



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

**Community Development Investment Letter #2007-1
March 2008**

August 17, 2007

Mr. John Kratkoczki
Vice President
Park National Bank
1000 East 111th Street
Chicago, Illinois 60628

Dear Mr. Kratkoczki:

This letter responds to the after-the-fact notice from Park National Bank (the “Bank”) that we received on July 25, 2007. The Bank indicates that it made an investment of \$199,996 in the building located at 10433 S. Corliss Avenue (the “Property”) under the requirements of 12 USC § 24 (Eleventh) (the “Statute”) and 12 CFR Part 24 (the “Regulation”) concerning national bank community and economic development entities, community development projects, and other public welfare investments.

The Bank’s notice indicates that its investment in the Property primarily benefits low- and moderate-income individuals and areas in Chicago, Illinois. The purpose of the investment is to rehabilitate a single family row house.

The Bank attests that it is eligible to provide an after-the-fact notification, and that the investment complies with the public welfare and the investment limit requirements of §§ 24.3 and 24.4 of the Regulation. The aggregate amount of the Bank's outstanding investments and commitments under the Regulation may not exceed 5 percent of its capital and surplus without prior, written approval by the OCC. In no event may the aggregate amount of the Bank's outstanding investments and commitments under the Statute exceed 15 percent of its capital and surplus. If requested by the OCC, the Bank will provide reports concerning its Part 24 investment.

The response set forth in this letter is based on information and representations provided to us by the Bank. Any change in the nature, amount, or purpose of the Bank's investment could result in a different response being rendered concerning the conformance of the Bank’s investment with the Statute and the Regulation.

This response regarding the Bank's Part 24 investment and the activities, and communications by OCC employees in connection with this filing, does not constitute a contract, express or implied, or any other obligation upon the OCC, the U.S., or any agency or entity of the U.S., or an officer or employee of the U.S. This response does not affect the ability of the OCC to exercise its supervisory, regulatory, and examination authorities under applicable laws and regulations. The foregoing may not be waived or modified by any employee or agent of the OCC or the U.S.

If you have questions regarding this letter, please feel free to contact me at (202) 874-4930. You may also access general information about the national bank community development investment authority under Part 24 on <http://www.occ.treas.gov/cdd/pt24toppage.htm>.

Sincerely,

signed

Barry R. Wides
Deputy Comptroller
Community Affairs