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Comptroller of the Currency  
Administrator of National Banks

Large Bank

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## **Public Disclosure**

January 25, 1999

### **Community Reinvestment Act Performance Evaluation**

**The United National Bank and Trust Company  
Charter Number 14501  
220 Market Avenue  
Canton, Ohio 44701**

**Office of the Comptroller of the Currency  
Three Summit Park, Suite 530  
Independence, Ohio 44131**

**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 CRA performance of **The United National Bank and Trust Company** prepared by the **Comptroller of the Currency**, the institution's supervisory agency, as of **January 25, 1999**. 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 the 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 to 12 C.F.R. Part 25.

**Institution's CRA Rating:** This institution is rated **Satisfactory** record of meeting credit needs.

- ! majority of home mortgages originated within the assessment area;
- ! reasonable responsiveness to the home mortgage needs within the assessment area;
- ! low geographic distribution of home mortgage loans in low- and moderate- income areas; loans to low- and moderate- income areas are not comparable to the level of owner-occupied units in low- and moderate- income tracts;
- ! good geographic distribution of small business loans;
- ! low distribution of home mortgage loans to low- and moderate- income borrowers; reasonable distribution of loans to businesses with revenues of less than \$1 million;
- ! good level of community development lending activity;
- ! adequate level of investments; and lack of complex or innovative investments;
- ! good access to delivery systems, systems are reasonably accessible to all geographies and individuals of different income levels, including low- and moderate- income; and
- ! good level of community development services provided.

The following table indicates the performance level of **United National Bank and Trust Company**

with respect to the lending, investment, and service tests.

Performance Levels	Name of Financial Institution		
	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High satisfactory			X
Low satisfactory	X	X	
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.

## Description of Institution

The United National Bank and Trust Company (UNB) is headquartered in Canton, Ohio. On December 31, 1998 UNB had total assets of \$862 million.

UNB is an intrastate bank. Its primary market areas are the cities and surrounding areas of Canton and Massillon, both in Ohio. UNB assessment areas include four counties, all of Stark and Carroll Counties and portions of Summit and Wayne Counties. UNB has 21 full service offices and 29 automated teller machines (ATMs). The bank entered a new market and opened a branch in Wooster, Ohio in August 1998.

UNB is a wholly-owned subsidiary of UNB Corp, an \$869 million holding company. UNB Corp also owns a sub-prime lending affiliate and an insurance company. No affiliate lending is considered in this evaluation.

UNB provides a full range of retail and commercial bank products as well as trust services. This includes an array of residential mortgage, commercial, and consumer loans. The bank's primary lending focus is retail lending. As of December 31, 1998, UNB's total loans of \$673,956 include residential mortgages 36%, commercial real estate 12%, commercial loans 22%, and consumer loans 30%. The bank packages and sells a significant amount of fixed-rate home loans in the secondary market.

Competition is very keen in all of the bank's assessment areas. The bank competes with small community size institutions. However, large national banks (FirstMerit, Star Bank, and Bank One) and mortgage companies (United Companies Corp.) dominate the market.

The bank's CRA performance was rated Satisfactory in the previous public evaluation dated September 30, 1996. The bank was a \$748 million institution and has since grown 15%. Since the last CRA Evaluation, the bank has opened four branches and closed three. All branch activity occurred in middle- or upper- income census tracts.

There are no current financial impediments which would hamper UNB's ability to meet the credit needs of its communities.

## Description of Assessment Areas

The bank has identified three assessment areas which are detailed below. The assessment areas are consistent with CRA regulatory requirements. Low- and moderate- income areas are not arbitrarily excluded, and no evidence of illegal discrimination was noted in the compilation of the assessment areas.

The *Canton-Massillon (MSA 1320) Area* consists of 82 census tracts in the Canton-Massillon Ohio Metropolitan Statistical Area (MSA 1320). This area includes all of Stark and Carroll Counties. Of the 82 tracts, five are low- income, 15 are moderate- income, 51 are middle- income, and 11 are upper- income. UNB has 18 full-service branches and 27 ATMs in this assessment area. The Canton-Massillon Area is primarily urban interspersed with small rural areas like Hartville, Canal Fulton, and Nimishillen Township. The 1990 Census Bureau lists the population as 394,106. According to Dunn and Bradstreet, during 1998, there were 12,824 businesses, including 340 agricultural-related entities, located within this assessment area. Prominent industries are steel, consumer goods, manufacturing and health services. Major employers include Timken Industries, Diebold, Hoover Industries, and Aultman Hospital. As of December 1998, the Stark County unemployment rate of 3.7% is in line with the State of Ohio unemployment unadjusted rate of 3.8%, the Carroll County's unemployment is higher at 4.6%.

The Canton-Massillon assessment area contains all five, (100%), of the bank's low- income areas. It also contains all moderate- income areas. The City of Canton has been identified by the State of Ohio Department of Development as a distressed community. Canton contains four low- income census tracts. All are located in and around the downtown area. These low- income tracts contain 13,066 persons with 41.79% living below the poverty level. Total households in the tracts are 5,176. In addition, total housing units are 6,136, 27% are rental. Owner-occupied housing units represent 66% of the total housing units. Most (74%) of the housing stock consists of one-to-four family units. Average age of these units is 56 years and the average value is \$21 thousand. Rents in the area average \$200.

The City of Alliance contains one low- income tract in the downtown area. The tract contains 1,402 persons with 48.45% living below poverty level. The area has 803 housing units, 73% are rental. At least 66% of the housing stock is one-to-four family. Owner-occupied housing units represent 20% of the total housing units. Average age of these units is 52 years and the average value is \$21 thousand. Rents in the area average \$228.

Credit needs of the communities were ascertained through discussion with community groups. We contacted four representatives from economic development and affordable housing concerns in Canton, Alliance, and Massillon. Credit needs identified by the groups were similar. The most important needs include downtown revitalization of the City of Canton, affordable rehabilitation and home improvement loans, and a business incubator in Alliance.

The *Summit County Area* consists of six census tracts in the Akron Metropolitan Statistical Area (MSA 80). This area includes portions of Summit County. Of the six tracts, five are middle- income and one is upper- income. UNB has two branches and one ATM in this assessment area. Summit County is primarily urban. The 1990 Census Bureau lists the population as 35,321. According to Dunn and Bradstreet, during 1998, there were 1,122 businesses including 36 agricultural-related entities, located within this assessment area. Prominent industries are manufacturing and transportation. Major employers include B.F. Goodrich and Roadway Express. As of December 1998, the Summit County unemployment rate of 3.6% was lower than the State of Ohio unemployment unadjusted rate of 3.8%.

The *Wayne County Area* consists of eight block numbering areas (BNAs) in a Non-Metropolitan

Statistical Area. Five of the BNA's are middle- income and three are upper- income. UNB has one full-service branch and one ATM in the assessment area. The Wayne County area is primarily rural interspersed with urban areas like Wooster and Orrville. The 1990 Census Bureau lists the population as 30,144. According to Dunn and Bradstreet, during 1998, there were 3,345 businesses including 155 agricultural-related entities, located within this assessment area. Prominent industries are agricultural, light manufacturing, and oil and gas industries. Major employers include Rubbermaid Inc., The Wooster Brush Company, and J.M. Smucker Company. As of December 1998, the Wayne County area unemployment rate of 3.0% was lower than the State of Ohio unadjusted rate of 3.8%.

## **Conclusions with Respect to Overall Performance Tests**

The overall bank conclusions are based on UNB's performance in the Canton-Massillon Metropolitan Statistical area (MSA) 1320. This MSA contains the overwhelming majority of the bank's offices (85%), loans (96%), deposits (98%), and qualified investments (100%). As a result, the conclusions for the overall bank and the Canton-Massillon MSA are combined in this section. UNB's Lending, Investments and Services performance data are detailed in the Table Section which starts on page 15 of this Public Evaluation. The assessment areas of Summit and Wayne Counties are very small and contain only 2% of the bank's lending and deposit activity. These two assessment areas are referred to as limited scope areas and are not discussed in detail within this report. However, data for these areas are included in the Table Section of this Public Evaluation. The Wayne County Non-MSA assessment area was added to the bank's assessment area August 1998. Its data will be limited.

### Full Scope Review

This review covered the time period from January 1, 1997 to December 31, 1998 for all community development, investments, and services.

The analysis of Home Mortgage Disclosure Act (HMDA) loans is limited to those originated by UNB during 1998. During the examination, it was noted that the bank's HMDA data for 1997 and 1998 contained significant errors. UNB erroneously included loans that the bank initiated, packaged and sold, but did not make the credit decision. These loans should not be reported as originations by the bank. The bank could not correct the 1997 HMDA errors, therefore, an analysis of these loans was not performed. UNB's management corrected its 1998 HMDA errors and this data was analyzed and the results considered in this public evaluation. In addition, home-improvement loans are not included in this analysis. During the examination, it was noted that the bank's HMDA records for 1998 did not include any home-improvement loans.

The 1997 HMDA market data was not considered reliable due to errors contained in the bank's HMDA report. Therefore, 1997 HMDA market share information for geographic distribution and borrower characteristics analysis could not be performed.

The analysis of small business and small farm lending is based on 1997 data. The volume of small business lending for 1998 was similar to that of 1997. The detail on the bank's 1998 small business lending was not readily available to perform an in depth analysis. The bank had no small farm loans in 1998.

## **LENDING TEST**

The lending test is the most influential consideration in evaluating the bank's CRA performance. Home mortgage and small business lending were viewed equally in determining conclusions. Consideration is given to the bank's origination of credit within its assessment area; the extension of credit to low- and moderate- income areas within the assessment area; the level of credit provided to low- and moderate-income borrowers and small business and farms, and credit provided for community development.

It is important to note that aggregate market data for 1997 HMDA activity revealed that larger banks, such as Charter One and FirstMerit with a 7% and 5% market share, respectively, dominate the home loan market. In addition, UNB competes against an active community bank, Citizens National Bank which is the third largest lender in the area with a 4% market share.

During the review period, UNB processed 966 investor loans totaling \$90,865 million. A review of the geographic distribution and borrower characteristics of the investor loans to that of UNB revealed no significant differences in lending activity. This indicates that had these loans been included in this evaluation, they would not have significantly affected the overall rating.

## **Geographic Distribution of Loans**

UNB's geographic distribution of credit is reasonable. This conclusion is based on: 1) a significant majority of UNB's lending activity occurred within the assessment area; 2) penetration into all segments of the community was good as loans were made in nearly all tracts in the assessment area; 3) the proportion of business lending in low- and moderate- income segments of the community was good; and 4) the proportion of home mortgage lending to low- and moderate- income geographies was low, but reasonable given the low percent of owner-occupied units in the low- and moderate- income geographies within the assessment area.

During 1998, UNB originated a majority (83%) of the number of its home mortgages within this assessment area. The bank originated a total of 515 home mortgage loans. Of this amount, 426 were made in the assessment area. There were no conspicuous gaps in the distribution of the bank's lending. The bank originated loans in 90% of the geographies in the assessment area.

### Home Mortgage Loans

The level of HMDA loans made in low- and moderate- income tracts was significantly lower than the percentage of owner-occupied units in the areas.

UNB originated no home purchase loans in low- income tracts during 1998. The bank originated 6% of home purchase loans in moderate- income tracts which are low compared to a 13% owner-occupancy level in moderate- income tracts. The lack of performance is somewhat mitigated by the fact that these tracts contain only 2% of the assessment area's owner-occupied housing units and a significant percentage (42%) of the population live below the poverty level. These facts support the bank's contention of limited lending opportunities for home purchase. However, it is important to note that identified credit needs include affordable rehabilitation and home-improvement programs. See Table 2 on page 16 for details.

UNB's refinance activity is limited in low- and moderate- income areas. UNB originated 1% of its total refinance loans to low- income geographies. This level of performance is slightly less than the 2% of owner-occupied units in the assessment area. The percentage of refinance loans to moderate- income tracts (2%) is much lower than the 13% owner-occupied units in moderate- income tracts in the bank's assessment area. See Table 3 on page 17 for details.

### Small Business

The geographic distribution of small business loans in low- and moderate- income tracts is good. The percentage of UNB's small business loans made in low- and moderate- tracts exceeds the percentage of businesses that exist in the low- and moderate- income tracts in the assessment area.



UNB had a good distribution of small business loans throughout tracts of all income levels. UNB's percent of small business loans in low- income tracts (10%) is good compared to the 8% of businesses that exist within the tracts. Good performance was noted in moderate- income tracts where UNB made 15% of its business loans compared to 12% of businesses that exist in the areas. See Table 4 on page 18 for details.

UNB ranked fourth place among small business lenders with a market share of 10%. The three top lenders, each with a 13% market share, were Citizens National Bank, Bank One, N.A., and Mountainwest Financial Corp. Lenders with a higher market share include larger regional banks. UNB's market share performance was best in the low- and moderate- income census tracts, 17% and 14%, respectively.

### Small Farm

UNB had limited small farm activity. This is reasonable given that the Canton-Massillon area is primarily urban. During the review period, UNB originated one farm loan, the loan was made in a moderate- income tract. The percentage of small farms in low- and moderate tracts comprise 5.29% of the total farms in the assessment area. See Table 5 on page 19 for details.

UNB ranked overall sixth place in the small farm market with a market share of 3%. Of the seven lenders in the market, the top lenders were Citizens National with a 12% and The Citizens Banking Company with a 6% market share.

## **Borrower Characteristics**

UNB has reasonably served the credit needs of borrowers at all income levels, including low- and moderate- income individuals, and businesses of all sizes. This conclusion is based on: 1) a majority of small business loans were made to businesses with annual revenues of \$1 million or less; 2) small business loans in amounts less than \$100,000 represent a high percentage of the number of small business loans extended; and 3) lending to low- and moderate- income individuals within the assessment area is reasonable given the fact that a significant percentage of households live below the poverty level which indicates that income is insufficient to purchase a home.

### Home Mortgage Loans

UNB's origination of home loans and refinances to low- and moderate- income borrowers is not comparable to the amount of low- and moderate- income families in the assessment area.

UNB's level of home purchase lending to low- and moderate- income borrowers is lower than the percentage of low- and moderate- income families living in its assessment area. UNB originated 12% of its loans to low- income families, 18% of all families in the assessment area are low- income. The bank's percentage of originations to moderate- income families was higher at 15%, however, it was still less than the level of moderate- income families (18%) in the assessment area. See Table 6 on page 20 for details.

UNB's percentage of refinance lending to low- and moderate- income families is less than the percentage of total low- and moderate- income families in the assessment area. UNB originated 7% of its refinance loans to low- income families which is very low when compared to the 18% of low-

income families in the assessment area. UNB originated 13% of its refinance loans to moderate-income families which is lower than the level (18%) of moderate-income families in the assessment area. See Table 7 on page 21 for details.

### Small Business and Small Farm Lending

The distribution of UNB's loans to small businesses and small farms revealed an adequate level of lending to businesses having revenues less than \$1 million dollars.

### Small Business

Small business loans are loans made to commercial entities in amounts of \$1 million or less.

UNB's distribution of small business loans to borrowers of varying sizes is reasonable. UNB originated 54% of its small business loans to small businesses (annual revenues of \$1 million or less). This is significantly less than the level of small businesses that exist in the area (74%). However, the bank originated a majority, 79%, of its small business loans in amounts of \$100 thousand or less. Also, 1997 market data shows that the bank performs good in small business lending. The bank is the fourth largest small business lender (out of 47 lenders) with a 10% market share. Also, the bank is the fifth largest lender to small businesses with a 10% market share. See Table 8 on page 22 for details.

### Small Farm

Small farm loans are loans to agricultural entities in amounts of \$500 thousand or less.

The bank's distribution of small farm loans was limited given that the assessment area is primarily urban. UNB originated one loan in an amount between \$100 to \$250 thousand. Farms with revenues of \$1 million or less represent 93% of the total farms in the assessment area. See Table 9 on page 23 for details.

### Community Development

Community development means affordable housing and community services targeted to low- and moderate-income individuals, or activities that promote economic development by financing businesses or farms with annual gross revenues of \$1 million or less, or activities that revitalize or stabilize low- or moderate-income geographies.

UNB's origination of community development loans shows good responsiveness to the credit needs of the community given its size and capacity, and the intense competition for these types of loans within this area.

UNB originated ten loans totaling \$7.3 million. Community development loans were primarily made to support economic revitalization in downtown Canton which was noted as an important credit need. Community development loans are listed in Table 1 on page 15.

Examples of UNB's community development lending include:

- C UNB provided \$5 million to purchase and renovate 220 Market Avenue South, a downtown Canton commercial building. The renovation is part of a downtown Canton revitalization project aimed at stimulating business in that area.
- C UNB provided \$350 thousand to purchase two buildings. The buildings will house a preschool and homeless shelter for low- and moderate- income families.

Product Flexibility

UNB makes limited use of flexible lending products. The bank’s Map Loan Program is available in all markets. The program is an affordable housing loan initiative that has a maximum income limitation is \$39,250 for a family of eight or more. The maximum loan amount is \$60 thousand. A minimum down payment of 5% is required. Credit report and processing fees are waived. Underwriting ratios include housing expense 29% and total debt 41%. During the review period, UNB made 92 MAP loans totaling \$4,072,680.

**INVESTMENT TEST**

A qualified investment is a lawful investment, deposit, membership share or grant that has as its primary purpose community development.

UNB’s performance under the Investment Test was evaluated in terms of the volume of qualified investments and grants, the level of innovation and complexity associated with the investments, the degree to which the investments and grants responded to the credit and community development needs of the bank’s assessment area, and the degree to which these investments and activities are not routinely provided by private investors.

The number and dollar amount of these investments are adequate. During the review period UNB made 23 investments. These investments total \$100 thousand. Several larger institutions with greater resources and financial capabilities fund most complex investments in the assessment area. We noted, through discussion with community contacts, that some investment opportunities do exist for community banks. UNB has not taken a leadership role in investment activities.

UNB’s investments are not complex or innovative. The bank’s investments consist primarily of donations to organizations serving low- and moderate- income residents in its assessment area. These organizations promote community development, housing development, health care, education, and provide food and shelter. See Table 11 on page 25 for details. Of particular note are the following investments:

- ! The bank donated \$25,000 to the Downtown Canton Land Bank Trust. This nonprofit was formed to develop business in the downtown Canton area. This will aid in the City’s revitalization project to bring businesses into the downtown area.
- ! The bank donated \$35,000 to the United Way of Stark County. These funds will be distributed to organizations in the area that serve housing and community service needs of the community.
- ! The bank donated many furniture and fixtures to housing and service agencies.

**SERVICE TEST**

UNB's level of services is considered good. The bank's offices are essentially accessible to all geographies and individuals of different income levels in its assessment area. The bank has good banking hours that provide customers with flexible and convenient hours. A full array of UNB's financial services are available at all offices.

### Retail Banking Services

This assessment area contains 18 full service offices with 27 ATMs. The bank operates 29 ATMs throughout all assessment areas, including Summit and Wayne Counties. All office locations have at least one ATM onsite. Most ATMs are attached to branches. There are six stand alone locations at a college, hospital, and mall. UNB's offices are primarily in middle- and upper- income tracts. The bank has an office in one of its five low- income tracts, the main office which is located in downtown Canton. Three other low- income areas are in close proximity to the downtown area. The traveling distance to any area in the City of Canton is 15 minutes.

The low-income branch represents 6% of the total offices in the assessment area. This is considered reasonable when compared to the 3% of the population that live in low- income geographies. The level of offices in the moderate- income geographies (11%) is lower than the level of moderate- income people (15%) living in the assessment area. The distribution of UNB's ATMs throughout the assessment area is reasonable, representation in low- and moderate- income geographies at 19% is reasonable and it is in line with the bank's office distribution. See Table 10 on page 24 for details.

UNB has tailored its banking hours. Overall, the bank has good banking hours which include extended hours on Fridays and Saturday hours. UNB's downtown Canton and the downtown Massillon (middle-income) offices do not have Saturday hours. This is typical for most banks in downtown areas. UNB has further provided accommodations to customers by opening offices in retail establishments which offer Sunday banking. These locations provide frequent access by borrowers of all income groups, including low- and moderate- income.

The bank's record of opening offices has positively affected the accessibility to bank services within the middle- and upper- income census tracts. The bank opened three offices in this assessment area, including two in existing retail department stores, Wal-Mart and Giant Eagle.

### Alternate Delivery Systems

UNB's alternate delivery systems make services more accessible. However, due to the lack of data on how these systems affect the low- and moderate income individuals and geographies, we could not place significant weight on this area in drawing conclusions on the bank's CRA performance.

UNB offers various "U-Account" products including, a 24-hour number and computer banking. These services enable customers to access their personal and business deposit accounts, make account transfers, and perform bill payment and on-line cash management services.

### Community Development Services

UNB's level of community development services is good. These services include financial technical expertise provided to community organizations and schools, and presentations of economic classes. The bank has also participated in first time home buyer seminars.

A list of some of the community development related organizations in the Canton region in which bank management is actively involved are detailed below:

- ! Management periodically participates in presentations, or provides technical expertise regarding its financial services, including loans, to local realtors and to community groups. These include Stark County Fair Housing Department and City of Massillon Fair Housing Department.
- ! UNB offers the C.U.B. Savings Program which allows the students at Crenshaw Middle School to learn about banking policies and financial responsibility. Students are provided opportunities to bank each morning during the week at their school. The school is located in a moderate- income geography with primarily low- and moderate- income students.
- ! UNB has taken a leadership role in the YWCA Dollars and Sense Program. This program provides technical assistance to families, previously homeless, now in transitional housing. The bank supplied the program with the U-Manage software and its installation at no cost.
- ! UNB participated in the Stark County Out of Poverty Partnership Individual Development (IDA) Asset Management Program. This program combines life skills training with financial incentive to low- income families. It involves a restricted savings account that can be used for a down payment on a home, to fund a small business or for post secondary education. Participants are provided a 3-to1 match for every dollar saved. Over a two- year period, participating families are required to attend classes covering their desired ambition. The restricted savings account required is held at the bank in the form of a Pinnacle CD designed for the program. The CD can be opened with as little as \$25 and additional deposits of \$5 or greater may be made during the two-year accumulation period. This account is offered at no charge. The bank offers this CD at .42 basis points over its regular CD rate.

### Fair Lending Review

The fair lending review was based on an analysis of the bank's home purchase loans. The sample was based on a prohibited basis group of five "single White female" denied applicants and a control group of twenty "single White male" approved applicants. We performed our review to ascertain whether the bank's underwriting practices are consistently applied to all applicants. The results of the review found no differences in the bank's underwriting practices that were the result of discrimination.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED SCOPE ASSESSMENT AREAS**

UNB's performance in meeting the credit needs of the MSA 80 (Akron) assessment area and the NonMetropolitan Statistical Area (Wayne County) assessment area are as follows:

UNB's lending activity is not inconsistent with the bank's lending performance overall;

UNB's investment activity is not inconsistent with the bank's investment performance overall; and

UNB's service activity is not inconsistent with the bank's service activity overall.

**Table 1. Lending Volume**

LENDING VOLUME													State: OHIO	Assessment Period: JANUARY 1, 1997 TO DECEMBER 31, 1998
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Residential (1)		Small Business (2)		Small Farm (2)		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area		
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)			
Full Scope:														
MSA 1320/CANTON-MASSILLON	98%	426	55,095	341	35,693	1	125	10	7,272	778	98,185	96%		
Limited Scope:														
MSA 80/SUMMIT COUNTY	2%	6	973	29	1,927	1	168	0	0	36	3,068	4%		
NONMSA/WAYNE COUNTY	0	0	0	0	0	0	0	0	0	0	0	0		

(1) Based on home purchases and refinances only.

(2) Based on 1997 originations only.

**Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations**

Geographic Distribution: HMDA HOME PURCHASE																	State: OHIO		Assessment Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Overall Market Rank*	Market Share*					Total Loans					
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full Scope:																				
MSA 1320/CANTON-MASSILLON	2%	0%	13%	6%	64%	50%	21%	44%	NA	NA	NA	NA	NA	NA	251	98%				
Limited Scope:																				
MSA 80/AKRON	0%	0%	0%	0%	80%	100%	20%	0%	NA	NA	NA	NA	NA	NA	5	2%				
NONMSAWAYNE COUNTY	0%	0%	0%	0%	48%	0%	52%	0%	NA	NA	NA	NA	NA	NA	0	0%				

( ) Based on 1997 Aggregate HMDA Data only.



**Table 3. Geographic Distribution of HMDA Refinance Loan Originations**

Geographic Distribution: HMDA REFINANCE																	State: OHIO		Assessment Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Overall Market Rank*	Market Share*					Total Loans					
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full Scope:																				
MSA 1320/CANTON-MASSILLON	2%	1%	13%	2%	64%	53%	21%	44%	NA	NA	NA	NA	NA	NA	175	99%				
Limited Scope:																				
MSA 80/AKRON	0%	0%	0%	0%	80%	100%	20%	0%	NA	NA	NA	NA	NA	NA	1	1%				
NONMSAWAYNE COUNTY	0%	0%	0%	0%	48%	0%	52%	100%	NA	NA	NA	NA	NA	NA	0	0%				

( ) Based on 1997 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Small Business Loan Originations**

Geographic Distribution: SMALL BUSINESS		State: OHIO				Assessment Period: JANUARY 1, 1997 TO DECEMBER 31, 1997										
MSA/Assessment Area:	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Overall Market Rank*	Market Share*					Total Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope:																
MSA 1320/CANTON-MASSILLON	8%	10%	12%	15%	55%	46%	25%	29%	4	10%	17%	14%	8%	10%	341	92%
Limited Scope:																
MSA 80/AKRON	0%	7%	0%	4%	82%	72%	18%	17%	16	.49	.45	.14	.72	.30	29	8%
NONMSA/WAYNE COUNTY	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

**Table 5. Geographic Distribution of Small Farm Loan Originations**

Geographic Distribution: SMALL FARM																	State: OHIO		Assessment Period: JANUARY 1, 1997 TO DECEMBER 31, 1997				
MSA/Assessment Area:	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Overall Market Rank*	Market Share*					Total Loans								
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full Scope:																							
MSA 1320/CANTON-MASSILLON	1%	0%	4%	100%	73%	0%	22%	0%	6	3	0%	100%	8%	0%	1	50%							
Limited Scope:																							
MSA80/AKRON	0%	0%	0%	0%	75%	100%	25%	0%	4	4	0%	0%	5%	0%	1	50%							
NONMSA/WAYNE COUNTY	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA							

( ) Based on 1997 Aggregate Small Farm Data only.

**Table 6. Borrower Distribution of HMDA Home Purchase Loan Originations**

Borrower Distribution: HMDA HOME PURCHASE																	State: OHIO		Assessment Period: JANUARY 1, 1998 TO DECEMBER 31, 1998												
MSA/Assessment Area:	Low-Income Families		Moderate-Income Families		Middle-Income Families		Upper-Income Families		Overall Market Rank*	Market Share**					Total Loans																
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total															
Full Scope:																															
MSA 1320/CANTON-MASSILLON	18%	12%	18%	15%	25%	17%	39%	54%	NA	NA	NA	NA	NA	NA	251	98%															
Limited Scope:																															
MSA 80/ AKRON	12%	0%	17%	40%	25%	0%	46%	60%	NA	NA	NA	NA	NA	NA	5	2%															
NONMSA/WYNE COUNTY	16%	0%	16%	43%	24%	0%	44%	57%	NA	NA	NA	NA	NA	0	0%																

(\*) As a percentage of loans with borrower income information available. No information was available for 2% of loans originated by BANK.

(\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 7. Borrower Distribution of HMDA Refinance Loan Originations**

Borrower Distribution: HMDA REFINANCE																	State: OHIO		Assessment Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Families		Moderate-Income Families		Middle-Income Families		Upper-Income Families		Overall Market Rank*	Market Share**					Total Loans					
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full Scope:																				
MSA 1320/CANTON-MASSILLON	18%	7%	18%	13%	25%	18%	38%	57%	NA	NA	NA	NA	NA	NA	175	99%				
Limited Scope:																				
MSA 80/AKRON	12%	0%	17%	0%	25%	0%	46%	100%	NA	NA	NA	NA	NA	NA	1	1%				
NONMSA/WAYNE COUNTY	16%	0%	16%	0%	24%	0%	44%	100%	NA	NA	NA	NA	NA	NA	0	0%				

(\*) As a percentage of loans with borrower income information available.

(\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Small Business Loan Originations**

Borrower Distribution: SMALL BUSINESS State: OHIO Assessment Period: JANUARY 1, 1997 TO DECEMBER 31, 1997										
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Loans	
	% of Businesses*	% BANK Loans*	% Market Loans***	< \$100,000	\$100,000 to \$250,000	> \$250,000	All	Rev \$1 million or less	#	% of Total
Full Scope:										
MSA 1320/CANTON-MASSILLON	74%	54%	54%	268	35	38	10%	10%	341	92%
Limited Scope:										
MSA 80/AKRON	76%	24%	48%	24	2	3	.50	.25	29	8
NONMSA/WAYNE COUNTY	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

(\*\*) As a percentage of loans with revenue information available.

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

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

**Table 9. Borrower Distribution of Small Farm Loan Originations**

Borrower Distribution: SMALL FARM State: OHIO Assessment Period: JANUARY 1, 1997 TO DECEMBER 31, 1997										
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Loans	
	% of Businesses*	% BANK Loans**	% Market Loans***	< \$100,000	\$100,000 to \$250,000	> \$250,000	All	Rev \$1 million or less	#	% of Total
Full Scope:										
MSA 1320/CANTON-MASSILLON	93%	0%	90%	0	1	0	3%	0%	1	50%
Limited Scope:										
MSA 80/AKRON	97%	100%	96%	0	1	0	4%	5%	1	50%
NONMSA/WAYNE COUNTY	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

(\*\*) As a percentage of loans with revenue information available.

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

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

**Table 10. Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				State: OHIO				Assessment Period: JANUARY 1, 1997 TO DECEMBER 31, 1998									
MSA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope:																	
MSA 1320 CANTON-MASSILLON	98%	18	85%	1	2	9	6	27	93%	2	3	10	12	3%	15%	61%	21%
Percent of branches and ATMs				6%	11%	50%	33%			8%	11%	37%	44%				
Limited Scope:																	
MSA 80/AKRON	2%	2	9%	0	0	2	0	1	3%	0	0	1	0	0	0	81%	19%
Percent of branches and ATMs				0%	0%	100%	0%			0%	0%	100%	0%				
NONMSAWAYNE COUNTY	0%	1	6%	0	0	1	0	1	4%	0	0	1	0	0	0	58%	42%
Percent of branches and ATMs				0%	0%	100%	0%			0%	0%	100%	0%				



**Table 11. Qualified Investments**

QUALIFIED INVESTMENTS State: OHIO Assessment Period: JANUARY 1, 1997 TO DECEMBER 31, 1998											
MSA/Assessment Areas:	Affordable Housing		Community Service		Economic Development/ Small Business		Revitalize or Stabilize		Total Investments		
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s
Full Scope:											
MSA 1320/CANTON- MASSILLON	1	5	18	29	1	32	3	34	23	100	100%
Limited Scope:											
MSA 80/AKRON									0	0	0%
NONMSAWAYNE COUNTY									0	0	0%