrowers within the AAs, 18% of all households in the Wilmington non-MSA AA and 7% of all households in the Cincinnati MSA AA are below the poverty level. The penetration of loans to moderate-income borrowers generally exceeds the percentage of moderate-income borrowers in the AAs.

Wilmington non-MSA AA

- NBT's percentage of home purchase loans in 2001-2002 to low-income individuals was less than the percent of low-income families in the AA. However, the percent of loans made to moderate-income individuals exceeded the percent of families in the AA. The bank's percentage of home purchase loans in 2003 remained less than the percent of low-income families in the AA, but the percentage has improved over the numbers noted in the 2001-2002 period. The percentage of loans made to moderate-income individuals in 2003 is near the percentage of families in the AA.

- NBT's percentage of home improvement loans to low-income individuals in 2001-2002 was less than the percentage of low-income families in the AA. However, the percentage of home improvement loans to moderate-income individuals exceeded the percent of families in the AA. NBT's percentage of home improvement loans in 2003 to low-income individuals vastly exceeded the percentage of low-income families in the AA. However, the percentage of loans to moderate-income borrowers was less than the percentage of families in the AA.
- NBT's percentage of home mortgage refinance loans in 2001-2002 to low-income individuals was less than the percent of low-income families in the AA. However, the percentage of loans to moderate-income individuals slightly exceeded the percent of families in the AA. In 2003, the percentage of home mortgage refinance loans to low-income individuals was very low relative to the percentage of low-income families in the AA. The percentage of loans to moderate-income individuals was slightly below the percentage of moderate-income families in the AA.
- In both 2001-2002 and 2003, the percentage of NBT's business loans to companies that have less than \$1 million in annual revenues greatly exceeds the percentage of businesses in the AA that have annual revenues of less than \$1 million.
- In both 2001-2002 and 2003, the percentage of NBT's farm loans to farms with less than \$1 million in annual revenues exceeds the percentage of farms in the AA that have annual revenues of less than \$1 million.

Cincinnati MSA AA

- NBT's percentage of home purchase loans in 2001-2002 to low-income individuals exceeded the percentage of low-income families in the AA. The percentage of loans made to moderate-income individuals vastly exceeded the percent of families in the AA. The bank's percentage of home purchase loans in 2003 exceeded the percentage of low-income families in the AA. The percentage of loans made to moderate-income individuals in 2003 greatly exceeded the percentage of families in the AA.
- NBT's percentage of home improvement loans to low-income individuals in 2001-2002 greatly exceeded the percentage of low-income families in the AA. In addition, the percentage of home improvement loans to moderate-income individuals also greatly exceeded the percent of families in the AA. NBT's percentage of home improvement loans in 2003 to low-income individuals was nearly four times the percentage of low-income families in the AA, constituting very strong performance. The percentage of loans to moderate-income borrowers was also greater than the percentage of families in the AA.

- NBT's percentage of home mortgage refinance loans in 2001-2002 to low-income individuals was near the percentage of low-income families in the AA. However, the percentage of loans to moderate-income individuals exceeded the percent of families in the AA. In 2003, the percentage of home mortgage refinance loans to low-income individuals was near the percentage of low-income families in the AA. The percentage of loans to moderate-income individuals exceeded the percentage of moderate-income families in the AA.
- In both 2001-2002 and 2003, the percentage of NBT's business loans to companies that have less than \$1 million in annual revenues greatly exceeds the percentage of businesses in the AA that have annual revenues of less than \$1 million.
- In both the 2001-2002 and 2003 periods, the percentage of NBT's farm loans to farms with less than \$1 million in annual revenues exceeds the percentage of farms in the AA that have annual revenues of less than \$1 million.

INVESTMENTS

In evaluating the bank's volume of investments, we considered community development opportunities in the AA, as well as the capacity for the local infrastructure to create qualified investments. Neither of the bank's two AAs contains any low-income census tracts. The Wilmington Non-MSA AA contains five moderate-income census tracts and the Cincinnati MSA AA contains nine moderate-income census tracts.

Performance under the investment test is rated "Low Satisfactory." Performance in both the Wilmington non-MSA AA and the Cincinnati MSA AA is adequate. Please refer to Table 12 in Appendix B for facts and data used to evaluate the bank's level of qualified investments.

Wilmington non-MSA AA

- The volume of NBT's investments in the Wilmington non-MSA AA is adequate. All qualified investments in this AA are in the form of grants, with none considered innovative or complex. During the evaluation period, NBT provided 54 grants totaling \$57 thousand to 30 community organizations within the Wilmington non-MSA AA. Investments primarily addressed the social service needs of low- and moderate-income individuals. NBT's investments are commensurate with the level of opportunities available in the AA.

Cincinnati MSA AA

- The volume of NBT's investments in the Cincinnati MSA AA is adequate. All qualified investments in this AA are in the form of grants, with none considered innovative or complex. During the evaluation period, NBT provided 40 grants totaling \$50 thousand to 25 community organizations for community development

purposes within the Cincinnati MSA AA. Investments primarily addressed the social service needs of low- and moderate-income individuals, with some funds supporting affordable housing programs. NBT's investments are adequately commensurate with the level of opportunities available in the AA.

SERVICES

NBT's performance under the Service Test is rated "High Satisfactory." Performance in the Wilmington non-MSA AA is adequate. Performance in the Cincinnati MSA AA is very good. Please refer to Table 13 for facts and data used to evaluate the distribution of the branch delivery system and branch openings and closings.

- NBT's delivery systems are readily accessible to geographies and individuals of different income levels throughout the AAs.
- NBT has three of its 18 branches in the AAs in moderate-income census tracts. Two of these are in the Cincinnati MSA AA and one is in the Wilmington non-MSA AA. There are no low-income census tracts in either AA.
- All branches are full-service and they offer a full array of traditional banking services. The hours offered are traditional during the week with many branches being open on Saturday mornings. Office hours and services offered in all branches are comparable among all locations, regardless of the income level of the geography.
- During the assessment period, NBT opened one branch in the Wilmington non-MSA AA, in a middle-income census tract.
- In the Cincinnati MSA AA, NBT opened one branch and closed another during the assessment period. Both of these branches were in moderate-income areas. The accounts at the closed branch were transferred to another NBT branch located less than one mile away from the closed branch. The branch that received the customers from the closed branch is also located in a moderate-income census tract. The closure of the branch is deemed to not have a significant impact on the affected depositors given the proximity of the remaining branch in that community.
- Since 2001, NBT also closed one branch and opened, then subsequently closed, a second branch, neither of which is in either AA being analyzed in this review. Both branches were located in middle-income census tracts.
- The bank offers free checking accounts in both AAs, with a very low minimum balance requirement of \$25.
- Alternative delivery systems include ATMs, a 24-hour telephone banking service, and Internet Banking. There are four ATMs in moderate-income geographies in

the AAs (one in the Wilmington non-MSA AA and three in the Cincinnati MSA AA) that deliver retail banking services in moderate-income geographies.

NBT's performance in providing community development services in the AAs is good.

- In 2003, bank employees devoted a total of 5,670 hours to community development services. This averages to 22 hours per year per full-time employee. This is an increase over the 5,448 hours and 20 hours per year per full-time employee devoted in 2002.
- Through the first nine months of 2004, the bank devoted 3,766 hours to community development services. This averaged to 20 hours per year per full-time employee.
- These community development services include first time homebuyer programs, various financial literacy and education seminars, Habitat for Humanity projects, visits to local high schools about money management and careers in banking, United Way fund drives, etc. These services predominately serve low- and moderate-income individuals and families.

Fair Lending Review

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

APPENDIX A: Market Profiles for Full-Scope Areas

Wilmington non-MSA AA - 1990 Census Data

Demographic Information for Full Scope Area: Wilmington non-MSA AA – 1990 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	34	0.00	29.41	70.59	0.00	0.00
Population by Geography	137,894	0.00	28.93	71.07	0.00	0.00
Owner-Occupied Housing by Geography	35,267	0.00	29.03	70.97	0.00	0.00
Business by Geography	6,913	0.00	27.40	72.60	0.00	0.00
Farms by Geography	1,488	0.00	20.23	79.77	0.00	0.00
Family Distribution by Income Level	38,058	25.19	18.88	24.10	31.83	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	16,771	0.00	36.97	63.03	0.00	0.00
Median Family Income		30,562	Median Housing Value		50,708	
HUD Adjusted Median Family Income for 2002		48,700	Unemployment Rate (1990 US Census)		3.39%	
Households Below Poverty Level		13.59%				

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

Source: 1990 US Census and 2002 HUD updated Median Family Income (MFI)

Wilmington non-MSA AA - 2000 Census Data

Demographic Information for Full Scope Area: Wilmington non-MSA AA – 2000 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	24	0.00	25.00	70.83	4.17	0.00
Population by Geography	108,748	0.00	22.55	73.03	4.42	0.00
Owner-Occupied Housing by Geography	30,113	0.00	22.87	72.50	4.63	0.00
Business by Geography	5,133	0.00	25.05	70.33	4.62	0.00
Farms by Geography	1,027	0.00	14.41	78.09	7.50	0.00
Family Distribution by Income Level	30,171	20.98	19.77	23.62	35.63	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,294	0.00	30.60	66.54	2.86	0.00
Median Family Income		44,739	Median Housing Value		86,300	
HUD Adjusted Median Family Income for 2003		50,600	Unemployment Rate (1990 US Census)		2.43%	
Households Below Poverty Level		10.86%				

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

Source: 2000 US Census and 2003 HUD updated MFI

Cincinnati MSA AA – 1990 Census Data

Demographic Information for Full Scope Area: Cincinnati MSA AA – 1990 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	51	0.00	23.53	56.86	17.65	1.96
Population by Geography	258,208	0.00	21.11	60.31	17.45	1.13
Owner-Occupied Housing by Geography	65,889	0.00	20.71	60.41	18.88	0.00
Business by Geography	13,878	0.00	18.51	59.02	22.45	0.02
Farms by Geography	1,046	0.00	41.49	52.58	5.93	0.00
Family Distribution by Income Level	71,405	17.69	19.04	25.47	37.80	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	26,231	0.00	30.83	59.97	9.20	0.00
Median Family Income		36,658	Median Housing Value		69,849	
HUD Adjusted Median Family Income for 2002		64,300	Unemployment Rate (1990 US Census)		2.58%	
Households Below Poverty Level		12.12%				

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

Source: 1990 US Census and 2002 HUD updated MFI

Cincinnati MSA AA – 2000 Census Data

Demographic Information for Full Scope Area: Cincinnati MSA AA – 2000 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	63	0.00	19.05	53.97	25.40	1.58
Population by Geography	337,737	0.00	17.62	54.67	27.68	0.03
Owner-Occupied Housing by Geography	93,396	0.00	16.76	53.68	29.56	0.00
Business by Geography	14,907	0.00	15.82	54.79	29.37	0.02
Farms by Geography	1,074	0.00	29.52	53.91	16.57	0.00
Family Distribution by Income Level	92,383	16.10	18.04	23.77	42.09	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	31,538	0.00	27.92	56.79	15.29	0.00
Median Family Income		54,690	Median Housing Value		111,600	
HUD Adjusted Median Family Income for 2003		64,000	Unemployment Rate (1990 US Census)		2.19%	
Households Below Poverty Level		10.06%				

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

Source: 2000 US Census and 2003 HUD updated MFI

Appendix B: Tables of Performance Data

Content of Standardized Tables

For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank's assessment area may receive positive CRA consideration. Refer to Interagency Q&As 12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Community Development Loans" column.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. 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 6. 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 7. 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 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. 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 11. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation

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

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

Table 13. 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.

Institution ID: NATIONAL BANK & TRUST

Table 1. Lending Volume

LENDING VOLUME												
Geography: WILMINGTON												
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Wilmington non-MSA AA	58.36	434	31,015	316	16,552	178	5,220	0	0	928	52,787	Please refer to the 2003 market share data.
Cincinnati MSA AA	41.64	428	33,899	180	14,818	54	4,230	0	0	662	52,947	

Table 1a. Lending Volume

LENDING VOLUME												
Geography: WILMINGTON												
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003												
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA@	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans@@		Total Reported Loans		% of Rated Area Deposits in MA/AA@@@
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Wilmington non-MSA AA	55.73	203	14,760	243	13,180	167	7,703	0	0	613	35,643	13.58%
Cincinnati MSA AA	44.27	262	24,691	154	16,639	71	4,712	0	0	487	46,042	4.40%

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

** The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2003.

*** Deposit Data as of November 17, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

@@ The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2003.

@@@ Deposit Data as of November 17, 2004. 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: WILMINGTON					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	135	65.22	0.00	0.00	29.03	8.15	70.97	91.85	0.00	0.00	2.48	0.00	1.34	2.79	0.00	
Cincinnati MSA AA	72	34.78	0.00	0.00	20.71	41.67	60.41	51.39	18.88	6.94	0.33	0.00	1.49	0.25	0.07	

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total@	% Owner Occ Units@@	% BANK Loans	% Owner Occ Units@@	% BANK Loans	% Owner Occ Units@@	% BANK Loans	% Owner Occ Units@@	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	44	55.00	0.00	0.00	22.87	18.18	72.50	70.45	4.63	11.36	Data for 2003 not yet available.					
Cincinnati MSA AA	36	45.00	0.00	0.00	16.76	30.56	53.68	61.11	29.57	8.33						

* Based on 2002 Peer Mortgage Data (CE)

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

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	66	47.14	0.00	0.00	29.03	13.64	70.97	86.36	0.00	0.00	6.12	0.00	3.74	7.02	0.00	
Cincinnati MSA AA	74	52.86	0.00	0.00	20.71	55.41	60.41	44.59	18.88	0.00	2.44	0.00	5.12	2.44	0.00	

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units®	% BANK Loans	% Owner Occ Units®	% BANK Loans	% Owner Occ Units®	% BANK Loans	% Owner Occ Units®	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	24	57.14	0.00	0.00	22.87	0.00	72.50	95.83	4.63	4.17	Data for 2003 not yet available.					
Cincinnati MSA AA	18	42.86	0.00	0.00	16.76	27.78	53.68	72.22	29.57	0.00						

* Based on 2002 Peer Mortgage Data (CE)

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

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

® 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.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: WILMINGTON				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	233	45.24	0.00	0.00	29.03	14.16	70.97	85.84	0.00	0.00	2.34	0.00	1.57	2.54	0.00	
Cincinnati MSA AA	282	54.76	0.00	0.00	20.71	43.97	60.41	47.52	18.88	8.51	0.65	0.00	2.14	0.56	0.22	

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: WILMINGTON				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units®	% BANK Loans	% Owner Occ Units®	% BANK Loans	% Owner Occ Units®	% BANK Loans	% Owner Occ Units®	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	135	39.36	0.00	0.00	22.87	10.37	72.50	74.81	4.63	14.81	Data for 2003 not yet available.					
Cincinnati MSA AA	208	60.64	0.00	0.00	16.76	30.77	53.68	58.17	29.57	11.06						

* Based on 2002 Peer Mortgage Data (CE)

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

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

® 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.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	316	63.71	0.00	0.00	27.40	7.59	72.60	92.41	0.00	0.00	4.07	0.00	1.59	5.16	0.00	
Cincinnati MSA AA	180	36.29	0.00	0.00	18.52	37.78	59.03	56.67	22.45	5.56	1.12	0.00	3.81	1.04	0.30	

Table 5a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Businesses [@]	% BANK Loans	% of Businesses [@]	% BANK Loans	% of Businesses [@]	% BANK Loans	% of Businesses [@]	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	243	61.21	0.00	0.00	25.05	5.76	70.33	89.30	4.62	4.94	Data for 2003 not yet available.					
Cincinnati MSA AA	154	38.79	0.00	0.00	15.83	19.48	54.80	70.13	29.37	10.39						

^{*} Based on 2002 Peer Small Business Data -- US and PR

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

^{***} Source Data - Dun and Bradstreet (2002).

[@] Source Data - Dun and Bradstreet (2003).

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography ⁷				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	178	76.72	0.00	0.00	20.23	3.37	79.77	96.63	0.00	0.00	16.60	0.00	5.00	19.41	0.00	
Cincinnati MSA AA	54	23.28	0.00	0.00	41.49	37.04	52.58	59.26	5.93	3.70	25.71	0.00	18.87	34.78	16.67	

Table 6a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography ⁷				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total	% of Farms [@]	% BANK Loans	% of Farms [@]	% BANK Loans	% of Farms [@]	% BANK Loans	% of Farms [@]	% BANK Loans						
Full Review:																
Wilmington non-MSA AA	167	70.17	0.00	0.00	14.41	0.60	78.09	67.66	7.50	31.74	Data for 2003 not yet available.					
Cincinnati MSA AA	71	29.83	0.00	0.00	29.52	23.94	53.91	64.79	16.57	11.27						

⁷ Based on 2002 Peer Small Business Data -- US and PR

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

^{***} Source Data - Dun and Bradstreet (2002).

[@] Source Data - Dun and Bradstreet (2003).

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/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:																
Wilmington non-MSA AA	135	65.22	25.19	4.55	18.88	22.73	24.10	37.88	31.84	34.85	2.83	1.25	1.91	2.42	4.25	
Cincinnati MSA AA	72	34.78	17.69	18.31	19.04	28.17	25.47	33.80	37.80	19.72	0.38	0.65	0.32	0.55	0.21	

Table 7a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/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:																
Wilmington non-MSA AA	44	55.00	20.98	13.64	19.77	18.18	23.62	20.45	35.63	47.73	Data for 2003 not yet available.					
Cincinnati MSA AA	36	45.00	16.10	11.11	18.04	25.00	23.77	36.11	42.09	27.78						

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

^{**} As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by BANK.

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

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

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

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

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/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:																
Wilmington non-MSA AA	66	47.14	25.19	12.12	18.88	30.30	24.10	31.82	31.84	25.76	6.65	9.09	7.87	8.21	2.86	
Cincinnati MSA AA	74	52.86	17.69	29.73	19.04	31.08	25.47	28.38	37.80	10.81	2.71	4.37	2.94	3.27	1.14	

Table 8a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/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:																
Wilmington non-MSA AA	24	57.14	20.98	33.33	19.77	8.33	23.62	33.33	35.63	25.00	Data for 2003 not yet available.					
Cincinnati MSA AA	18	42.86	16.10	61.11	18.04	27.78	23.77	5.56	42.09	5.56						

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

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

[®] Percentage of Families is based on the 2000 Census information.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/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:																
Wilmington non-MSA AA	233	45.24	25.19	8.30	18.88	20.52	24.10	34.06	31.84	37.12	2.75	2.92	2.98	2.93	2.46	
Cincinnati MSA AA	282	54.76	17.69	13.67	19.04	27.70	25.47	31.29	37.80	27.34	0.73	1.28	1.10	0.68	0.49	

Table 9a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: WILMINGTON					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/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:																
Wilmington non-MSA AA	135	39.36	20.98	4.58	19.77	16.79	23.62	29.01	35.63	49.62	Data for 2003 not yet available.					
Cincinnati MSA AA	208	60.64	16.10	14.01	18.04	28.99	23.77	29.95	42.09	27.05						

* Based on 2002 Peer Mortgage Data (CE)

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

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

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

@ As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by BANK.

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

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WILMINGTON			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Wilmington non-MSA AA	316	63.71	80.65	100.00	89.87	6.96	3.16	4.07	14.60
Cincinnati MSA AA	180	36.29	77.77	90.00	77.78	14.44	7.78	1.12	3.62

Table10a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WILMINGTON			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses [@]	% BANK Loans ^{****}	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Wilmington non-MSA AA	243	61.21	66.71	100.00	90.53	7.00	2.47	Data for 2003 not yet available.	
Cincinnati MSA AA	154	38.79	66.12	94.16	69.48	19.48	11.04		

* Based on 2002 Peer Small Business Data -- US and PR

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

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

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

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

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WILMINGTON			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Wilmington non-MSA AA	178	76.72	96.84	100.00	95.51	4.49	0.00	16.60	19.02
Cincinnati MSA AA	54	23.28	95.51	100.00	66.67	25.93	7.41	25.71	27.27

Table 11a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WILMINGTON			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms [®]	% BANK Loans ^{****}	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Wilmington non-MSA AA	167	70.17	96.49	100.00	87.43	10.78	1.80	Data for 2003 not yet available.	
Cincinnati MSA AA	71	29.83	93.02	100.00	81.69	12.68	5.63		

^{*} Based on 2002 Peer Small Business Data -- US and PR

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

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

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

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

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: WILMINGTON				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2003			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Wilmington non-MSA AA	0	0	54	57	54	57	53.27	0	0
Cincinnati MSA AA	0	0	40	50	40	50	46.73	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 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: WILMINGTON																	
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2003																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Wilmington non-MSA AA	50.44	9	50.00	0.00	11.11	88.89	0.00	1	0	0	0	+1	0	0.00	22.55	73.03	4.42
Cincinnati MSA AA	49.56	9	50.00	0.00	22.22	66.67	11.11	1	1	0	+1 & -1	0	0	0.00	17.62	54.67	27.68