

PUBLIC DISCLOSURE

September 8, 1997

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank: The Fifth Third Bank of Western Ohio.
#043949700000
One Dayton Centre
1 South Main Street
Dayton, Ohio 45402

Supervisory Agency: Federal Reserve Bank of Cleveland
P.O. Box 6387
Cleveland, Ohio 44101-1387

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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I. 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 The Fifth Third Bank of Western Ohio prepared by the Federal Reserve Bank of Cleveland, the institution's supervisory agency, as of September 8, 1997. The agency evaluates performance in assessment area(s) as they are delineated by the institution rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all, of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A of 12 CFR Part 228.

II. DESCRIPTION OF INSTITUTION

The Fifth Third Bank of Western Ohio ("FTBWO"), Dayton, Ohio, is a subsidiary of Fifth Third Bancorp, Cincinnati, Ohio ("Bancorp"). Other subsidiaries of Fifth Third Bancorp include banks in Ohio, Indiana, Kentucky, and Florida; Fifth Third Community Development Corporation; Fifth Third Investment Company; Fountain Square Insurance Company; and Money Station, an ATM network. Fifth Third Bancorp had total assets of \$20.1 billion as of March 31, 1997. FTBWO had total assets of \$2.1 billion as of June 30, 1997, which comprised 10% of Bancorp's total assets.

FTBWO is a full-service financial institution with a primary business focus on real estate, commercial, and consumer lending. Table 1 presents several key financial ratios for FTBWO.

Return on Average Assets	1.83%
Net Loans & Leases to Average Assets	51.02%
Investments to Average Assets	40.82%
Total Deposits to Average Assets	72.16%
Net Loans & Leases to Total Deposits	70.70%
1-4 Family Residential Loans to Average Loans	33.29%
Consumer Loans* to Average Loans	20.75%
Commercial Loans** to Average Loans	28.45%
Agricultural Loans to Average Loans	1.18%
Lease Financing Receivables to Average Loans	10.13%

* Includes loans to individuals and credit card loans.

** Includes commercial & industrial loans, commercial real estate loans, and construction & development loans

FTBWO's asset size and financial condition indicate that it has the ability to meet the credit needs of its assessment areas. There are no legal or other impediments which would hamper FTBWO's ability to meet the community's credit needs.

III. DESCRIPTION OF ASSESSMENT AREA

FTBWO has defined two assessment areas—the Miami Valley Ohio assessment area and the Lima Ohio assessment area. The Miami Valley Ohio assessment area consists of the Dayton-

Springfield Metropolitan Statistical Area ("MSA") 2000 which consists of Clark, Greene, Miami, and Montgomery Counties as well as adjoining non-MSA counties of Champaign, Darke, Logan, and Shelby. Also included is a portion of Warren County which is part of the Cincinnati, Ohio, Primary Metropolitan Statistical Area 1640 ("PMSA"). The Lima Ohio assessment area consists of the Lima MSA 4320 which includes Allen and Auglaize Counties and adjoining Hardin County which are not located in an MSA. The assessment areas comply with the requirements of the Community Reinvestment Act and do not arbitrarily exclude low- or moderate-income census tracts.

Tables 2a and 3a present relevant demographic information for the Miami Valley Ohio assessment area, while tables 2b and 3b present relevant demographic information for the Lima Ohio assessment area. The median family income for the Miami Valley Ohio assessment area is \$35,709 and \$32,583 for the Lima Ohio assessment area..

Miami Valley Assessment Area

Table 2a Demographic Data by Geography (Miami Valley)				
Type of Geography*	# and % of Geographies	# and % of Population	# and % of Families	# and % of O-O** Units
Low-Income	26 9.0%	67,547 5.9%	16,575 5.3%	9,701 3.3%
Moderate-Income	48 16.7%	182,039 15.9%	44,935 14.3%	35,166 12.1%
Middle-Income	150 52.1%	616,966 53.9%	171,650 54.7%	165,320 56.7%
Upper-Income	64 22.2%	277,733 24.3%	80,421 25.6%	81,631 28.0%
Total	288	1,144,285	313,581	291,818

* Geographies are classified as follows: low-income geographies have median family incomes less than 50% of the area median family income, moderate-income geographies have median family income from 50% to less than 80% of the area median family income, middle-income geographies have median family income from 80% to less than 120% of the area median family income, and upper-income geographies have median family income equal to or greater than 120% of the area median family income.

** Owner-occupied units.

Table 3a Demographic Data by Income Level (Miami Valley)		
Family Income Level*	Number of Families	% of Families
Low-Income	58,668	18.7%
Moderate-Income	55,528	17.7%

Middle-Income	76,492	24.4%
Upper-Income	122,893	39.2%
Below Poverty Level**	27,399	8.7%

* Family income levels are classified as follows: low-income families have median family incomes less than 50% of the area median family income, moderate-income families have median family income from 50% to less than 80% of the area median family income, middle-income families have median family income from 80% to less than 120% of the area median family income, and upper-income families have median family income equal to or greater than 120% of the area median family income.

** Subset of low-income families.

The Miami Valley assessment area has 461,391 housing units, of which 63.2% are owner-occupied, 30.8% are rental units, and 5.9% are vacant. One- to four-family units comprise 83.7% of the housing stock, while multi-family units of five or more comprise 12.3% and mobile homes comprise 3.3% of the remaining housing stock. The median housing value is \$63,105, median gross rent is \$392 per month, and 32.5% of the housing stock built prior to 1950.

The manufacturing, retail, and service industries employ the largest number of employees. Of the 26,377 establishments operating in the assessment area, the majority are small businesses, with 94% employing less than 50 employees, 6% employing between 50 and 499 employees, and a negligible number employing 500 or more employees.

The local economies are strong and are experiencing growth in employment. The unemployment rates in the counties comprising the assessment area range from 2.6% to 5.7% with an average unemployment rate of 4.1%. This rate is identical to the average unemployment rate for the State of Ohio of 4.1%.

Lima Ohio Assessment Area

Table 2b Demographic Data by Geography (Lima Ohio)				
Type of Geography*	# and % of Geographies	# and % of Population	# and % of Families	# and % of O-O** Units

Low-Income	4 7.5%	6,771 3.7%	1,591 3.2%	1,066 2.2%
Moderate-Income	9 17.0%	21,072 11.4%	5,389 10.8%	4,621 0.5%
Middle-Income	34 64.2%	136,243 73.5%	36,642 73.7%	36,841 75.8%
Upper-Income	6 11.3%	21,365 11.5%	6,087 12.2%	6,069 12.5%
Total	53	185,451	49,709	48,597

* Geographies are classified as follows: low-income geographies have median family incomes less than 50% of the area median family income, moderate-income geographies have median family income from 50% to less than 80% of the area median family income, middle-income geographies have median family income from 80% to less than 120% of the area median family income, and upper-income geographies have median family income equal to or greater than 120% of the area median family income.

** Owner-occupied units.

Table 3b Demographic Data by Income Level (Lima Ohio)		
Family Income Level*	Number of Families	% of Families
Low-Income	15,590	23.4%
Moderate-Income	10,896	16.4%
Middle-Income	13,512	20.3%
Upper-Income	26,638	40.0%
Below Poverty Level**	8,001	12.0%

* Family income levels are classified as follows: low-income families have median family incomes less than 50% of the area median family income, moderate-income families have median family income from 50% to less than 80% of the area median family income, middle-income families have median family income from 80% to less than 120% of the area median family income, and upper-income families have median family income equal to or greater than 120% of the area median family income.

** Subset of low-income families.

The Lima Ohio assessment area has 71,641 housing units, of which 67.8% are owner-occupied, 25.2% are rental units, and 7.0% are vacant. One- to four-family units comprise 85.5% of the housing stock, while multi-family units of five or more comprise 7.2% and mobile homes comprise 6.7% of the remaining housing stock. The median housing value is \$52,275, median gross rent is \$337 per month, and 39.6% of the housing stock built prior to 1950.

The manufacturing, retail, and service industries employ the largest number of employees. Of the 4,155 establishments operating in the assessment area, the majority are small businesses, with 95% employing less than 50 employees, 5% employing between 50 and 499 employees, and a negligible number employing 500 or more employees.

The local economies are stable and are experiencing growth in employment. The unemployment rates in the counties comprising the assessment area range from 3.8% to 5.4% with an average unemployment rate of 4.6%. This rate is somewhat higher than the average unemployment rate (4.1%) for the State of Ohio.

Table 4 details recent unemployment rates by county as compared with the state and national averages.

Table 4 Unemployment Rates as of July 1997	
State of Ohio	4.1%

Clark County	4.4%
Greene County	3.3%
Miami County	4.2%
Montgomery County	3.7%
Champaign County	4.6%
Darke County	5.7%
Logan County	3.4%
Shelby County	4.6%
Warren County	2.6%
Allen County	5.4%
Auglaize County	3.8%
Hardin County	4.6%
United States	5.0%

Two community contacts were conducted in conjunction with the examination. The community contacts included meetings with representatives from grass-roots community groups.

The primary needs identified as a result of these contacts included financing small business loans, providing funding for purchase and renovation of single and multi-family housing, offering home improvement loans, and providing education relating to banking and general business management to small business loan applicants.

IV. INSTITUTION RATING

This institution's CRA performance is rated outstanding.

The major factors and criteria contributing to this rating include:

- ! Excellent responsiveness to assessment area credit needs
- ! Excellent percentage of loans inside assessment area
- ! Excellent penetration of assessment area geographies

- ! Good distribution of loans throughout the assessment area
- ! Excellent penetration of loans among retail customers of different income levels and business customers of different sizes
- ! Excellent record of serving the credit needs of economically disadvantaged areas
- ! Leadership role in providing community development loans
- ! Leadership role in providing innovative and flexible lending practices
- ! Delivery systems accessible to essentially all of the assessment area
- ! Leadership role in providing qualified community development investments
- ! Leadership role in providing credit and community economic development needs

Table 5 indicates the performance level of FTBWO with respect to the lending, investment, and service test.

Table 5 FTBWO PERFORMANCE TESTS			
PERFORMANCE LEVELS	LENDING TEST*	INVESTMENT TEST	SERVICE TEST
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Lending Test

Lending Activity

FTBWO originated approximately 14,692 loans totaling approximately \$386 million within its two assessment areas since the previous examination. The majority of the lending activity is related to motor vehicles, home equity, consumer, home purchase and refinance, small business, and small farm and reflects a high level of responsiveness to the assessment area's credit needs.

Table 6 shows the number and amount of the bank's lending inside its two assessment areas by loan product.

Table 6				
Lending Within Assessment Area by Loan Product				
Loan Type	Number of Loans	% of Total Loans	Amount of Loans *	% of Total Loans
Home Improvement	817	97%	\$8,606	96%
Home Purchase	750	96%	\$51,893	97%
Multi-Family	5	100%	\$1,513	100%
Home Refinance	630	98%	\$41,114	94%
Motor Vehicle	2,720	94%	\$27,795	94%
Other Unsecured	1,134	98%	\$11,520	98%
Home Equity	875	95%	\$21,894	95%
Other Secured	920	96%	\$9,033	96%
Small Business	698	90%	\$104,559	86%
Indirect Motor Veh.	4,906	97%	\$59,632	90%
Small Business - RE	31	91%	\$3,921	97%
Small Farm	243	100%	\$10,025	100%
Total	13,729	93%	\$351,505	91%

* In thousands.

This table shows that a substantial majority of loans are within FTBWO's two assessment areas.

Geographic Distribution

FTBWO originated loans in all of the 341 geographies within its two assessment areas. Therefore, FTBWO is considered to have excellent penetration of geographies within its assessment area.

Tables 7a, 7b, and 7c show the number and amount of the bank's mortgage lending for both assessment areas and for the entire FTBWO assessment area in each category of geography as a percentage of the number and amount of total mortgage lending. Home purchase, refinance, and home improvement loans are compared to the percentage of owner-occupied units in each geography, while multi-family loans are compared to the percentage of multi-family units in each geography.

Table 7a (Miami Valley)				
Distribution of Mortgage Loans by Geography				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Home Purchase Loans *	0% 0%	9% 6%	70% 70%	20% 23%
Home Refinance Loans *	0% 0%	8% 5%	68% 67%	24% 28%
Home Improvement Loans *	1% 0%	19% 13%	52% 50%	28% 37%
Owner-Occupied Units **	3%	12%	57%	28%
Multi-Family Loans *	0% 0%	0% 0%	100% 100%	0% 0%
Multi-Family Units **	11%	20%	49%	20%

* Number and amount of mortgage loans as a percentage of total mortgage loans

** Percentage of total units

Table 7b (Lima Ohio)				
Distribution of Mortgage Loans by Geography				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Home Purchase Loans *	0% 0%	6% 4%	80% 79%	13% 17%
Home Refinance Loans *	1% 0%	4% 3%	83% 84%	12% 14%
Home Improvement Loans *	2% 1%	2% 1%	88% 88%	8% 10%
Owner-Occupied Units **	2%	9%	76%	13%

Multi-Family Loans *	0% 0%	0% 0%	0% 0%	100% 100%
Multi-Family Units **	14%	15%	63%	8%

* Number and amount of mortgage loans as a percentage of total mortgage loans

** Percentage of total units

Table 7c (FTBWO)				
Distribution of Mortgage Loans by Geography				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Home Purchase Loans *	0% 0%	9% 5%	73% 72%	19% 22%
Home Refinance Loans *	0% 0%	7% 5%	72% 71%	21% 25%
Home Improvement Loans *	1% 0%	17% 12%	57% 54%	25% 34%
Owner-Occupied Units **	3%	12%	59%	26%
Multi-Family Loans *	0% 0%	0% 0%	80% 93%	20% 7%
Multi-Family Units **	11%	19%	51%	19%

* Number and amount of mortgage loans as a percentage of total mortgage loans

** Percentage of total units

These tables show that FTBWO's geographic distribution of mortgage lending approximates the geographic distribution of owner-occupied and multi-family housing units in the assessment area.

Tables 8a, 8b, and 8c show the number and amount of the bank's small business and small farm lending for each assessment area and for the entire FTBWO assessment area in each category of geography as a percentage of the number and amount of total small business and small farm lending.

Table 8a (Miami Valley)				
Distribution of Small Business and Small Farm Loans by Geography				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income

Small Business, Real Estate *	0% 0%	8% 1%	73% 67%	19% 32%
Small Business, Other *	2% 6%	9% 9%	73% 68%	16% 16%
Small Farm *	0% 0%	1% 1%	82% 84%	17% 15%

* Number and amount of small business and small farm loans as a percentage of total small business loans

Table 8b (Lima Ohio)				
Distribution of Small Business and Small Farm Loans by Geography				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Small Business, Real Estate *	0% 0%	0% 0%	40% 20%	60% 80%
Small Business, Other *	4% 2%	3% 4%	82% 83%	11% 11%
Small Farm *	1% 1%	0% 0%	98% 99%	1% 0%

* Number and amount of small business and small farm loans as a percentage of total small business loans

Table 8c (FTBWO)				
Distribution of Small Business and Small Farm Loans by Geography				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Small Business, Real Estate *	0% 0%	6% 1%	68% 64%	26% 35%
Small Business, Other *	3% 6%	7% 8%	75% 71%	15% 15%
Small Farm *	0% 0%	0% 0%	88% 89%	11% 10%

* Number and amount of small business and small farm loans as a percentage of total small business loans

These tables show a reasonable distribution of small business and small farm loans among low- and moderate-income geographies compared with middle- and upper-income geographies.

Tables 9a, 9b, and 9c show the number and amount of the bank’s consumer lending in both assessment areas and for the entire FTBWO assessment area in each category of geography as a percentage of the number and amount of total consumer lending. Motor vehicle, other secured, and other unsecured loans are compared to the percentage of population in each geography, while home equity lines of credit are compared to the percentage of owner-occupied units in each geography.

Table 9a (Miami Valley)				
Distribution of Consumer Loans by Geography				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Motor Vehicle	1%	11%	63%	25%
Loans *	1%	10%	62%	27%

Other Secured Loans *	3%	8%	48%	41%
	2%	8%	39%	51%
Indirect Motor Vehicle Loans*	2%	12%	63%	23%
	2%	10%	60%	29%
Other Unsecured Loans *	0%	10%	79%	11%
	0%	7%	78%	15%
Population **	6%	16%	54%	24%
Home Equity Lines of Credit *	1%	7%	59%	33%
	1%	5%	49%	45%
Owner-Occupied Units **	3%	12%	57%	28%

* Number and amount of consumer loans as a percentage of total consumer loans

** Percentage of total population or owner-occupied units

Table 9b (Lima Ohio)				
Distribution of Consumer Loans by Geography				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Motor Vehicle Loans *	3%	6%	80%	12%
	2%	4%	81%	13%
Other Secured Loans *	2%	4%	85%	9%
	1%	2%	84%	13%
Indirect Motor Vehicle Loans*	2%	7%	79%	12%
	2%	7%	78%	13%
Other Unsecured Loans *	4%	7%	68%	21%
	2%	6%	68%	25%
Population **	6%	16%	54%	24%

Home Equity Lines of Credit *	1% 0%	3% 2%	85% 87%	11% 11%
Owner-Occupied Units **	3%	12%	57%	28%

* Number and amount of consumer loans as a percentage of total consumer loans

** Percentage of total population or owner-occupied units

Table 9c (FTBWO)				
Distribution of Consumer Loans by Geography				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Motor Vehicle Loans *	2% 2%	10% 9%	67% 65%	22% 24%
Other Secured Loans *	3% 2%	6% 6%	64% 55%	27% 38%
Indirect Motor Vehicle Loans*	2% 2%	11% 10%	66% 62%	21% 26%
Other Unsecured Loans *	1% 0%	10% 7%	78% 76%	12% 16%
Population **	6%	16%	54%	24%
Home Equity Lines of Credit *	1% 1%	6% 5%	64% 55%	29% 39%
Owner-Occupied Units **	3%	12%	57%	28%

* Number and amount of consumer loans as a percentage of total consumer loans

** Percentage of total population or owner-occupied units

Tables 9a, 9b, and 9c show that FTBWO's geographic distribution of consumer loans approximates the geographic distribution of population and owner-occupied units in low- and moderate-income geographies.

FTBWO's geographic distribution of loans reflects good penetration throughout the two assessment areas.

Borrower Distribution

Tables 10a, 10b, and 10c show the number and amount of the bank's mortgage and consumer lending for each assessment area and for the entire FTBWO assessment area in each category

of borrower income as a percentage of the number and amount of total mortgage and consumer lending. Lending percentages are compared to the percentage of population in each income category.

Table 10a (Miami Valley)				
Distribution of Consumer Mortgage Loans by Borrower Income				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Home Purchase Loans *	7% 4%	27% 18%	30% 29%	36% 49%
Home Refinance Loans *	6% 4%	18% 14%	28% 24%	47% 58%
Home Improvement Loans *	18% 11%	28% 26%	24% 23%	30% 40%
Population **	6%	16%	54%	24%

* Number and amount of mortgage and consumer loans as a percentage of total mortgage and consumer loans

** Percentage of total population

Table 10b (Lima Ohio)				
Distribution of Consumer Mortgage Loans by Borrower Income				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Home Purchase Loans *	7% 3%	29% 18%	30% 32%	34% 48%
Home Refinance Loans *	6% 4%	16% 11%	34% 32%	43% 53%
Home Improvement Loans *	12% 5%	31% 24%	25% 33%	32% 38%
Population **	4%	11%	74%	11%

* Number and amount of mortgage and consumer loans as a percentage of total mortgage and consumer loans

** Percentage of total population

Table 10c (FTBWO)				
Distribution of Consumer Mortgage Loans by Borrower Income				
Type of Loan	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Home Purchase Loans *	7% 4%	27% 18%	30% 29%	35% 49%
Home Refinance Loans *	6% 4%	18% 13%	30% 26%	46% 57%
Home Improvement Loans *	16% 9%	29% 26%	24% 25%	31% 40%
Population **	6%	15%	57%	22%

* Number and amount of mortgage and consumer loans as a percentage of total mortgage and consumer loans

** Percentage of total population

These tables show that FTBWO's borrower income distribution of mortgage and consumer lending exceeds the income distribution in the two assessment areas. Lending to low- and moderate-income borrowers exceeds the percentage of population in almost all loan categories. FTBWO's distribution of borrowers reflects excellent penetration among retail customers of different income levels.

Tables 11a, 11b, and 11c show the number and amount of small business and small farm loans for both assessment areas and for the entire FTBWO assessment area to businesses with less than \$1 million in annual revenues and the respective percentage of total small business and small farm loans.

Table 11a (Miami Valley)				
Small Business and Small Farm Loans With Revenues Less Than \$1 Million				
Type of Loan	Number of Loans	% of Total Loans	Amount of Loans*	% of Total Amount
Small Business	342	61%	\$34,775	41%
Small Bus. - RE	26	100%	\$3,622	100%
Small Farm	149	97%	\$5,685	90%

* In thousands

Table 11b (Lima Ohio)				
Small Business and Small Farm Loans With Revenues Less Than \$1 Million				
Type of Loan	Number of Loans	% of Total Loans	Amount of Loans*	% of Total Amount
Small Business	72	51%	\$4,700	24%
Small Bus. - RE	4	80%	\$223	75%
Small Farm	87	98%	\$3,415	91%

* In thousands

Table 11c (FTBWO)				
Small Business and Small Farm Loans With Revenues Less Than \$1 Million				
Type of Loan	Number of Loans	% of Total Loans	Amount of Loans*	% of Total Amount
Small Business	414	59%	\$39,475	38%
Small Bus. - RE	30	97%	\$3,845	98%
Small Farm	236	97%	\$9,100	91%

* In thousands

These tables show that the majority of FTBWO's small business and small farm loans are to businesses and farms with less than \$1 million in annual revenues. FTBWO's distribution of borrowers reflects excellent penetration among business customers of different revenue sizes in both assessment areas.

Tables 12a, 12b, and 12c show the number and amount of small business and small farm loans for both assessment areas and for the entire FTBWO assessment area by loan amount as a percentage of total small business and small farm loans.

Table 12a (Miami Valley)			
Small Business and Small Farm Loans by Loan Amount at Origination			
Type of Loan	Loan Amount ≤\$100,000	Loan Amount > \$100,000 ≤ \$250,000	Loan Amount > \$250,000

Small Business	62% 17%	22% 23%	16% 60%
Small Business RE	54% 18%	27% 25%	19% 57%
Small Farm	95% 70%	5% 23%	1% 7%

Table 12b (Lima Ohio)			
Small Business and Small Farm Loans by Loan Amount at Origination			
Type of Loan	Loan Amount ≤\$100,000	Loan Amount > \$100,000 ≤ \$250,000	Loan Amount > \$250,000
Small Business	60% 14%	28% 35%	12% 52%
Small Business RE	80% 65%	20% 35%	0% 0%
Small Farm	92% 66%	7% 27%	1% 7%

Table 12c (FTBWO)			
Small Business and Small Farm Loans by Loan Amount at Origination			
Type of Loan	Loan Amount ≤\$100,000	Loan Amount > \$100,000 ≤ \$250,000	Loan Amount > \$250,000
Small Business	62% 16%	23% 26%	15% 58%
Small Business RE	58% 21%	26% 26%	16% 53%
Small Farm	94% 69%	5% 24%	1% 7%

These tables show that FTBWO makes small business and small farm loans in varying

amounts, with a concentration of loans less than \$100,000 in both assessment areas.

Community Development Loans

FTBWO has originated a relatively high level of community development loans for both of its assessment areas. The bank originated \$5.2 million in community development loans since the previous examination. Table 13 shows the distribution of the number and amount of community development loans as a percentage by geography.

Table 13		
Distribution of Community Development Loans by Geography		
Type of Geography	Number of Loans (%)	Amount of Loans (%)
Low- and Moderate-Income	100%	100%

* Community development loans benefiting more than one type of geography

This table shows that all of FTBWO’s community development loans benefit low- and moderate-income geographies in addition to benefiting low- and moderate-income individuals as evidenced in Table 10.

The following is a partial listing of community development loans:

- ! Financing to Logan County Board of Mental Retardation/Developmental Disabilities for building construction costs which serves low- and moderate-income individuals.
- ! Loan financing to Champaign Residential Services, Inc., which provides group housing for low- and moderate-income mentally retarded and developmentally disabled individuals.
- ! Financing to Community Housing, Inc., which provides housing for low- and moderate-income severely mentally disabled individuals
- ! Financing to New Life Community Housing Association, Inc., which acquired and will rehab 16 residential apartment units in a multi-family building for low- and moderate-income individuals.
- ! Financing to Ecumenical Development Corporation to acquire and rehab two single-family homes for low- and moderate-income individuals.

- ! Building financing to Dr. Alan D. Janoff, D.D.S., who provides dental care for low-and moderate-income families.

Innovative/Flexible Lending Criteria

FTBWO extensively uses innovative and flexible lending criteria to enhance its ability to meet the credit needs within its two assessment areas. The following is a listing of these innovative and/or flexible lending programs. Several of these loan programs have been recently implemented by the bank and had not generated any loan volume as of the examination date. However, the lending volume of the established programs indicates the successful use of these programs.

- ! The Good Neighbor Mortgage Loan Program provides flexible, affordable home purchase loans for low- and moderate- income residents. The program features four options based upon property location, household income, and source of down payment. Flexible features include down payments as low as 3%, higher debt-to-income ratios, reduced closing costs, and a home buyer training course. Since the previous evaluation, 133 loans were originated for more than \$ 916,805.
- ! FHA and VA loans are government-guaranteed mortgage loans offering no or low down payment to qualified buyers. FTBWO refers all applicants for these types of mortgage loan programs to its Fifth Third Bank, Cincinnati affiliate office for loan processing.
- ! Rural Development Loans are mortgage loans designed to reach low- and moderate-income families. No down payment and no mortgage insurance is required, and this program offers expanded debt-to-income guidelines.
- ! PLUS and Stafford student loans are unsecured notes extended to post-secondary students for educational purposes. Loans made under the PLUS Loan Program help parents obtain a tuition loan on behalf of their dependent children. The Stafford Loan Program is available for those families who qualify under the need-based formula. No loan totals were available.
- ! The bank originates government-assisted business loans in conjunction with the Small Business Administration's ("SBA") 7A and 504 loan programs. No loan totals were available.
- ! The Good Neighbor Installment Loan Program provides flexible terms, reduced rates, no out-of-pocket costs, and a broader view of credit for home improvement, second mortgage, auto, and appliance loans. No loan totals were available.

- ! The Fresh Start Loan Program provides automobile loans for individuals who need special financing due to a less-than-satisfactory credit history or no credit history. No loan totals were available.
- ! Good Neighborhood Secured Credit Cards are secured by a Fifth Third Savings account for individuals trying to establish or re-establish credit history. No loan totals were available.
- ! FmHA Rural Housing programs that provide low- and moderate-income families in rural areas the opportunity to obtain affordable housing.

Investment Test

FTBWO makes investments and grants primarily through the Fifth Third Foundation and the Fifth Third Community Development Corporation (“CDC”), a subsidiary of Fifth Third Bancorp. CDC makes investments through low-income housing tax credits and small business venture capital equity funds.

The Foundation Office is a department of the Fifth Third Investment Advisors, a division of Fifth Third Bank of Cincinnati. The Foundation Office manages the Cincinnati bank’s charitable trust established from profits of the bank for the purpose of providing grants and contributions to community and neighborhood, health and human services, educational, and cultural organizations. The Foundation makes more than \$2 million in contributions from this trust annually. In addition to the bank’s charitable trust, the Foundation Office serves as sole trustee for several privately established trusts. In its fiduciary capacity, the bank has the opportunity to direct grants and contributions from these trusts to organizations that provide affordable housing and other community development services which benefit low- and moderate-income individuals and geographies.

Grants and contributions were made to organizations that provide money management education to young adults; home buyer education and counseling; youth mentoring services; community services; job skills and training; affordable housing; and small business development and incubator services. These qualified investments and grants totaled approximately \$1.4 million since the previous evaluation.

Fifth Third Community Development Corporation ("CDC") is a subsidiary of Fifth Third Bancorp. The CDC makes investments through low-income housing tax credits and small business venture capital equity funds. The CDC has funded \$4 million in low-income housing tax credits as of January 31, 1997, of a total commitment of \$12.6 million. The CDC has funded \$4.5 million in small business venture capital equity funds as of January 31, 1997, of a total commitment of \$9.7 million. These equity funds invest primarily in small businesses in the bank's assessment area but also include businesses within western Ohio.

FTBWO has an excellent level of qualified community development investments and grants for both assessment areas and has used innovative and complex investments to support community development initiatives for both assessment areas.

Service Test

Retail Banking Services

FTBWO's retail banking and alternative delivery systems are accessible to essentially all geographies within the bank's assessment area. Tables 14a and 14b show the bank's two assessment areas' distribution of branches and off-site ATMs by geography.

Table 14a (Miami Valley) Distribution of Branches by Geography						
Type of Geography	# of Branches	% of Branches	# of Off-Site ATMs	% of Off-Site ATMs	% of Total Population	% of Total Geographies
Low-Income	2	4%	0	0%	6%	9%
Moderate-Income	7	16%	0	0%	16%	17%
Middle-Income	23	51%	0	0%	54%	52%
Upper-Income	13	22%	0	0%	24%	22%

Table 14b (Lima Ohio) Distribution of Branches by Geography						
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Type of Geography	# of Branches	% of Branches	# of Off-Site ATMs	% of Off-Site ATMs	% of Total Population	% of Total Geographies
Low-Income	1	11%	0	0%	4%	8%
Moderate-Income	0	0%	0	0%	17%	17%
Middle-Income	6	67%	0	0%	74%	64%
Upper-Income	2	22%	0	0%	11%	11%

This table shows that 20% and 11%, respectively, of the bank's two assessment area branches are located in low- and moderate-income geographies which compares favorably to corresponding population of 22% and 21%, respectively. Analysis of the bank's office locations reveals that additional branches located in middle- and upper-income geographies are conveniently located to low- and moderate-income geographies.

Stand-alone branches offer business hours Monday through Saturday. In addition, the bank operates a 24-hour, seven-day-a-week Customer Service Call Center and Jeanie Telephone Banking Center which allows customers to open deposit accounts, apply for loans, make account inquiries, and pay bills. Customers also have the opportunity to open deposit accounts and apply for loans through advertisements, direct mailings, and "take-one" brochure displays. Business hours and services are reasonable and do not vary in ways that inconvenience certain portions of the two assessment areas.

Table 15 shows FTBWO's record of opening and closing branches for both its assessment areas since the previous evaluation.

Table 15		
Record of Opening and Closing Branches by Geography		
Type of Geography	# of Branches Closed	# of Branches Opened
Low-Income	0	0
Moderate-Income	0	0
Middle-Income	1	0
Upper-Income	1	0

This table shows that the number of branches in low- and moderate-income geographies remained the same. The bank's record of opening branches has not adversely affected the accessibility of its delivery systems for its two assessment areas.

Community Development Services

FTBWO provides community development services including education and savings programs for school students, technical assistance and educational services to small businesses, and home ownership counseling and seminars for both of its assessment areas. The following is a partial list of FTBWO's activities in providing these services:

- ! In conjunction with the Project Impact-Lima Area, FTBWO provided a series of financial skills workshops to low- and moderate-income individuals.
- ! Conducted home buyer training classes for low- and moderate-income individuals in Lima, Ohio.
- ! A financial skills program was provided by bank staff to schools located in low- and moderate-income census tracts.
- ! FTBWO conducted a Banking and Credit workshop in conjunction with Women's Financial Information Program for low-and moderate-income individuals.
- ! FTBWO, in conjunction with City of Lima's HOME Rental Rehabilitation Program, offered a 50% discount on current loan rates for Lima rental property owners as an incentive to rehabilitate rental units for low-income renters.

Appendix A

SCOPE OF THE EXAMINATION

Time Period Reviewed: 12/31/94 TO 09/08/97

Financial Institution: The Fifth Third Bank of Western Ohio, Dayton, Ohio

Products Reviewed: Home Improvement
Home Purchase
Multi-Family
Home Refinance
Motor Vehicle
Other Unsecured
Home Equity
Other Secured
Small Business
Small Farm
Small Business - Real Estate
Indirect Motor Vehicle

Assessment Area: The Fifth Third Bank of Western Ohio has defined two assessment areas—the Miami Valley Ohio assessment area and the Lima Ohio assessment area. The Miami Valley Ohio assessment area consists of the Dayton-Springfield Metropolitan Statistical Area ("MSA") 2000 which consists of Clark, Greene, Miami and Montgomery Counties as well as adjoining non-MSA counties of Champaign, Darke, Logan, and Shelby. Also included is a portion of Warren County which is part of the Cincinnati, Ohio, Primary Metropolitan Statistical Area 1640 ("PMSA"). The Lima Ohio assessment area consists of the Lima MSA 4320 which includes Allen and Auglaize Counties and adjoining Hardin County which are not located in an MSA. Both assessment areas were reviewed and evaluated on-site.