Comptroller of the Currency Administrator of National Banks Bank

Large

Northeastern District Western Pennsylvania Field Office Monroeville, Pennsylvania

## **PUBLIC DISCLOSURE**

July 12, 1999

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

## First National Bank of Pennsylvania Charter Number 249 One FNB Boulevard Hermitage, Pennsylvania 16148

Office of the Comptroller of the Currency Northeastern District Western Pennsylvania Field Office 4075 Monroeville Boulevard Suite 300 Monroeville, Pennsylvania 15146

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

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## **GENERAL INFORMATION**

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

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **First National Bank of Pennsylvania** prepared by **The Office of the Comptroller of the Currency**, the institution's supervisory agency, as of <u>July 12, 1999</u>. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

## **Definitions and Common Abbreviations**

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

**Community Development (CD)** - Affordable 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.

**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.

**Full-Scope Review** - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

**Geography** - A census tract or a block numbering area 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

**Home Mortgage Loans** - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**Limited-Scope 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, branch distribution).

Low-Income - Income levels that are less than 50% of the median family income.

**Median Family Income (MFI)** - The median income determined by the United States 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 Statistical Area (MSA)** - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

**Small Business Loans** - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Farm Loans** - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

**Tier 1 Capital** - The total of common shareholders' equity, perpetual preferred shareholders equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income** - Income levels that are 120% or more of the MFI.

The following is a list of abbreviations and/or acronyms used throughout this Performance Evaluation.

Abbreviation or Acronym	Full Title, Name or Description
AA ATM BNA CDBG	Assessment Area Automated Teller Machine Block Numbering Area Community Development Block Grant
CFR	Code of Federal Regulations
CRA	Community Reinvestment Act
CT	Census Tract
EMSA	Erie MSA
FHA	Federal Housing Administration
FNB	First National Bank of Pennsylvania
FNBC	F.N.B. Corporation
FHLB	Federal Home Loan Bank
FNMAC	Federal National Mortgage Assistance Corp
GNMA	Government National Mortgage Association
HMDA	Home Mortgage Disclosure Act
LMI	Low- and Moderate-Income
MSA	Metropolitan Statistical Area
OCC	Office of the Comptroller of the Currency
PE	Performance Evaluation
SBA	Small Business Administration
SMSA	Sharon-Mercer MSA
VA	Veteran Administration
YWMSA	Youngstown-Warren MSA

## **INSTITUTION'S CRA RATING:** This institution is rated <u>Satisfactory</u>.

The following table indicates the performance levels of First National Bank of Pennsylvania (FNB) with respect to the lending, investment, and service tests.

Performance Levels	<b>FNB</b> Performance Tests			
	Lending Test*	Investment Test	Service Test	
Outstanding				
High Satisfactory	Х		Х	
Low Satisfactory		Х		
Needs to Improve				
Substantial Noncompliance				

\* The lending test is weighted more heavily than the Investment Test and Service Test when arriving at an overall rating.

Primary factors supporting the bank's overall rating are based on the activity in the state of Pennsylvania and include:

- Good responsiveness to credit needs and a high percentage of loans made throughout the assessment areas;
- A good distribution of loans among borrowers of different income levels with loans to moderate income borrowers exceeding area demographics in the state of Pennsylvania and the state of Ohio;
- An excellent distribution of loans to businesses of different sizes with a significant amount of loans originated at \$250 thousand or less in the state of Pennsylvania and the State of Ohio;
- A good level of community development lending in Pennsylvania;
- A good geographic distribution of small business loans and HMDA loans in the state of Pennsylvania;
- An adequate level of investments in Pennsylvania;
- Services and delivery systems are accessible to geographies and individuals of different income levels in Pennsylvania and Ohio; and
- A good level of community development services in the state of Pennsylvania.

#### **DESCRIPTION OF INSTITUTION**

First National Bank of Pennsylvania ("FNB") is a \$1.2 billion full service, interstate bank headquartered in Hermitage, Pennsylvania (PA). Hermitage is located approximately 60 miles north of Pittsburgh, PA. FNB is the lead bank of F.N.B. Corporation ("FNBC"), a \$3.5 billion holding company. The holding company operates eight other commercial banks and a trust bank throughout western Pennsylvania, eastern Ohio, and southern Florida. In June 1998, FNB acquired three additional branch offices in New Castle, PA from a large national bank. One of the acquired branches was merged with an existing FNB branch due to overlapping market areas. In addition, two branches in Erie, PA were consolidated in 1998. Currently, FNB operates 36 full-service branch offices and 31 automated teller machines throughout its AA. FNB has three wholly owned subsidiaries and one partially owned subsidiary. These subsidiaries have no impact on the bank's capacity to lend for community reinvestment purposes.

As of 3/31/99, total bank assets were \$1.2 billion, including investments of \$224 million and loans of \$897 million. Total deposits were \$1.1 billion. The loan portfolio was comprised of the following: 36% residential mortgage loans, 12% consumer loans, 16% commercial loans, 23% commercial real estate loans and 13% other loans. The bank's loan to deposit ratio is 85%. There are no impediments, legal or otherwise, which would hinder the bank's ability to help meet the credit needs of its AA.

FNB competes primarily with three large, multi-billion dollar financial institutions headquartered in Pittsburgh, PA and Cleveland, Ohio. Competition also comes from local banking institutions and mortgage companies competing for low-and moderate-income (LMI) individuals and geographies throughout the AA. The bank's 36 branches are located primarily throughout western and central Pennsylvania. FNB is an active lender in their communities and has been recognized by the Small Business Administration (SBA) as a preferred lender. FNB ranks fourth in the Pittsburgh SBA office in loan originations.

## SCOPE OF EVALUATION

## **Evaluation Period/Products Evaluated**

The period of review includes HMDA and small business loans from January 1, 1997 through December 31, 1998. Community development lending, investments, and service activities cover from April 1, 1997 through March 30, 1999. FNB also provided consumer loan information for auto loans, home equity loans, personal secured loans, and personal unsecured loans. Farm lending is not a part of FNB's primary lending activities and is not included in this assessment. Small business and home purchase lending, and community development activities received more consideration in assessing the overall rating. FNB most recent CRA examinations was March 1997.

#### **Data Integrity**

A minimal number of small business loans were omitted from publicly reported small business data. These loans were added to overall data for the Standard Tables. The number and dollar of these loans did not significantly affect the bank's automated reporting.

#### **Selection of Areas for Full-Scope Reviews**

In each state where the bank has an office, a sample of metropolitan and nonmetropolitan AAs within that state were selected for full-scope reviews. The areas selected are representative of the types of area in which the bank operates within those states. Refer to the *"Scope"* section under each *State Rating* for details regarding selection criteria and basis for representation.

#### Ratings

The bank's overall rating is a blend of the state ratings. The state of Pennsylvania encompasses a significant majority of of the bank's activities and was weighted more heavily in the overall rating.

The state ratings are based primarily on those areas that received full-scope reviews. Refer to the *"Scope"* section under each *State Rating* for details regarding how the areas were weighted in arriving at the overall state rating.

## FAIR LENDING REVIEW

A fair lending examination was conducted to evaluate compliance with fair lending regulations. We reviewed FNB's home purchase mortgage lending for the calendar year 1998. Examination included a review of lending policies and lending practices for possible overt discrimination or discriminatory impact on protected classes of citizens. We also conducted a comparative file analysis of approved home purchase mortgage loans. The sample was derived using FNB's 1998 Home Mortgage Disclosure Act Loan Application Register. Thirteen black applicants and sixty-five white applicants were selected. The comparative file analysis focused on possible disparities in terms and conditions. Our review of the mortgage lending policies and procedures and the results of our comparative file analysis indicate that the bank is in compliance with the fair lending regulations.

## STATE RATING

## CRA Rating for the State of Pennsylvania: The Lending Test is rated: The Investment Test is rated: The Service Test is rated:

Satisfactory High Satisfactory Low Satisfactory High Satisfactory

The major factors that support this rating include:

- A good distribution of loans among borrowers of different income levels with loans to moderate income borrowers exceeding area demographics;
- An excellent distribution of loans to businesses of different sizes with a significant amount of loans originated at \$250 thousand or less;
- A good level of community development lending, in Mercer and Lawrence AAs;
- A good geographic distribution of small business loans and HMDA loans;
- An adequate level of investments in Mercer and Erie AAs;
- Services and delivery systems are accessible to geographies and individuals of different income levels throughout each AA; and
- A good level of community development services in Mercer and Erie AAs.

## Description of Institution's Operations in the State of Pennsylvania

The prevailing majority of FNB's total operations are limited to the state of Pennsylvania. Thirty-five of FNB's thirty-six branches are located within the state. A full discussion regarding branching and ATM networks, loan distribution, and other activities can be found under the *Description of Institution* and *Market Profile* sections of this evaluation.

FNB designates six assessment areas (AAs) in Pennsylvania, three of which are Metropolitan Statistical Areas (MSAs) and three that are Block Number Areas (BNAs).

FNB's original and strongest market is the Mercer AA. The bank maintains a large market share and is an active lender in the area. FNB began efforts to expand its Erie area market share in 1997. This focus remains in effect and is reflected through recent branch construction and a more focused staffing plan. FNB's Lawrence County AA is representative of the bank's rural operations and represents a smaller market share than the larger Mercer and Erie AAs. Refer to the *Market Profiles for State of Pennsylvania in Appendix C* for detailed demographic and other performance context information for

AAs that received full-scope reviews.

## Scope of Evaluation in the State of Pennsylvania

This examination's full scope review includes the Sharon-Mercer MSA - 7610 (SMSA), the Erie MSA - 2360 (EMSA), and the Lawrence County non-MSA. These areas constitute a representation of both significant and less significant markets in which the bank operates. The bank designates full counties for each Pennsylvania AA. Information for MSAs is discussed according to counties as follows:

- SMSA Mercer; and
- EMSA Erie.

Ratings are based primarily on results of those areas that received full-scope reviews with further weighting given to the bank's most active AAs. In order of volume and market share, those areas are Mercer County, Erie County, and Lawrence County. Refer to the **Table 1 in Appendix A** for more information.

Primary consideration was given to FNB's larger established market areas in Mercer, Erie, and Lawrence Counties when assessing the overall rating. Limited scope areas, including the Butler County AA, the Crawford County AA, and the Venango County AA received less consideration in the overall rating. FNB's presence in Butler County is limited to a single branch in a market segment contrary to the bank's marketing area. The Crawford and Venango County AAs are rural areas with activities similar to the Lawrence County AA.

## **Community Contacts**

Two community groups were contacted during this examination and two additional interagency contacts were reviewed. Personal contacts were made with a community action group in Mercer County and a group of housing officials in Lawrence County. Interagency contacts reviewed included a government housing official and a local housing group in Erie County. Erie County information was obtained in 1996 and was before FNB had begun focusing its marketing efforts in that area.

• Mercer and Lawrence County groups identified a significant need for low or no cost deposit services as well as a need for home purchase, improvement and rehabilitation loans in LMI areas. Specific needs were cited for the area's significant senior population.

In addition, the Lawrence County representatives identified a need for local home ownership support in the form of educational home finance seminars and credit counseling assistance for purchase mortgages and retail banking services in LMI areas. Lawrence County representatives also commented on FNB's work in developing and promoting LMI housing programs despite setbacks in working with local government operations.

The Mercer County representative also identified a small business lending need for working capital and capital improvement loans within LMI areas. They noted that this type of small business lending would serve to promote economic viability in LMI areas. Mercer County representatives commented on FNB's participation in discussions regarding low and no cost deposit services.

Each group indicated active participation and support by FNB regarding local lending efforts for both home mortgages and home improvements, but they were not readily aware of loan underwriting criteria at local financial institutions. A need was indicated for additional communication regarding local lending programs.

• Erie County representatives indicated a need for home purchase and rehabilitation loans for LMI borrowers as well as small business loans within LMI areas.

Erie groups indicated participation by larger, regional banks, and noted the absence of marketing efforts by institutions which are not headquartered in the Erie area. These groups also indicated a need for low and no cost deposit services.

## LENDING TEST

## **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in the State of Pennsylvania is rated "high satisfactory." Based on full-scope reviews, the bank's performance in the Mercer and Erie MSAs and the Lawrence County non-MSA is good.

## **Lending Activity**

Refer to **Table 1 in the State of Pennsylvania section of Appendix D** for the facts and data used to evaluate the bank's lending activity.

FNB demonstrates a good responsiveness to the community's credit needs. FNB's commitment to the community is indicated by:

- A high loan to deposit average; and
- A significant volume of HMDA and small business loans made.

FNB's average quarterly loan to deposit ratio since June 30, 1997 is 82%. The loan to deposit ratio at March 31, 1999 is 81%. The quarterly average ratio does not significantly vary from the quarterly national peer ratio of 86%.

FNB ranks 1<sup>st</sup> among all mortgage related lending and small business lending in Mercer County where approximately 50% of all loans are originated. Market rankings for all types of lending for Erie and Lawrence Counties are generally between 4<sup>th</sup> and 10<sup>th</sup>. The following table details market rank, loan volume, and competition in the three full scope AAs. FNB rank's 1<sup>st</sup> among FDIC insured institutions in Mercer County with approximately 32% of deposit market share. Deposit market ranking for Lawrence and Erie County is 6<sup>th</sup> with a market share of 6% and 8%, respectively.

Home Mortgage Lending

	Home Purchase		Home Improvement			Home Refinance			
	Mkt	Mkt	# of	Mkt	Mkt	# of	Mkt	Mkt	# of
	Rank	Share	Lenders	Rank	Share	Lenders	Rank	Share	Lenders
Mercer	1	22%	98	1	36%	34	1	26%	103
Erie	9	3%	116	5	9%	34	4	7%	117
Lawrence	4	8%	58	3	12%	28	1	12%	65

**Small Business Lending** 

	Small Business			
	Mkt	Mkt	# of	
	Rank	Share	Lenders	
Mercer	1	21%	28	
Erie	6	5%	33	
Lawrence	19	1%	134	

## Distribution of Loans by Income Level of the Geography

Assessment Area Concentration - Bankwide

FNB originates a substantial majority of its housing loans and small business loans within the AAs. HMDA loan data available for the period from January 1, 1997 to December 31, 1998 indicates 95% by volume and 94% of the dollar amount of housing related loans were made within the AA.

The table below details reported HMDA lending within the AAs.

	Percentage in the AA		
Loan Type	#	\$	
Home Purchase	95%	94%	
Refinance	96%	94%	

Home Improvement	96%	95%
Totals	<b>95</b> %	<b>94%</b>

FNB also originated a substantial majority of its small business loans within the AA. Small business data available for the same period indicates 93% by number and 90% by dollar of loans made to businesses with revenues of \$1 million or less were made within the AA. The high volume of small dollar loans within the AA demonstrates FNB's commitment to local small dollar lending. The following table details the percentage of small business loans delineated by dollar amounts. **Table 1 of Appendix B** details FNB's overall lending activities.

	Percentage in the AA		
Loan Type	#	\$	
\$100,000 or less	93%	93%	
\$100,000 to \$250,000	91%	90%	
Over \$250,000	84%	84%	
Totals	93%	90%	

#### **Home Mortgage Loans**

Refer to **Tables 2, 3, and 4 in the State of Pennsylvania section of Appendix D** for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

#### Mercer

FNB's geographic distribution of home purchase and home improvement loans is good. These loans approximate or exceed owner occupied housing demographics for the area's LMI tracts. In addition, the bank's market share regarding low and moderate income geographies exceeds its overall market share of 23.5%. Specifically, FNB's market share for home purchase loans in low income tracts is 52% which significantly exceeds its overall market share. While FNB's home purchase and home improvement lending is higher than area demographics, loans for home refinancings approximate or are below owner occupied housing distribution among LMI geographies. Home refinance opportunities in low and moderate income CTs of the AA are limited due primarily to a significant proportion of owner occupied housing being concentrated in the middle and upper income CTs.

#### Erie

FNB's geographic distribution of home purchase and home improvement loans is excellent. These loans exceed owner occupied housing demographics for all LMI tracts. The bank exceeds overall market share for home refinance loans. In addition, the bank's

market share regarding low and moderate income geographies is generally higher than its overall market share. FNB's home purchase and home improvement lending is higher than area demographics. Loans for home refinancings approximate owner occupied housing distribution among LMI geographies and exceed overall market share.

#### Lawrence

FNB's geographic distribution of HMDA loans is adequate. FNB's percentage of loans in LMI tracts is below the percentage of owner occupied housing for all loan types. Home mortgage and home refinance opportunities in low and moderate income BNAs of the AA are limited due primarily to a significant proportion of owner occupied housing being concentrated in the middle and upper income BNAs. Approximately 84% of owner occupied housing in Lawrence County is in middle and upper income BNAs.

## **Small Loans to Businesses**

Refer to **Table 5 in the State of Pennsylvania section of Appendix D** for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

#### Mercer

The geographic distribution of small business loans within the AA is excellent. The distribution of small business loans in low income tracts exceeds the distribution of small businesses within those tracts. In addition, the distribution of loans in moderate income tracts approximates the distribution of businesses within moderate tracts.

#### Erie

The geographic distribution of small business loans within the AA is good. The distribution of small business loans among LMI CTs approximates the distribution of businesses within those same tracts. Additionally, distribution among low income CTs approximates the bank's overall market share.

#### Lawrence

The geographic distribution of small business loans within the AA is adequate, based on strong competition for these loans. The distribution of small business loans among LMI geographies is below the distribution of businesses within those same tracts. However, over, 70% of reporting businesses are located in the middle and upper income

geographies. In addition, we could not fully rely on the business data in our analysis since over 50% of businesses in LMI tracts did not report income.

## **Consumer Loans**

Refer to **Table 14 thru 17 in the State of Pennsylvania section of Appendix D** for the facts and data used to evaluate the geographical distribution of the bank's consumer loan originations.

FNB's distribution of consumer loans is adequate. The bank approximates or exceeds the low and moderate population regarding auto lending and personal secured lending for Mercer and Erie counties. Home equity and personal unsecured lending is generally below the low and moderate population in Mercer and Erie counties. Lawrence county consumer lending is generally below the population of low and moderate persons in the area.

## Distribution of Loans by Income Level of the Borrower

#### **Home Mortgage Loans**

Refer to **Tables 7, 8 and 9 in the State of Pennsylvania section of Appendix D** for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

#### Mercer

FNB's record of housing related lending to borrowers of different income levels is good. The percentage of HMDA loans to moderate income borrowers approximates or exceeds the percentage of moderate income families in the AA for all loan types. In addition, the bank demonstrates a commitment to lending to moderate income borrowers as it approximates or exceeds its overall market share for lending among moderate income borrowers. HMDA lending among low income borrowers is below the percentage of low income families in the AA. However, the bank also demonstrates its commitment to lending to low income borrowers is also impacted by area demographics. The largest percentage of low income families reside in middle income census tracts (85%) with 11% of those living below poverty level. With a 1990 median housing cost in those tracts of \$45,161 and median family income of \$35,000, a 25 year mortgage at 7.5% appears prohibitive to some low income borrowers.

## Erie

FNB's record of housing related lending to borrowers of different income levels is good. The percentage of HMDA loans to moderate income borrowers exceeds the percentage

of moderate income families in the AA for home purchase and home improvement loans. In addition, the bank demonstrates a commitment to lending to moderate income borrowers as it exceeds its overall market share for lending among moderate income borrowers for home improvement and refinance. HMDA lending among low income borrowers is below the percentage of low income families in the AA. However, the bank also demonstrates a commitment to lending to low income borrowers by exceeding market share for home purchase and refinance despite intense competition. FNB ranks 9<sup>th</sup> in overall market share in an area served by over 200 mortgage lenders. Home mortgage lending to low income borrowers is also impacted by area demographics. The largest percentage of low income families reside in middle and moderate income census tracts (75%). Furthermore, among moderate income tracts 24% of families are below poverty levels.

#### Lawrence

FNB's record of housing related lending to borrowers of different income levels is adequate. The percentage of HMDA loans to moderate income borrowers approximates the percentage of moderate income families and market share in the AA for all types of loans. HMDA lending among low income borrowers is below the percentage of low income families in the AA. However, the bank does maintain a 5<sup>th</sup> place market share for all loan types in an area served by 125 mortgage lenders. The top lender has a market share of 10% compared to FNB's market share of 6%. Home mortgage lending to low income borrowers is also impacted by area demographics. The largest percentage of low income families reside in middle income BNAs (61%) and within these tracts 13% are below poverty level. Furthermore, among moderate income tracts 23% of families are below poverty levels. Among low income tracts, 12% of families are below poverty level.

#### **Small Loans to Businesses**

#### Mercer

FNB's distribution of loans among businesses of different sizes is excellent. FNB's commitment to small business lending is demonstrated in its leadership role with the SBA and overall market rank in the AA. 1997 market data indicates that 76% of businesses within the AA are small businesses, with annual gross revenues \$1 million or less. During the assessment period, FNB extended 72% of total loans to businesses with gross revenues \$1 million or less while market lenders average 45% of total loans to businesses of \$1 million or less. FNB ranks 1<sup>st</sup> among 28 business lenders in the AA. The bank's small business market share exceeds the overall market share in business lending. A significant majority (87%) of total small business loans reported is in original amounts of \$250 thousand or less. Of those, FNB has demonstrated a significant commitment to small dollar lending by providing 73% of loans to area businesses at under \$100,000.

## Erie

FNB's distribution of loans among businesses of different sizes is excellent. FNB's commitment to small business lending is demonstrated in its participation in SBA lending and overall market rank in a highly competitive AA. The area's top three business lenders control 60% of the small business lending market. The next two lenders and FNB (ranked 6<sup>th</sup>) control another 22% of the market. 1997 market data indicates that 69% of businesses within the AA are small businesses, with annual gross revenues \$1 million or less. During the assessment period, FNB also extended 69% of total loans to businesses of \$1 million or less. A significant majority (86%) of total small business loans reported is in original amounts of \$250 thousand or less. Of those, FNB has demonstrated a significant commitment to small dollar lending by providing 67% of loans to area businesses at under \$100,000. These loans are included in the **State of Pennsylvania in Appendix D**.

#### Lawrence

FNB's distribution of loans among businesses of different sizes is excellent. FNB's commitment to small business lending is demonstrated in its participation in SBA lending and the volume of small business lending within the AA despite a highly competitive market. FNB ranks 19<sup>th</sup> among over 130 lenders in the AA. 1997 market data indicates that 74% of businesses within the AA are small businesses, with annual gross revenues \$1 million or less. During the assessment period, FNB exceeded that percentage by extending 78% of total loans to businesses with gross revenues \$1 million or less. Area market lenders averaged 61% of total loans to business of \$1 million or less. A significant majority (89%) of total small business loans reported is in original amounts of \$250 thousand or less. Of those, FNB has demonstrated a significant commitment to small dollar lending by providing 73% of loans to area businesses at under \$100,000.

#### **Consumer Loans**

Refer to **Tables 14-17 in the State of Pennsylvania section of Appendix D** for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

#### Mercer

FNB's record of consumer lending is good. FNB distribution of auto, personal secured, and personal unsecured loans exceeds the percentage of LMI households in the AA. Home equity lending approximates or exceeds the percentage of LMI households.

Erie

FNB's record of consumer lending is good. FNB distribution of auto, personal secured, and personal unsecured loans exceeds the percentage of LMI households in the AA. Home equity lending approximates or is below the percentage of LMI households.

#### Lawrence

FNB's record of consumer lending is good. FNB distribution of auto, home equity, personal secured, and personal unsecured loans approximates or exceeds the percentage of LMI households in the AA.

## **Community Development Lending**

Refer to **Table 1 in the State of Pennsylvania section of Appendix D** for the facts and data used to evaluate the bank's level of community development lending.

## Mercer

FNB originates a good level of Community Development loans in Mercer County. Since our prior examination, the bank has extended three Community Development loans to two entities in Mercer County totaling \$2.9 million. These loans were made to provide affordable housing and nursing care to LMI senior citizens, an identified community credit need.

The bank has also originated small business loans in Mercer County to organizations with stated, community development purposes. For example, FNB has originated a small business loan to an organization providing housing and services to the homeless. FNB has also originated two loans to organizations with economic development purposes. One of these loans was extended to a tax exempt corporation which owns, develops, and manages, land and buildings for economic development purposes. Another loan was extended to a commercial enterprise located within an enterprise zone which provides jobs for low and moderate income area residents. These loans are reported in the *Small Business Tables in the State of Pennsylvania section of Appendix D*.

## Erie

FNB has not originated a community development loan that is not reported under small business lending in Erie County over the current period. Limited business expansion and growth has restricted the bank's opportunity to participate in community development opportunities. However, the bank has originated several small business loans in Erie County to organizations with stated community development purposes. For example, FNB has originated three small business loans to organizations providing housing, care and services to low and moderate income disabled individuals. FNB has also originated loans to organizations that serve the needs of low and moderate income individuals. Services provided to low and moderate income individuals through these organizations include English language, job placement, youth and daycare programs. These loans are reported in the *Small Business Tables in the State of Pennsylvania section of Appendix D*.

### Lawrence

FNB originates an excellent level of Community Development loans in Lawrence County. Since our prior examination, the bank has extended a Community Development loan in Lawrence County totaling \$4.2 million. The loan was made to provide affordable housing and nursing care to LMI senior citizens which is an identified community credit need.

The bank has also originated a small business loan in Lawrence County to an organization with a stated, community development purpose. The organization provides housing for low income, mentally disabled residents dependent upon disability income. This loan is reported in the *Small Business Tables in the State of Pennsylvania section of Appendix D.* 

#### **Product Innovation and Flexibility**

FNB has developed and implemented several lending programs that benefit LMI borrowers and geographies within the AA. These programs are available AA wide. The bank's "Family Home Ownership Program" was developed in response to an AA need for affordable housing. This lending program offers flexible underwriting to LMI borrowers. Since the last examination, the bank has made 131 loans totaling \$4 million. These loans are reported in the **Tables in the State of Pennsylvania section of Appendix D**.

FNB has also developed and introduced an innovative community development loan program in Mercer County designed to assist borrowers in starting small businesses through the Mercer County Housing Authority Business Incubator Plan. The program was initiated during the first half of 1998 and a micro loan has since been funded. The program requires loan candidates to participate in a business planning program through the local Penn State University campus to enhance the prospect of long term success and creates inherent lag time in loan funding. The plan was recognized by regional media and involves a comprehensive and sometimes lengthy process which allows LMI individuals and small businesses to enter the small business market. The timing and nature of this program has limited FNB's lending to date to one loan for \$3,500. These loans are reported in **Tables 1, 5, and 10 in the State of Pennsylvania section of Appendix D**.

#### **Conclusions for Areas Receiving Limited Scope Reviews:**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Crawford/Venango nonMSA and Butler MSAs is not inconsistent with the bank's overall good performance under the Lending Test in the State of Pennsylvania. Refer to **Tables 1** *through 17 in the State of Pennsylvania section of Appendix D* for facts and data that support these conclusions.

#### **INVESTMENT TEST**

#### **Conclusions for Areas Receiving Full Scope Reviews:**

The bank's performance under the Investment Test in the State of Pennsylvania is rated "low satisfactory." Based on full-scope reviews, the bank's performance in Mercer County is good and performance in Erie and Lawrence Counties is adequate. The investments are not innovative and contain only minimal complexities. However, FNB has increased the dollar and volume of activity in this area since the prior examination. Investment opportunities within the bank's AA are generally limited to housing based mortgage securities. The bank specifically seeks out these types of opportunities at the statewide level and within individual AAs.

FNB purchased a mortgage back security investment for allocation among the bank's AAs. This \$1 million mortgage-backed security pool, composed of mortgages originated under a low income mortgage program, and pooled together by a large, local regional bank is allocated to each AA based on the volume percentage of loans each AA has in the pool. Each AA's allocation has been divided and classified within *Table 12 in the State of Pennsylvania section of Appendix D.* The low income mortgage program backing the security pool featured flexible underwriting such as reduced down payment requirements. The investment allocation is detailed below.

	Dollar	Percentage
Mercer	\$292	29%
Erie	\$300	30%
Lawrence	\$100	10%
Crawford/Venango	\$208	21%
Butler County	\$100	10%

Refer to **Table 12 in the State of Pennsylvania section of Appendix D** for the facts and data used to evaluate the bank's level of qualified investments.

Mercer

FNB's level of qualified investments in Mercer County is good. The bank has increased the dollar and volume of activity in this area since the prior examination. FNB added qualified investments totaling \$175 thousand during this review period and maintains another totaling \$531 thousand from the prior review. Both the prior and current period investments are for projects that provide affordable housing. The qualified investment for \$175 thousand made during the current period was a commitment to a community development corporation (CDC). The CDC was formed to rehabilitate deteriorated and vacant property in LMI geographies within the assessment area. Qualified donations totaling \$21,000, represent contributions to

affordable housing groups, youth and other programs supporting activities that benefit LMI individuals or geographies and economic development throughout the AA.

#### Erie

FNB's level of qualified investments in Erie County is adequate. The bank has increased the dollar and volume of activity in this area since the prior examination. Limited business expansion, growth, and community development activity have restricted the bank's opportunity to participate in community development investments in this county. However, FNB has added seven qualified donations totaling \$11,000 during this review period. Qualified donations represent contributions to affordable housing, credit counseling and youth services targeting LMI individuals, and organizations promoting economic development. The Erie AA was credited with the volume of the previously noted MBS which was allocated by dollar to each AA. This volume credit is based on the largest dollar allocation and increases total investment volume in Erie to eight.

#### Lawrence

FNB's level of qualified investments in Lawrence County is adequate. The bank has increased the dollar and volume of activity in this area since the prior examination. FNB added five qualified donations totaling \$15,000 during this review period. Qualified donations represent contributions to affordable housing and healthcare groups targeting low and moderate income individuals in addition to organization promoting economic development.

#### **Conclusions for Areas Receiving Limited Scope Reviews:**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Crawford/Venango and Butler MSAs is not inconsistent with the bank's overall good performance under the Investment Test. Refer to **Table 12 in the State of Pennsylvania section of Appendix D** for the facts and data that support these conclusions.

#### SERVICE TEST

## **Conclusions for Areas Receiving Full Scope Reviews:**

The bank's performance under the Service Test in the State of Pennsylvania is rated "high satisfactory." Based on full scope reviews, the bank's performance in Mercer and Erie Counties is good and in Lawrence County is adequate.

### **Retail Banking Services**

Refer to **Table 13 in the State of Pennsylvania section of Appendix D** for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

#### Mercer

FNB's retail delivery services are accessible to geographies and individuals of different income levels. The bank's network of branches and ATMs are considered to be accessible to all portions of its AA. The percentage of branches exceeds the percentage of population in LMI geographies. There are 14 full service branches in the AA. Of the 14 branches, 1 is in a low-income CT, 2 are in moderate-income CTs, 10 are in middle-income CTs, and 1 is in an upper-income CT. There are 12 bank-owned ATMs in the AA. Of the 12 ATMs, 9 are in middle-income CTs and 3 are in upper-income CTs. The ATMs in middle income tracts are geographically accessible to moderate income tracts.

There have been no branch closings since the prior examination. Business hours are reasonable. There were no material differences in hours of operations and services offered in FNB branches located in LMI areas. Regional branch administrators systematically monitor customer usage of all branches and tailor the hours accordingly. There were no comments in the Public File regarding branch hours. ATMs are the primary alternative delivery system used for retail services.

The bank offers a good level of retail banking services throughout its AAs including telephone banking and no charge ATM service at all MAC network ATMs. We could not determine specific benefits to FNB's LMI population or areas because the bank does not track or report this type of information.

#### Erie

FNB's retail services are accessible to geographies and individuals of different income levels. The bank has 9 full-service branches within this AA. The percentage of branches exceeds the percentage of population in LMI geographies. Of the 9 branches, 1 is in a low-income CT, 2 are in moderate-income CTs, 5 are in middle-income CTs, and 1 is in an upper-income CT. The branch network in LMI geographies is consistent with

the population distribution and the service needs of the AA. Two branches in Erie, Pa. were consolidated in 1998. There are 8 bank-owned ATMs in the AA. Of the 8 ATMs, 1 is located in a low-income CT, 1 is located in a moderate-income CT, 5 are located in middle-income CTs, and 1 is located in an upper-income CT.

Business hours are reasonable. There were no material differences in hours of operations and services offered in FNB branches located in LMI areas. Regional branch administrators systematically monitor customer usage of all branches and tailor the hours accordingly. There were no comments in the Public File regarding branch hours. ATMs are the primary alternative delivery system used for retail services.

The bank offers a good level of retail banking services throughout its AAs including telephone banking and no charge ATM service at all MAC network ATMs. In addition, FNB developed marketing brochures printed in Spanish to address the needs of the AA's Spanish speaking population. We could not determine specific benefits to FNB's LMI population or areas because the bank does not track or report this type of information.

#### Lawrence

FNB's retail banking services are accessible to geographies and individuals of different income levels. Branches and ATMs are accessible to all portions of its AA. The percentage of branches exceeds the percentage of population in moderate income geographies, but is less than the population in low income geographies. There are 4 full service branches in the AA. Of the 4 branches, 1 is located in a moderate-income BNA and 3 are in upper-income BNAs. There are 4 bank-owned ATMs in the AA. Of the 4 ATMs, 1 is in a moderate-income BNA, 2 are in middle-income BNAs, and 1 is in an upper-income BNA.

There have been no branch closings since the prior examination. Business hours are reasonable. There were no material differences in hours of operations and services offered in FNB branches located in LMI areas. Regional branch administrators systematically monitor customer usage of all branches and tailor the hours accordingly. There were no comments in the Public File regarding branch hours. ATMs are the primary alternative delivery system used for retail services.

The bank offers a good level of retail banking services throughout its AAs including telephone banking, no charge ATM service at all MAC network ATMs. We could not determine specific benefits to FNB's LMI population or areas because the bank does not track or report this type of information.

#### **Community Development Services**

## Mercer

FNB is involved in a good level of community development activities in the AA. The community development services that the bank is involved in address areas such as credit counseling, affordable housing, and economic development. Some of the activities that the bank is involved in are as follows:

- Free social security check cashing for senior citizens.
- The head of branch administration in Mercer County served as the Chairman of the Shenango Valley Urban League. The Urban League is an advocate for minorities and LMI populations in the Shenango Valley. Activities performed by the organization include credit counseling and sponsoring first-time homebuyers seminars.
- An assistant branch manager serves on the city of Sharon's Community Redevelopment Committee. The Redevelopment Committee serves to promote economic and housing development in the city of Sharon. Three bank employees review loan applications for city loans to rehabilitate houses. Applicants must be LMI individuals.
- A secretary in commercial lending serves on the board of directors for Mercer County Literary Council. The organization provides adult literary assistance and childhood development programs targeted to low- and moderate-income families.
- A branch manager serves on the executive board for Greenville's Downtown Revitalization Program. The group is attempting to obtain state funding for area businesses to maintain the downtown area which is targeted for revitalization.
- The head of branch administration serves on the Pennsylvania Department of Community and Economic Development's Regional Housing Advisory Committee. The committee serves the areas LMI population. Area representatives meet periodically to inform the agency of housing needs in their areas.
- A significant number of bank staff develop and participate in educational programs on economics and banking at local schools, including inner city schools in LMI areas.
- A significant number of bank staff develop and participate in outreach activities to promote the bank's First Time Homebuyers Program (FHOP). This LMI borrower program combines consumer education and flexible underwriting to promote home ownership among the areas LMI population. *Erie*

The bank is involved in a good number of community development services and activities

in the AA. Some of the activities and services provided as as follows:

- Free social security check cashing for senior citizens;
- A branch administrator was appointed to the board of directors of GECAC (Greater Erie Community Action Committee) Charter Schools. He serves on the management committee. GECAC is a social services organization. The school is located in a low-income area. The majority of the students are from LMI families.
- A branch manager serves on the board of directors as treasurer for the Erie Habitat for Humanities.
- The bank administers H.A.N.D.S. (Housing and Neighborhood Development Services) for a Federal Home Loan Bank grant application for two housing projects for physically challenged and the chronic mental ill. The projects are located in LMI areas and the majority of recipients are within LMI guidelines. During the examination period, FNB acted as a conduit for FHLB funds totaling \$117,000.
- A significant number of bank staff develop and participate in educational programs on economics and banking at local schools, including inner city schools in LMI areas.
- A significant number of bank staff develop and participate in outreach activities to promote the bank's First Time Homebuyers Program (FHOP). This LMI borrower program combines consumer education and flexible underwriting to promote home ownership among the areas LMI population.
- FNB provides non-fee deposit accounts for two area economic development groups. These groups target economic development and revitalization in LMI areas.

The bank also serves as the depository for savings accounts opened by GECAC for participants in the Family Savings Account (FSA) Program sponsored by the Pennsylvania Department of Community and Economic Development. The FSAs are restricted savings accounts to help low-income families attain self-sufficiency through savings and asset accumulation. FNB personnel worked with GECAC to finalize training classes for participants and conducted seminars on home buying and savings for participants.

## Lawrence

FNB's record of community development services is adequate based on the limited opportunities available in this AA. There were minimal community development services in this AA. Management stated, and local officials concurred, that opportunities to involve the bank in community development services are very limited.

Since the prior review, bank officials have developed and promoted several affordable housing and economic development projects in Lawrence County. However, due to circumstances outside the bank's control, these projects were not implemented. FNB continues to develop and promote community development projects for this area. The bank's staff does participate in the FHOP and educational programs discussed in the Mercer and Erie assessments.

#### **Conclusions for Areas Receiving Limited Scope Reviews:**

Based on limited-scope reviews, the bank's performance under the Service Test in the Crawford/Venango nonMSA's and Butler MSA, is not inconsistent with the bank's overall performance under the Service Test. Refer to **Table 13 in the State of Pennsylvania section of Appendix D** for the facts and data that support these conclusions.

## **State Rating**

CRA Rating for the State of Ohio: The Lending Test is rated: The Investment Test is rated: The Service Test is rated:

Satisfactory Low Satisfactory Low Satisfactory Low Satisfactory

The major factors that support this rating include:

- A good distribution of home mortgage loans to low income borrowers and an adequate distribution of home mortgages to moderate income borrowers;
- A good distribution of small business loans among businesses of different sizes;
- An adequate record of consumer lending;
- Retail services are accessible to geographies and individuals of different income levels; and

## **Description of Institution's Operations in Ohio**

FNB's operations in the state of Ohio are limited to a single branch with an AA consisting of two middle income CTs in Trumbull County, Ohio. While the branch offers the same services available throughout FNB's organization, customer activity is negatively impacted by lack of name recognition and state related loyalties.

Trumbull County, Ohio is located on the Pennsylvania/Ohio border across from Mercer County, Pennsylvania. It is approximately 40 miles southeast of Cleveland, Ohio. Population for the Trumbull County AA is approximately 10,500. FNB has only a small presence in this market with an AA comprised of two middle income CTs.

The manufacturing industry continues to employ the most workers, increasing about 10% each year. The unemployment rate for the county is 5.8%. Trumbull County ranks 38<sup>th</sup> in unemployment among Ohio's 88 counties. Major employers in the county include light manufacturing; retail facilities; and industries related to the automobile industry. Trumbull County had 275 reporting businesses for the entire county, of which 192 had revenues of \$1 million or less.

## Scope of Evaluation in Ohio

The Trumbull County AA received a full scope review due to regulatory requirements to assess a rating for each state in which the bank has operations. The Trumbull AA represents a negligible portion of the bank operations at 1% of reported loan volume, 1% of CT volume, and 2% of the branching network. Due to the bank's limited presence in this state, it received minimal consideration when assessing FNB's overall rating.

## LENDING TEST

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in the State of Ohio is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Trumbull County AA is adequate.

## **Lending Activity**

Refer to **Table 1 in the State of Ohio section of Appendix D** for the facts and data used to evaluate the bank's lending activity.

Trumbull County market rankings are generally favorable, lending activity is limited due to minimal name recognition outside the bank's Pennsylvania market. The following table details home mortgage and small business market rank, loan volume, and competition in the full scope AA.

	Home Purchase		Home Improvement		Home Refinance				
	Mkt	Mkt	# of	Mkt	Mkt	# of	Mkt	Mkt	# of
	Rank	Share	Lenders	Rank	Share	Lenders	Rank	Share	Lenders
Trumbull	16	4%	33	2	16%	13	1	20%	40

	Small Business			
	Mkt	Mkt	# of	
	Rank	Share	Lenders	
Trumbull	16	1%	68	

Due to Trumbull County's limited presence, a separate analysis of loan to deposit activity was not performed.

## Distribution of Loans by Income Level of the Geography

FNB's Trumbull County AA consists entirely of middle income CTs. Therefore, a geographic analysis would not be meaningful and was not performed.

## Distribution of Loans by Income Level of the Borrower

Refer to **Tables 6,7 and 8 in the State of Ohio section of Appendix D** for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

#### **Home Mortgage Lending**

FNB's record of housing related lending to borrowers of different income levels is adequate. Lending patterns in the Trumbull AA reflect the bank's limited presence in that area. The percentage of home purchase and refinance loans to low income borrowers exceeds the percentage of low income families in the AA. HMDA lending among moderate income borrowers is below the percentage of moderate income families in the AA.

#### **Small Loans to Businesses**

Refer to **Tables 5 and 10 in the State of Ohio section of Appendix D** for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

FNB's distribution of loans among businesses of different sizes is good. FNB's commitment to small business lending is demonstrated in its volume of small business lending within the AA despite a small market presence. 1997 market data indicates that 70% of businesses within the AA are small businesses, with annual gross revenues \$1 million or less. During the assessment period, FNB exceeded that percentage by extending 89% of total loans to businesses with gross revenues \$1 million or less. Area market lenders averaged 59% of total loans to businesses of \$1 million or less. A significant majority (77%) of total small business loans reported is in original amounts of \$250 thousand or less. Of those, FNB has demonstrated a significant commitment to small dollar lending by providing 72% of loans to area businesses at under \$100,000.

#### **Consumer Loans**

Refer to **Tables 14 thru 17 in the State of Ohio section of Appendix D** for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

FNB's record of consumer lending is adequate. FNB distribution of auto, personal secured, and personal unsecured loans approximates or exceeds the percentage of LMI households in the AA. Home equity lending exceeds the percentage of moderate households and is below demographics in low income households.

#### **Community Development Lending**

## Refer to Table 1 in the State of Ohio section of Appendix D.

FNB has not originated a community development loan in Trumbull County, Ohio. However, the bank has originated a small business loan in Trumbull County to an organization with a stated community development purpose. The loan was made to an organization that provides housing and skilled nursing care to LMI senior citizens. This loan is reported in the *Small Business tables in the State of Ohio section of Appendix D*.

### **Product Innovation and Flexibility**

A discussion of product innovation and flexibility can be found in the *State of Pennsylvania* section of the PE. FNB products and services are available throughout the organization. Due to Trumbull County's limited presence, a separate analysis was not performed.

#### **INVESTMENT TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in Ohio is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Trumbull County AA is adequate.

## Refer to Table 12 in the State of Ohio section of Appendix D.

FNB's has no qualified investments, donations or grants, which can be attributed specifically to Trumbull County, Ohio. Based on FNB's internal research and examiner research, the availability of qualified investments within the bank's geographic area is limited. The AA is located in a rural environment which does not directly benefit from state sponsored economic aid. However, during the current period, FNB invested in a mortgage backed security pool which contained low income mortgages originated throughout the bank's Pennsylvania AAs. Given the AA's close proximity and the presence of Pennsylvania residents in the AA's customer base, this investment should benefit a portion of the AA. The low income mortgage program backing the security pool featured flexible underwriting such as reduced downpayment requirements. Additionally, a portion of the donations attributed to the bank's Pennsylvania AAs benefit a larger geographic area, including the Ohio AA. These include donations to area Habitat for Humanity and Penn-Northwest. Penn-Northwest is an organization that provides jobs and economic development in nearby Sharon, PA.

#### SERVICE TEST

#### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to **Table 13 in the State of Ohio section of Appendix D** for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

The bank's performance under the Service Test in Ohio is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Trumbull County AA is adequate.

### **Retail Banking Services and Community Development Services**

The bank's performance in this AA is adequate. There is only one branch office in the AA. It is located in a middle-income CT. Retail banking services offered are consistent with those offered throughout all of the other AAs. There were no community development services specifically attributed to this AA. However, bankwide Community Development services such as small business seminars, FHOP workshops, and free social security check cashing services are performed within the AA. Community development opportunities are further limited by the absence of LMI CTs and the rural environment of the area.

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and the 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						
HMDA and small business reportable loan data; consumer	January 1, 1997 to December 31, 1998					
Community development loans, investments, and services.	April 1, 1997 te	o March 30, 1999				
Financial Institution		Products Re	viewed			
First National Bank of Pennsy Hermitage, PA	lvania	Mortgage Loans, smal community develog investme	oment loans,			
Affiliate(s)	Affilia	te Relationship	Products Reviewed			
NA						
List of Assessmer	It Areas and Ty	pe of Examination				
Assessment Area	Type of	Branches Visited	Other			
Assessment Area	Examination	l	Information			
Pennsyvania						
SMSA	Full Scope	Hermitage, PA				
EMSA	Full Scope	None				
Lawrence County Non-MSA	Full Scope	None				
Crawford/Venango Non-MSA	Limited Scop					
Butler MSA	Limited Scop	e None				
Ohio						
YWMSA	Full Scope	None				

Ratings and Bank Name					
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating	
FNB of PA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory	
State					
Pennsylvania	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory	
Ohio	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory	

\* The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Market Profiles for Areas Receiving Full-Scope Reviews				
State of Pennsylvania	-	37		
State of Ohio		39		

## **State of Pennsylvania**

FNB designates six assessment areas (AAs), three of which are Metropolitan Statistical Areas (MSAs) and three which are Block Number Areas (BNAs). This examination's full scope review includes the Sharon-Mercer MSA - 7610 (SMSA), the Erie MSA - 2360 (EMSA), and the Lawrence County non-MSA.

FNB purchased a branch in Trumbull County, Ohio in 1997. This branch is FNB's only presence in Ohio and includes an assessment area (AA) limited to two middle income CT's. A separate discussion on the State of Ohio can be found following this section.

	% of CT/BNAs in Areas	Updated Median Family Income	Median Housing Age	Population	Owner Occupied Housing Units	Census Median Family Income
AA	100%	36,937	44 years	479,496	127,118	30,464
Mercer	26%	35,100	45 years	121,003	34,184	29,347
Erie	56%	39,100	44 years	276,000	69,705	32,145
Lawrence	17%	35,200	47 years	71,931	20,137	28,934

The table below details full scope AA information for each county.

The AAs meet regulatory guidelines and do not arbitrarily exclude any low- and moderate-income (LMI) individuals and/or geographies. FNB's AA does not reflect any conspicuous geographical gaps. The combined population in the three AAs reviewed is approximately 480,000. Assessment area demographics are reflected in the table below. Twenty-nine, or 23%, of the CTs and BNAs are designated LMI. Mercer and Erie Counties account for 76% of these LMI CTs.

Low	Moderate	Middle	Upper
		36	

	#	%	#	%	#	%	#	%	Total #'s
Mercer	3	9 %	3	9%	24	75%	2	6%	32
Erie	5	7 %	11	16%	42	61%	11	16%	69
Lawrence	1	5 %	6	<b>28</b> %	12	57%	2	10%	21
TOTAL	9	14%	20	6%	78	2%	15	8%	122

Source: 1990 Census Bureau

The table below details reported business information for individual AAs.

	Total Number of Reporting Businesses	£ \$1 Million	> \$1 Million	Income Not Reported
Mercer	328	234	42	52
Erie	903	540	127	236
Lawrence	2,106	1,565	189	352
Totals	3,337	2,339	\$359.00	640

Source: Dun and Bradstreet Business Demographics

### Mercer

Mercer County lies on the Pennsylvania/Ohio border and has a population of approximately 121,000. The major employers in Mercer County are manufacturing and HVAC suppliers; an area correctional facility; and county government. In recent years, the county has moved away from the steel and heavy equipment industry and gravitated more towards high technology, health care and tourism businesses. In 1994, a large outlet mall opened in the Grove City area.

Throughout Mercer County, there are 328 reported businesses of which 234 report earnings of \$1 million and less. Unemployment in the county is currently at 3.8%, which is less than the state average of 4.5% and national average of 4.6%. According to the "Places Rated Almanac," Mercer County ranks 8<sup>th</sup> in housing costs and 59<sup>th</sup> in cost of living.

### Erie

Erie County, located on the north shore of Lake Erie at the crossroads of I-90 and I-79, is virtually equidistant between Pittsburgh, PA., Cleveland, OH., and Buffalo, NY. It is the largest geographical AA for FNB, and has a population of approximately 276,000. Major employers in the county include a large utility corporation, medical facilities, insurance groups, and specialty plastics companies. Erie County has a strong manufacturing base, which accounts for roughly 30% of the local employment, compared to 20% for the state and nation. Manufacturers also account for nearly 50% of wages paid in the county. In addition, Erie County exports more per capita than any other

Pennsylvania county.

Unemployment remains the same as the state and national average at 4.5%. Throughout Erie County there are 903 reported businesses, of which 540 report earnings of \$1 million and less. Downtown infrastructure and waterfront development continues to take priority. Numerous expansion projects are underway with more such projects planned.

# Lawrence

Lawrence County is a rural area located on the Pennsylvania/Ohio border, approximately one hour north of Pittsburgh, PA. The county seat is New Castle with a population of just over 26,000. The next largest city in the county is Ellwood City with about 8,000 residents. Principal businesses include retail, food service, health care, and specialty steel and plastics service industries.

According to current labor market information, unemployment for the county is approximately 4.9% and is higher than the state average of 4.6%. This is due in large part to decreases in the labor force and in the number of unemployed and not to any type of economic expansion. New Castle's unemployment is higher at 5.5%. Several local business and economic development groups were developed to provide low cost financing and loan guarantees to help attract new businesses to the area. However, instability within the local political factions impedes the progress of small business and housing programs.

Of the 94,000 people in Lawrence County, almost 23,000 are under 18 years old while 18,000 are over 65 years old. The median age for the county is over 35 years of age. Lawrence County had over 2,100 reporting businesses for the entire county. Of these, almost 1,600 had revenues of under \$1 million.

# State of Ohio

FNB designates one assessment area in Ohio, which is within the Youngstown-Warren, Ohio MSA - 9320 (YWMSA). The bank designates two CTs in the YWMSA. This MSA is referred to in the evaluation as Trumbull County. FNB purchased this branch from an affiliate bank in 1997 to better serve its customers across the river in neighboring Sharon, PA. Economic and geographic ties are typical in cases where towns border a river that defines state boundaries. Given the bank's dominant presence in Pennsylvania and the lack of state recognition in the bank's name, customer activity is limited primarily to the bank's Pennsylvania customer base.

The table below details full scope AA information for Trumbull.

% of	Updated	Median	Population	Owner	Census
CT/BNAs i	Median	Housing		Occupied	Median

	Areas	Family Income	Age		Housing Units	Family Income
AA	100%	36,937	44 years	479,496	127,118	30,464
Trumbull	1%	40,300	40 years	10,562	3,092	30,605

The AA meet regulatory guidelines and do not arbitrarily exclude any low- and moderateincome (LMI) individuals and/or geographies. FNB's AA does not reflect any conspicuous geographical gaps. The bank's State of Ohio presence is limited to middle income geographies.

The table below details reported business information for the AA.

	Total Number of Reporting Businesses	£ \$1 Million	> \$1 Million	Income Not Reported
Trumbull	275	192	23	60

Source: Dun and Bradstreet Business Demographics

Trumbull County is a predominately rural area that does not benefit from targeted state economic development programs. It is geographically situated in close proximity to Sharon, PA and is relatively inaccessible to larger towns and cities in Ohio. The area's economic base is predominately light manufacturing and industrial, and service. Unemployment mirrors the western Pennsylvania market at approximately 4%.

# Appendix D: Tables of Performance Data

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State of Ohio	 62

#### Content of Standardized Tables

A separate set of tables is provided for each state. 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: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated and purchased of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area.

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 reportableloans originated and purchased by the bank over the evaluation period byMSA/assessment area.

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 rank and 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 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 rank and market share information based on the most recent aggregate market data available.

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 rank and market share information based on the most recent aggregate market data available.

Table 7.Borrower Distribution of Home Purchase Loans - Compares the percentagedistribution 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 MSA/assessment area. The table also presents market rank and 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 thousand) 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 MSA/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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 14. Geographic and Borrower Distribution of Consumer Loans - 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 the population 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 MSA/assessment area.

# Table 1

#### State of Pennsylvania

#### Table 1. Lending Volume

#### Charter Number: 249

LENDING VOLUME	State: Pen	nsylvania	Evaluation Peri	iod: January	y 1, 1997 to Dee	cember 31,	1998					
MSA /AA	% of Total	Home	Mortgage	Small	Business	Smal	l Farms		nunity .opment		Reported oans	% of Total
	FNB Deposits in Rated Area	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	reported FNB Loans in Rated Area
Full Scope:												
Mercer County MSA	47	2,391	104,913	454	55,433	NA	NA	3	2,975	2,848	163,321	53.4
Erie County MSA	22	888	44,237	366	46,814	NA	NA	0	0	1,254	91,051	17.4
Lawrence County AA	13	356	16,618	133	13,640	NA	NA	1	4,150	490	34,408	6.8
Limited Scope:												
Crawford/Venango County	17	1,234	47,237	349	33,498	NA	NA	0	0	1,583	80,735	22
Butler County MSA	1	23	1,351	3	146	NA	NA	0	0	26	1,497	. 4

	Low I Geogra	ncome aphies	Inc	erate come aphies	Middle Geogra	Income aphies		Income aphies	Over all Market	M	arket Sh	are by (	Geograph	Y*	Pur	l Home chase bans
MSA /AA	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	Rank*	Over all	Low	Mod	Mid	Upper	#	% of Total
Full Scope:																
Mercer County MSA	2.37	2.22	5.93	6.67	86.68	82.78	5.03	8.33	1	23.49	52.63	35.8 0	22.06	26.92	720	49.3
Erie County MSA	2.11	4.29	10	15.02	67.68	54.51	20.22	26.18	9	3.04	9.52	4.68	2.78	2.57	233	16.0
Lawrence County AA	1.63	0	14.01	4.95	71.97	80.20	12.39	14.85	4	7.55	0	0	9.20	6.19	101	6.9
Limited Scope:																
Crawford/Venango County	NA	NA	6.54	10.67	91.20	87.84	2.27	1.49	2	16.31	NA	21.8 2	15.82	10.71	403	27.6
Butler County MSA	NA	NA	NA	NA	98.58	100	1.42	0	0	0	NA	NA	0	0	2	.2

# Table 2. Geographic Distribution of Home Purchase Loan Originations

# Table 3. Geographic Distribution of Home Improvement Loan Originations

	Low I Geogra		Inc	rate ome aphies	Middle Geogra		Upper Geogra		Over all Market	Μ	larket Sh	are by G	eography	*	Impro	l Home ovement oans
MSA /AA	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	Rank*	Over all	Low	Mod	Mid	Upper	#	% of Tota
Full Scope:																
Mercer County MSA	2.37	2.08	5.93	6.72	86.68	84.96	5.03	6.24	1	36.29	38.46	41.67	35.42	42.11	625	50.
Erie County MSA	2.11	3.10	10	13.27	67.68	64.16	20.22	19.47	5	9.32	8.57	10.83	8.19	12.44	226	18.
Lawrence County AA	1.63	2.06	14.01	5.15	71.97	73.20	12.39	19.59	3	12.26	0	0	14.85	15.15	97	7.
Limited Scope:																
Crawford/Venango County	NA	NA	6.54	12.76	91.20	86.55	2.27	.69	3	18.05	NA	18.57	18.72	0	290	23.
Butler County MSA	NA	NA	NA	NA	98.58	100	1.42	0	3	5.17	NA	NA	5.36	0	4	•

# Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

	Low I Geogra	ncome aphies	Inc	rate ome aphies	Middle Geogra		Upper Geogra		Over all Market Rank*	M	larket Sh	are by G	Jeography	*	Mort Refi	l Home tgage nance ans
MSA /AA	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans		Over all	Low	Mod	Mid	Upper	#	% of Tota
Full Scope:																
Mercer County MSA	2.37	1.15	5.93	4.59	86.68	86.81	5.03	7.46	1	25.85	11.11	23.23	26.32	29.55	1,046	47.
Erie County MSA	2.11	1.63	10	9.79	67.68	60.84	20.22	27.74	4	6.74	8.47	6.99	6.91	6.03	429	19.
Lawrence County AA	1.63	.63	14.01	5.06	71.97	68.35	12.39	25.95	1	11.70	0	0	12.61	17.58	158	7.
Limited Scope:	NA	NA	6.54	11.83	91.20	87.62	2.27	. 55	2	19.10	NA	28.57	18.39	3.7	541	24.
County Butler County MSA	NA	NA	NA	NA	98.58	100	1.42	0	3	6.31	NA	NA	6.6	0	17	. 8

# Table 5. Geographic Distribution of Small Business Loan Originations

	Low In Geogra		Moderate Geograg		Middle : Geograj		Upper I Geograj		Over all Mrkt Rank	Μ	arket Sh	are by G	eography	*	St Bus	otal mall siness oans
MSA/ AA	% of Bus- inesses	% FNB Loans	*	Over all	Low	Mod	Mid	Upper	#	% of Tota						
Full Scope:																<u>.</u>
Mercer County MSA	9.5	11.9	8.1	5.9	72.3	74	10.1	8.1	1	21.30	24.71	22.22	20.93	20.24	454	34.
Erie County MSA	10.7	7.9	12.9	10.9	59.2	55.2	19.1	26	б	4.96	3.89	2.33	5.17	6.07	366	28.
Lawrence County AA	3.9	0	25.2	. 8	51.1	70.7	19.7	28.6	19	1.38	0	4.28	1.19	.73	133	10.2
Limited Scope	2:															
Crawford/ Venango County	NA	NA	23.2	35.8	74.6	61.3	2.3	2.9	19	1.38	NA	4.28	1.19	.73	349	26.
Butler County MSA	NA	NA	NA	NA	98	100	2	0	57	.06	NA	NA	.04	.02	3	. 2

(\*) Based on 1997 Aggregate Small Business Data only.

# Table 6. Geographic Distribution of Small Farm Loan Originations

	Low In Geogra		Moderate Geograp		Middle Geogra		Upper I Geograj		Over all	Ν	Market Sh	are by G	Beography	*		'otal l Farm
MSA/ AA	% of Farms	% FNB Loans	% of Farms	% FNB Loans	% of Farms	% FNB Loans	% of Farms	% FNB Loans	Mrkt Rank *	Over all	Low	Mod	Mid	Upper	#	% of Tota
Full Scope:						-		-	-			-	-	-	-	_
Mercer County MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Erie County MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lawrence County AA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Limited Scope	2:															<u> </u>
Crawford/ Venango County	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Butler County MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NZ

(\*) Based on 1997 Aggregate Small Farm Data only.

Borrow	come vers	Moderate Borrow		Middle I Borrow		Upper I: Borrow		Over all Mrkt	Marke	et Share	by Borr	ower Inc	ome**	Pur	al Home rchase oans
% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	Rank **	Over all	Low	Mod	Mid	Upper	#	% of Tota
17.47	8.19	19.55	16.67	25.17	25	37.81	48.75	1	23.49	35.16	25.88	22.70	28.21	720	49.3
18.77	9.87	18.22	21.46	24.90	25.67	38.11	99	9	3.04	7.11	2.78	2.96	3.61	233	16
20.32	5.94	20.22	17.82	23.63	20.79	35.83	54.46	4	7.55	3.92	10.10	5.63	10.04	101	6.9
e:															
19.73	10.17	20.79	20.10	23.63	28.29	35.86	41.44	2	16.31	22.67	19.89	19.41	18.45	403	27.6
20.21	0	17.99	50	24.42	0	37.38	50	0	0	0	0	0	0	2	. 2
	<pre>% of Families 17.47 18.77 20.32 0e: 19.73</pre>	%         %           of         FNB           Loans         *           17.47         8.19           18.77         9.87           20.32         5.94	%         %         %           of         FNB         of           Families         Loans         Families           17.47         8.19         19.55           18.77         9.87         18.22           20.32         5.94         20.22                19.73         10.17         20.79	%         %         %         %         %         %         %         %         %         FNB         of         FNB         Loans         *	%         %	%         %	%       %	%       %	%         %	%         %	Nrkt       Mrkt         %	Normal State         Normal State         Markt State         Markt State	Normalize         Normalize <t< td=""><td>Number of stress of str</td><td>k <math>k</math> <math>k</math></td></t<>	Number of stress of str	k $k$

#### Table 7. Borrower Distribution of Home Purchase Loan Originations

(\*) As a percentage of loans with borrower income information available. No information was available for 1.29% of loans originated by FNB.

Table 8.	Borrower	Distribution	of	Home	Improvement	Loan	Originations
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MSA /AA	Low Ind Borrow		Moderate Borrow		Middle I Borrow		Upper I Borrow		Over all Mrkt	Mark	et Share	by Borr	ower Inc	ome**	Impr	al Home ovement oans
MSA /AA	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	Rank **	Over all	Low	Mod	Mid	Upper	#	% of Total
Full Scope:									•		•	•			•	
Mercer County MSA	17.47	8.80	19.55	16.80	25.17	22.56	37.81	50.08	1	36.29	37.10	32.17	32.28	39.04	625	50.3
Erie County MSA	18.77	11.06	18.22	20.35	24.90	29.20	38.11	38.05	5	9.32	8.74	13.53	8.51	8.57	226	18.2
Lawrence County AA	20.32	12.37	20.22	18.56	23.63	26.80	35.83	42.27	3	12.26	5	10	13.48	15.79	97	7.8
Limited Scop	e:															
Crawford/ Venango County	19.73	8.28	20.79	16.55	23.63	30.34	35.86	44.14	3	18.05	13.46	20.19	18.79	17.70	290	23.4
Butler County MSA	20.21	25	17.99	0	24.42	50	37.38	25	3	5.17	20	0	9.9	4	4	.3

(\*) As a percentage of loans with borrower income information available. No information was available for 1.29% of loans originated by FNB.

## Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

	Low Ind Borrow		Moderate Borrow		Middle I Borrow		Upper In Borrow		Over all Mrkt Rank	Mark	et Share	by Borro	ower Inc	ome**	Mor Ref	al Home tgage inance oans
MSA /AA	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	**	Over all	Low	Mod	Mid	Upper	#	% of Tota
Full Scope:																<del></del>
Mercer County MSA	17.47	6.69	19.55	15.01	25.17	25.05	37.81	51.15	1	25.85	22.52	24.05	29.72	27.37	1,0 46	47.
Erie County MSA	18.77	8.62	18.22	13.52	24.90	26.81	38.11	50.12	4	6.74	10.88	7.71	6.27	7.33	429	19.
Lawrence County AA	20.32	3.80	20.22	16.46	23.63	20.25	35.83	58.23	1	11.70	11.43	13.04	7.75	15.67	158	7.2
Limited Scop	e:															<u> </u>
Crawford/ Venango County	19.73	8.5	20.79	17.19	23.63	26.06	35.86	47.32	2	19.10	18.57	22.04	18.05	20.89	541	24.
Butler County MSA	20.21	5.88	17.99	17.65	24.42	17.65	37.38	58.82	3	6.31	0	5.88	6.25	8.33	17	. 8

(\*) As a percentage of loans with borrower income information available. No information was available for 1.29% of loans originated by FNB.

#### Table 10. Borrower Distribution of Small Business Loan Originations

	Business wit	h Revenues or less	of \$1 million	Loans by Or	iginal Amount r Business Size	regardless of	Market	Share****	Total	Small Busine	ess Loans
MSA /AA	% of Businesses*	% FNB Loans**	% Market Loans ***	\$100,000 or Less	>\$100,00 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Siz
Full Scope:		L			1			<b>I</b>		-	L
Mercer County MSA	75.5	72.2	45.2	73.3	14.1	12.6	21.3	32.78	454	34.8	73
Erie County MSA	69.2	69.4	48.2	67.2	18.6	14.2	4.96	6.9	366	28.1	95
Lawrence County AA	74.4	78.2	61.2	72.9	16.5	10.5	1.38	1.69	133	10.2	95
Limited Scope	2:										
Crawford/ Venango County	74.1	74.5	61.2	77.1	13.2	9.7	1.38	1.69	349	26.7	76
Butler County MSA	80.7	100	44	100	0	0	.06	.03	3	.2	77

(\*\*) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by FNB.

(\*\*\*) The market consists of all other Small Business reporters in FNB's assessment area and is based on 1997 Aggregate Small Business Data only.

(\*\*\*\*) Based on 1997 Aggregate Small Business Data only.

### Table 11. Borrower Distribution of Small Farm Loan Originations

	Farms with F	Revenues of less	\$1 million or	Loans by Or	iginal Amount : Farm Size	regardless of	Market	Share****	Tota	al Small Farr	n Loans
MSA /AA	% of Farms*	% FNB Loans**	% Market Loans ***	\$100,000 or Less	>\$100,00 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Siz
Full Scope:				**       \$100,000 or Less       >\$100,000 \$250,000       >\$250,000 to \$1,000,000       All million or less       Rev \$1 million or less       #       % of Total         /A       NA       NA       NA       NA       NA       NA       NA         /A       NA       NA       NA       NA       NA       NA       NA       NA							
Mercer County MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Erie County MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lawrence County AA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Limited Scop	e: NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Venango County											
Butler County MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
				E A1	1		perce	ntage (	of all	farms	
(*)							_	_			
(*) (**)							_	_			e of

(\*\*\*) The market consists of all other Small Farm reporters in FNB's assessment area and is based on 1997 Aggregate Small Farm Data only.

(\*\*\*\*) Based on 1997 Aggregate Small Farm Data only.

#### Table 12. Qualified Investments

	Pr	ior Period Inves	tments*	Curren	t Period Investm	ents		Total Inves	tments
	#	\$ (000′s)	8**	#	\$ (000's)	8**	#	\$ (000's)	% of Total \$':
MSA /AA									
'ull Scope:									
Mercer County MSA	1	531	54	12	488	46	13	1,009	51
Erie County MSA	0	0	0	8***	311	100	8	311	16
Lawrence County AA	0	0	0	5	115	100	5	115	6
imited Scope:									
Crawford/Venango County	1	166	40	2	252	60	3	418	22
Butler County MSA	0	0	0	0	100	100	0	100	5

(\*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(\*\*) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

(\*\*\*) A \$1 million investment allocation based on the qualified investment's mortgage loans within individual AA's. Distributed per allocation by dollar amounts among the AA's. Volume (1) is included in the Erie AA as this is the largest allocation of the investment among FNB's AA's.

#### Table 13. Distribution of Branch and ATM Delivery System

	Deposits			Branche	es					ATMs					Popu	lation	
	00	#	% of	Loc	ation of	Branche	es by	#	00	Loca	ation c	of ATMs	by	% of	the Pop	ulation	within
	of Total	of FNB	Total	In	come of	Geograph	ies	of	of	Incor	ne of G	leograph	nies		Each G	eography	
MSA /AA	FNB Deposits	Branches	FNB Branches	Low	Mod	Mid	Upp	FNB ATMs	Total FNB ATMs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope:																	
Mercer County MSA	47	14	39	7%	14%	72%	7%	12	40	0%	0%	75%	25%	3.61	8.14	83.71	4.54
Erie County MSA	22	9	25	11%	22%	56%	11%	8	27	12%	12%	64%	12%	5.16	13.32	63.76	17.7
Lawrence County AA	13	4	11	0%	25%	0%	25%	4	13	0%	25%	50%	25%	3.49	16.33	68	12.1
Limited Sco	pe:																
Crawford/ Venango County	17	7	19	NA	0%	100%	0%	5	17	NA	0%	100%	0%	NA	8.82	87.88	3.30
Butler County MSA	1	1	3	NA	NA	100%	0%	2	7	NA	NA	100%	0%	NA	NA	78.05	21.9

			Geo	graphic	Distribu	tion					Bor:	rower Di	stributic	on				
		Income aphies		rate- ome aphies	Middle- Geogra			Income aphies	Low-In Borro		Moder Inco Borro	ome		-Income owers	Upper- Borr	Income owers	Tot Consu Loa	umer
MSA/ AA	% of Pop*	% FNB Lns	% of Pop*	% FNB Lns	% of Pop*	% FNB Lns	% of Pop*	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	#	% oi Tt
Full Sc	ope:															•		<u>.</u>
Mercer County MSA	3.61	3.73	8.14	7.98	83.71	84.28	4.54	4.02	4.30	14.59	7.96	22.17	83.21	24.94	4.53	35.92	1,786	4
Erie County MSA	5.16	4.49	13.32	14.29	63.76	63.29	17.76	17.94	5.35	19.10	14.04	23.75	62.76	22.43	17.86	33.55	602	1
Lawrence County AA	3.49	0	16.33	3.08	68	78.46	12.19	18.46	3.32	11.54	17.40	15.38	67.85	21.54	11.42	50	130	3
Limited	Scope	2:																
Crawford /Venango County	NA	NA	8.82	18.20	87.88	79.76	3.30	2.04	0	14.50	10.24	23.94	87.16	28.02	2.59	32.40	1,324	3
Butler County MSA	NA	NA	NA	NA	78.05	100	21.95	0	0	14.81	0	29.63	98.22	33.33	1.78	22.22	27	

# Table 14. Geographic and Borrower Distribution of Consumer Loan Originations (Auto)

			Geo	graphic	Distribu	tion					Bor	rower Di	stributic	n				
		Income aphies	Inc	rate- come aphies	Middle Geogra			Income aphies	Low-In Borro		Moder Inco Borro	ome	Middle- Borro		Upper-1 Borro	Income owers	Con	otal sumer bans
MSA /AA	% of Pop*	% FNB Lns	% of Pop*	FNB Lns	% of Pop*	% FNB Lns	% of Pop*	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	#	% of Ttl
Full Sc	-		1		1		-1											
Mercer County MSA	3.61	.51	8.14	2.53	83.71	88.38	4.54	8.59	4.30	2.53	7.96	8.08	83.21	21.72	4.53	63.64	198	37
Erie County MSA	5.16	1.72	13.32	6.9	63.76	53.45	17.76	37.93	5.35	4.31	14.04	6.9	62.76	16.38	17.86	71.55	116	22
Lawrence County AA	3.49	0	16.33	2.63	68	73.68	12.19	23.68	3.32	5.26	17.40	14.47	67.85	9.21	11.42	68.42	76	14
Limited	Scope	e:																
Crawford /Venango County	NA	NA	8.82	10.29	87.88	88.24	3.30	1.47	0	1.47	10.24	5.15	87.16	22.06	2.59	69.85	136	2
Butler County MSA	NA	NA	NA	NA	78.05	100	21.95	0	0	0	0	0	98.22	66.67	1.78	33.33	3	

# Table 15. Geographic and Borrower Distribution of Consumer Loan Originations (Home Equity)

geographies.

			Geo	ographic	Distrib	ution					Bor	rower Di	stributi	on				
		Income aphies	Moder Inc Geogra	ome	Middle Geogra			-Income aphies	Low-I Borro		Moder Inco Borro	ome	Middle- Borro		Upper-I Borro		Tota Consu Loai	umer
MSA /AA Full Sco	% of Pop* Ope:	% FNB Lns	% of Pop*	% FNB Lns	% of Pop*	% FNB Lns	% of Pop*	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	#	% of Ttl
Mercer County MSA	3.61	1.53	8.14	7.06	83.71	85.76	4.54	5.65	4.30	13.44	7.96	20.26	83.21	23.76	4.53	38.92	1629	46
Erie County MSA	5.16	2.65	13.32	10.46	63.76	61.72	17.76	25.17	5.35	14.17	14.04	18.94	62.76	23.58	17.86	42.12	755	23
Lawrence County AA	3.49	.83	16.33	5.42	68	75	12.19	18.75	3.32	13.75	17.40	16.67	67.85	19.17	11.42	45.42	240	7
Limited	Scope	2:																L
Crawford /Venango County	NA	NA	8.82	13.46	87.88	86.01	3.30	.54	0	15.72	10.24	23.25	87.16	25.40	2.59	34.55	929	2
Butler County MSA	NA	NA	NA	NA	78.05	100	21.95	0	0	12.90	0	16.13	98.22	29.03	1.78	38.71	31	1

# Table 16. Geographic and Borrower Distribution of Consumer Loan Originations (Personal Secured)

								•							.998			
			Geo	ographic	Distrib	ution					Bo	rower D	istributi	on				
		Income aphies	Moder Inc Geogra	ome		-Income aphies	Upper-: Geogra		Low-In Borrov		Moder Inco Borrc	ome	Middle- Borro		Upper-1 Borro		Tota Consu Loar	mer
MSA/AA Full Sco	% of Pop* Ope:	% FNB Lns	% of Pop*	% FNB Lns	% of Pop*	% FNB Lns	% of Pop*	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	% of Hshlds	% FNB Lns	#	% of Tt
Mercer County MSA	3.61	2.50	8.14	6.76	83.71	85.65	4.54	5.09	4.30	18.35	7.96	21.52	83.21	26.27	4.53	30.78	1,199	4
Erie County MSA	5.16	2.64	13.32	17.33	63.76	64.03	17.76	16.01	5.35	24.92	14.04	24.42	62.76	21.95	17.86	28.22	606	2
Lawrence County AA	3.49	0	16.33	.71	68	81.43	12.19	17.68	3.32	18.57	17.40	17.14	67.85	20.71	11.42	35	140	Ĩ
Limited	Scope	2:																
Crawford /Venango County	NA	NA	8.82	23.18	87.88	76.28	3.30	.53	0	23.29	10.24	25.64	87.16	25.53	2.59	24.89	936	3
Butler County MSA	NA	NA	NA	NA	78.05	94.44	21.95	5.56	0	22.22	0	16.67	98.22	22.22	1.78	38.89	18	

# Table 17. Geographic and Borrower Distribution of Consumer Loan Originations (Personal Unsecured)

# Table 2

# State of Ohio

# Charter Number: 249

#### Table 1. Lending Volume

MSA /AA	% of Total FNB	Home Mo	ortgage	Small	Business	Small	Farms		mmunity elopment		Reported oans	% of Total
	Deposits in Rated Area	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	reporte FNB Loar in Rate Area
'ull Scope:												
Trumbull County	100	62	4,007	21	3,190	NA	NA	0	0	83	7,197	100

# Table 2. Geographic Distribution of Home Purchase Loan Originations

	Low I: Geogra		Inc	erate come aphies	Middle Geogra	Income aphies		Income aphies	Over all Market	M	arket Sh	are by (	Geograph	У*	Pur	l Home chase cans
MSA /AA	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	Rank*	Over all	Low	Mod	Mid	Upper	#	% of Total
Full Scope:																
Trumbull County					100%	100%									13	100%

# Table 3. Geographic Distribution of Home Improvement Loan Originations

	Low I: Geogra	ncome phies		rate ome aphies	Middle Geogra		Upper Geogra		Over all Market	I	Market Sł	are by G	eography	<i>[</i> *	Impro	l Home ovement oans
MSA /AA	% Owner Occ	% FNB Loans	% Owner Occ	% FNB Loans	% Owner Occ	% FNB Loans	% Owner Occ	% FNB Loans	Rank*	Over all	Low	Mod	Mid	Upper	#	% of Tota
'ull Scope:	Units		Units		Units		Units									
Trumbull County					100%	100%									11	100

# Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

	Low I Geogra			rate ome aphies	Middle Geogra		Upper Geogra		Over all Market Rank*	Μ	larket Sh	are by G	eography	r *	Mort Refi	l Home gage nance ans
MSA /AA	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans	% Owner Occ Units	% FNB Loans		Over all	Low	Mod	Mid	Upper	#	% of Tota
Full Scope:		•				•		•	•			•				
Trumbull County					100%	100%									38	100

# Table 5. Geographic Distribution of Small Business Loan Originations

	Low In Geograj		Moderate Geograp		Middle : Geogra		Upper I Geograj		Over all Mrkt Rank	Μ	arket Sh	are by G	leography	*	St Bus	otal mall siness pans
MSA/	8	8	8	00	00	00	olo	8	*	Over	Low	Mod	Mid	Upper	#	8
AA	of Bus-	FNB	of Bus-	FNB	of Bus-	FNB	of Bus-	FNB		all						of
	inesses	Loans	inesses	Loans	inesses	Loans	inesses	Loans								Total
Full Scope:																
Trumbull County					100%	100%									21	100%
	1				1											

(\*) Based on 1997 Aggregate Small Business Data only.

# Table 6. Geographic Distribution of Small Farm Loan Originations

	Low In Geogra		Moderate Geograp		Middle Geogra		Upper I Geograj		Over all	Ν	larket Sh	are by G	Beography	/*		otal l Farms
MSA/ AA Full Scope:	% of Farms	% FNB Loans	% of Farms	% FNB Loans	% of Farms	% FNB Loans	% of Farms	% FNB Loans	Mrkt Rank *	Over all	Low	Mod	Mid	Upper	#	% of Total
Trumbull County					NA	NA									NA	NA

(\*) Based on 1997 Aggregate Small Farm Data only.

#### Table 7. Borrower Distribution of Home Purchase Loan Originations

	Borrow	ers	Borrow	Income ers	Middle I Borrow		Upper I: Borrow		Over all Market	Marke	et Share	е ру вот	rrower In	come^^	Pur	l Home chase oans
MSA /AA	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	Rank**	Over all	Low	Mod	Mid	Upper	#	% of Tota
full Scope	:															
Trumbull County	16.74	23.08	24.82	7.69	24.99	15.38	33.45	46.25	16	3.85	0	0	0	3.85	13	10

(\*) As a percentage of loans with borrower income information available. No information was available for 1.06% of loans originated by FNB.

### Table 8. Borrower Distribution of Home Improvement Loan Originations

	Low In Borrow		Moderate Borrow		Middle I Borrow		Upper I Borrow		Over all Market	Marke	et Shar	e by Borr	ower Inc	ome**	Impr	al Hom ovemen Loans
MSA /AA	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	Rank**	Over all	Low	Mod	Mid	Upper	#	% o: Tota
Full Scope	:	•		•		L		•				•	•			
Trumbull County AA	16.74	0	24.82	9.09	24.99	18.18	33.45	72.73	2	16.22	0	14.29	22.22	10	11	10

(\*) As a percentage of loans with borrower income information available. No information was available for 1.06% of loans originated by FNB.

## Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

	Borrow	come vers	Moderate 3 Borrow		Middle I Borrow		Upper 1 Borro		Over all Market Rank**	Mark	et Snare	by Borro	ower Inco	ome**	Mor Refi	l Home tgage inance bans
MSA /AA	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Families	% FNB Loans *	% of Familie s	% FNB Loans *		Over all	Low	Mod	Mid	Upper	#	% of Total
Full Scope	:			L			L	L	L	•						
Trumbull County	16.74	18.42	24.82	15.79	24.99	28.95	33.45	36.84	1	20.43	40	0	12.5	7.14	38	10

(\*) As a percentage of loans with borrower income information available. No information was available for 1.06% of loans originated by FNB.

#### Table 10. Borrower Distribution of Small Business Loan Originations

	Business with	Revenues of \$1 m	illion or less	-	Original Amou of Business S	nt regardless Size	Market	Share***	Total Sma	ll Busin	ess Loans
MSA /AA Full Scop	% of Businesses* e:	% FNB Loans**	% Market Loans***	\$100,000 or Less	>\$100,00 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loar Size
Trumbull County	69.8	88.9	58.6	72	5	23	2.29	.95	21	100	169

(\*) As a percentage of businesses with known revenues.

(\*\*) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by FNB.

(\*\*\*) The market consists of all other Small Business reporters in FNB's assessment area and is based on 1997 Aggregate Small Business Data only.

(\*\*\*\*) Based on 1997 Aggregate Small Business Data only.

#### Table 11. Borrower Distribution of Small Farm Loan Originations

	Farms with R	evenues of less	\$1 million or	Loans by Or	iginal Amount ı Farm Size	regardless of	Market	Share****	Tota	al Small Farr	n Loans
	8	olo	8	\$100,000	>\$100,00 to	>\$250,000	All	Rev \$1	#	8	Avg
	of Farms*	FNB	Market Loans	or Less	\$250,000	to		million		of Total	Loan Size
MSA /AA		Loans**	* * *			\$1,000,000		or less			
Full Scope:											
Trumbull County	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

(\*) Farms with revenues of \$1 million or less as a percentage of all farms.
(\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small farm loans. No information was available for 0% of loans originated by FNB.

(\*\*\*) The market consists of all other Small Farm reporters in FNB's assessment area and is based on 1997 Aggregate Small Farm Data only.

(\*\*\*\*) Based on 1997 Aggregate Small Farm Data only.

#### Table 12. Qualified Investments

	Prio	r Period Investme	ents*	Curre	ent Period Inves	stments		Total Inves	tments
	#	\$ (000's)	8**	#	\$ (000's)	8**	#	\$ (000's)	% of Total \$'s
MSA /AA									
full Scope:									
Full Scope: Trumbull County	NA	NA	NA	NA***	NA***	NA***	NA	NA	NA

(\*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(\*\*) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

(\*\*\*) A \$1 million investment was allocated pro rata by dollar among the PA AA's.

#### Table 13. Distribution of Branch and ATM Delivery System

	Deposits		Br	anches						AT	Ms				Pop	ulation		
	% of Total	# of FNB Branches	% of Total FNB Branches	Location of Branches by Income of Geographies				# of FNB	% of Total			of ATM Geogra	-	% of the Population within Each Geography				
MSA /AA	FNB Deposits			Low	Mod	Mid	Upp	ATMs	FNB ATMs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Sc	ope:		·					•										
Trumbull County	100	1	100	NA	NA	100%	NA	NA	NA	NA	NA	NA	NA	NA	NA	100	NA	

#### Table 14. Geographic and Borrower Distribution of Consumer Loan Originations (Auto)

			Geo	graphic	Distrib	ution				Borrower Distribution									
	Low-	Income	Mode	rate-	Mid	dle-	Upper-	Income	Low-Ir.	lcome	Moder	ate-	Middle-Income		Upper-Income		Т	otal	
	Geogr	aphies	Income		Ind	come	Geogr	aphies	Borro	wers	Inc	ome	Borrowers		Borrowers		Consumer		
			Geogr	aphies	Geogr	aphies					Borro	wers					L	oans	
MSA /AA	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	#	% (	
	Pop*	Loans	Pop*	Loans	Pop*	Loans	Pop*	Loans	Hshlds	Loans	Hshlds	Loans	Hshlds	Loans	Hshlds	Loans		Tot	
'ull Sc	ope:																		
rumbull	NA	NA	NA	NA	100	100	NA	NA	19.02	14.89	20.52	25.53	22.13	15.96	38.33	42.55	94	1(	

Table 15. Geographic and Borrower Distribution of Consumer Loan Originations (Home Equity)

			Geo	graphic	Distrib	ution			Borrower Distribution									
	Low-	Income	Mode	rate-	Mid	dle-	Upper-	Income	Low-In	lcome	Moder	ate-	Middle-	Income	Upper-	Income	Т	otal
	Geogr	aphies	Ind	come	Ind	come	Geogr	aphies	Borrow	wers	Inc	ome	Borro	wers	Borro	owers	Consumer	
			Geogr	aphies	Geogr	aphies					Borro	wers					L	oans
MSA /AA	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	#	8 0
	Pop*	Loans	Pop*	Loans	Pop*	Loans	Pop*	Loans	Hshlds	Loans	Hshlds	Loans	Hshlds	Loans	Hshlds	Loans		Tota
Full Sc	ope:																	
Trumbull	NA	NA	NA	NA	100	100	NA	NA	19.02	0	20.52	33.33	22.13	33.33	38.33	33.33	3	10

# Table 16. Geographic and Borrower Distribution of Consumer Loan Originations (Personal Secured)

			Geog	graphic I	Distrib	ution				Borrower Distribution									
	Low-	Income	Moderate-		Mid	dle-	Upper-	-Income	Low-Income		Moderate-		Middle-Income		Upper-Income		Т	otal	
	Geogr	aphies	Ind	come	Income		Geographies		Borro	wers	Inco	ome	Borro	wers	Borre	owers	Cor	nsumer	
			Geographies		Geographies						Borro	wers					L	oans	
MSA /AA	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	#	% of	
	Pop*	Loans	Pop*	Loans	Pop*	Loans	Pop*	Loans	Hshlds	Loans	Hshlds	Loans	Hshlds	Loans	Hshlds	Loans		Tota	
Full Sc	ope:																		
Trumbull County	NA	NA	NA	NA	100	100	NA	NA	19.02	16.90	20.52	19.72	22.13	18.31	38.33	38.03	71	100	

Table 17. Geographic and Borrower Distribution of Consumer Loan Originations (Personal Unsecured)

	Geographic Distribution											Borrower Distribution								
	Low-1	Income	Mode	rate-	Mid	dle-	Upper-	Income	Low-I	ncome	Moder	ate-	Middle-	Income	Upper-Income		Т	'otal		
	Geogr	aphies	Inc	ome	Ind	come	Geogra	aphies	Borro	wers	Inco	ome	Borrowers		Borrowers		Cor	nsumer		
			Geogr	aphies	Geogr	aphies					Borro	wers					L	oans		
MSA /AA																				
	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	% of	% FNB	#	% of		
	Pop*	Loans	Pop*	Loans	Pop*	Loans	Pop*	Loans	Hshlds	Loans	Hshlds	Loans	Hshlds	Loans	Hshlds	Loans		Tota		
Full Sco	ppe:																			
	-																			
Trumbull	NA	NA	NA	NA	100	100	NA	NA	19.02	34.38	20.52	15.63	22.13	28.13	38.33	18.65	32	100		
County																		1		
																		1		