



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## Public Disclosure

**February 24, 2003**

Community Reinvestment Act

## Performance Evaluation

**The Wayne County National Bank Of Wooster**  
**Charter Number: 828**

**112 West Liberty Street**  
**Wooster, OH 44691**

**Office of the Comptroller of the Currency**

**Cleveland Field Office**  
**3 Summit Park Drive Summit Office Park, Suite 530**  
**Independence, OH 44131**

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

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

The following table indicates the performance level of **The Wayne County National Bank Of Wooster** with respect to the Lending, Investment, and Service Tests:

<b>Performance Levels</b>	The Wayne County National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The bank's lending levels reflect an excellent responsiveness to the AA credit needs.
- The bank's geographic distribution of loans is excellent.
- The bank's distribution of loans by income level of borrower is excellent.
- Given the opportunities within the bank's AA, the level of qualified investments is adequate.
- The bank's delivery systems are accessible to all geographies and individuals of different income levels throughout the AA.

## Definitions and Common Abbreviations

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

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental 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.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**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 area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited 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, and branch distribution).

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. 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 Area (MA):** Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

**Upper-Income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

Wayne County National Bank (WCNB) is a wholly owned subsidiary of Wayne Bancorp, Inc., a publicly traded company (Nasdaq: WNNB) headquartered in Wooster, Ohio. As of September 30, 2002, WNNB had \$506 million in total assets.

WCNB is an intrastate bank, with thirteen bank offices in the state of Ohio. WCNB has two assessment areas for CRA purposes. The bank operates in the Canton-Massillon MA and in the Non-MA geographies of Holmes and Wayne counties. The bank has made no changes to its AA since the previous examination.

WCNB offers a full range of banking products and services. As of December 31, 2002, WCNB had \$446 million in assets. Loans represented 66 percent of total assets. The distribution of WCNB's loan portfolio is as follows: real estate loans (28 percent); commercial & industrial loans (60 percent); loans to individuals (9 percent); agricultural loans (2 percent); the remaining (1 percent) is comprised of multiple other loans categories. The bank's real estate loan mix primarily consists of 1-4 family residential (96 percent) loans. WCNB's Tier One capital is \$42 million.

In determining the size and capacity of WCNB for CRA evaluation purposes, we considered operating affiliates of the bank. At the time of the evaluation, the holding company also owned Chippewa Valley Bank located in Rittman, Ohio. This affiliate is a state regulated institution and neither contributes to or detracts from the CRA performance of the bank.

WCNB was rated "Satisfactory" at its last Large Bank CRA Performance Evaluation dated April 17, 2000.

There are no legal, financial or other factors that impede the bank's ability to help meet the credit needs in its assessment areas (AAs).

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment and Service Tests. In evaluating the bank's lending performance, we reviewed its home mortgage loans subject to filing under HMDA and small loans to businesses and small loans to farms subject to filing under CRA. With the exception of CD loans, the evaluation period for the Lending Test is January 1, 2000 through December 31, 2002. The evaluation period for CD loans, qualified investments and CD services is April 17, 2000 through February 24, 2003.

### Data Integrity

The Community Reinvestment Act requires that banks collect and maintain certain data regarding originations and purchases of home mortgage loans, small loans to businesses and small loans to farms. This information is maintained in the bank's Public File. As part of the CRA evaluation, we tested the bank's publicly filed home mortgage and small loans to businesses data for accuracy. We also evaluated WCNB's processes to ensure that data are reliable.

We determined the bank's home mortgage data to be accurate. However, an initial review of the data on small loans to businesses revealed significant errors relating to gross annual revenue codes for borrowers. Bank management addressed these issues and file amended reports as appropriate. We conducted a subsequent review to evaluate the bank's actions to correct the data and found the data to be reliable. Therefore, this evaluation is based on accurate data.

CD loans, qualified investments and CD services submitted by WCNB management were verified to ensure that they met the regulatory definition for community development. Some items submitted for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development. Therefore, this evaluation was based on CD loans, qualified investments, and CD services that met the regulatory definitions.

### Selection of Areas for Full-Scope Review

We selected the Non-MA Areas of Ohio for full-scope review. This determination was based the percentage of bank deposits and deposit market share, percentage of bank loans and distribution of bank offices among the AAs. The Non-MA Areas of Ohio has 97 percent of the bank's deposits, 97 percent of the bank's total loans and 93 percent of the bank's offices.

The data contained in the tables in Appendix C was evaluated for all the bank's delineated AAs. For the area receiving a full-scope review, additional information was developed concerning credit and community development needs and opportunities for community development activities.

### Ratings

The bank's overall rating is based primarily on the AA receiving the full-scope review.

## **Other**

Information regarding the credit and deposit needs of the full-scope review area was obtained through contacts with local community development organizations, local municipalities, the Department of Housing and Urban Development, the Ohio Department of Jobs and Family Services and information provided by the OCC Central District Community Affairs Officer. Details for the bank's AA are contained within the Market Profiles for Full-Scope Area in appendix B.

## Fair Lending Review

An analysis of the most recent public comments and consumer complaint information and HMDA, small business and small farm lending was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year.

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

The bank's performance under the lending test is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Non-MA Areas of Ohio is excellent.

We placed more emphasis on home mortgage loans and small loans to businesses when evaluating product performance based on identified credit needs and the fact that WCNB originated significantly more of these loan products than small loans to farms. Within the home mortgage product category, we placed more weight on home refinance loans (836) based on loan volume. Home purchase loans (475) received moderate weight and home improvement loans (178) received the least weight. Because the number of the bank's multifamily loans is not significant enough to perform a meaningful analysis, we did not consider multifamily loans in evaluating the bank's geographic distribution of loans.

#### Lending Activity

Refer to Tables 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect excellent responsiveness to meeting the credit needs of the AA. Relative to its deposit market rank, WCNB's home mortgage lending levels are excellent. WCNB's small loans to business lending levels are excellent and its small loans to farms lending levels are excellent.

Within the Non-MA Areas of Ohio, WCNB ranks first in deposits (18 percent market share), first in home mortgages (11 percent market share), first in small loans to businesses (17 percent market share) and first in small loans to farms (54 percent market share).

#### Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the AA is excellent. The geographic distribution of home mortgage loans is excellent. The geographic distribution of small loans to businesses is excellent and the geographic distribution of small loans to farms is excellent.

We considered the following factors in assessing the bank's geographic lending performance. There are no low-income geographies with the AA, and one moderate-income geography. For home mortgage loans, our review focused on the bank's lending performance relative to the level of owner-occupied units in the moderate-income geography (three percent). For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses located within the moderate-income geography (three percent). For

small loans to farms, our review focused on the bank's lending performance relative to the percentage of farms located within the moderate-income geography (four percent).

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4 and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of the bank's home purchase loans, home improvement loans, and home refinance loans is excellent. For each of the three product lines, the percentage of WCNB's loans in the moderate-income geography exceeds the percentage of owner-occupied housing units located there. Furthermore, the bank's market share in the moderate-income geography for each loan type significantly exceeds its overall market share for those products.

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

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of the bank's small loans to businesses is excellent. WCNB's percentage of small loans to businesses in the moderate-income geography exceeds the percentage of business located within the same. The bank's market share for small loans to businesses in the moderate-income geography exceeds its overall market share.

### ***Small Loans to Farms***

Refer to Table 7 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of the bank's small loans to farms is excellent. WCNB's percentage of small loans to farms in the moderate-income geography exceeds the percentage of farms located within the same. The bank's market share for small loans to farms in the moderate-income geography exceeds its overall market share.

### ***Lending Gap Analysis***

WCNB's lending within its AA was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank's home mortgage, small loans to businesses and small loans to farms. No unexplained or conspicuous gaps were identified.

### ***Inside/Outside Ratio***

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank's AAs.

A substantial majority of the bank's loan originations are within its AAs. Overall, 93 percent of WCNB's loan originations are within its AA. By loan product, 94 percent of the bank's home mortgage loans, 93 percent of small loans to businesses, and 95 percent of the small loans to

farms are inside its AA. Within the home mortgage loans, WCNB's originations of home purchase, home improvement and home refinance inside the bank's AA are 93 percent, 95 percent and 94 percent respectively. This performance had a positive impact on the analysis of the bank's geographic distribution of lending.

## **Distribution of Loans by Income Level of the Borrower**

The overall distribution of loans by income level of borrower in the AA is excellent. The distribution of home mortgage loans by borrower income level is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is excellent. The distribution of small loans to farms with annual revenues of \$1 million or less is excellent.

We considered the following factors in assessing the bank's lending performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank's lending performance relative to the level of low- and moderate-income families with the AA. Sixteen percent of the AA is listed as low-income and 18 percent is listed as moderate-income. Of these households, 11 percent are listed as below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage loan opportunities for low-income families in the AA are somewhat limited. This issue was factored into the analysis for home purchase and home refinance loans.

For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses with annual revenues of \$1 million or less. Seventy-seven percent of the businesses located in the AA have reported gross annual revenues of \$1 million or less. Information obtained from community contacts also indicated that business loans in amounts of \$100,000 or less was a credit need of the AA. As such, loan size was also considered in the analysis.

For small loans to farms, our review focused on the bank's lending performance relative to the percentage of farms with annual revenues of \$1 million or less. Ninety-four percent of the farms located in the AA have reported gross annual revenues of \$1 million or less. Information obtained from community contacts also indicated that farm loans in amount of \$100,000 or less was a credit need of the AA. As such, loan size was also considered in the analysis.

## ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

## **Home Purchase Loans**

The borrower distribution of the bank's home purchase loans is excellent.

WCNB's percentage of home purchase loans made to low-income borrowers is somewhat below the percentage of low-income families in the AA. Although, the bank's percentage of

home purchase loans to low-income borrowers is lower than the portion of the AA defined as such, this performance is considered good given the performance context issues outlined above. Additionally, WCNB is the AA leader in home purchase loans to low-income borrowers. The bank's market share for home purchase loans to moderate-income borrowers significantly exceeds its overall market share.

WCNB's percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to moderate-income borrowers exceeds its overall market share.

### **Home Improvement Loans**

The borrower distribution of the bank's home improvement loans is excellent.

WCNB's percentage of home improvement loans made to low-income borrowers significantly exceeds the percentage of low-income families in the AA. The bank's market share for home improvement loans to low-income borrowers significantly exceeds its overall market share.

WCNB's percentage of home refinance loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for home improvement loans to moderate-income borrowers exceeds its overall market share.

### **Home Refinance Loans**

The borrower distribution of the bank's home refinance loans is good.

WCNB's percentage of home refinance loans made to low-income borrowers is below the percentage of low-income families in the AA. Although, the bank's percentage of home refinance loans to low-income borrowers is lower than the portion of the AA defined as such, this performance is considered adequate given the performance context issues outlined above. Additionally, WCNB is the second leading lender in home refinance loans to low-income borrowers. The bank's market share for home refinance loans to low-income borrowers is somewhat below its overall market share.

WCNB's percentage of home refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home refinance loans to moderate-income borrowers exceeds its overall market share.

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

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of the bank's small loans to businesses is excellent. WCNB's percentage of small loans to businesses with revenues of \$1 million or less is near to the

percentage of businesses defined as such. The bank's market share of small loans to businesses with revenues of \$1 million or less significantly exceeds its overall market share. WCNB is also the leader in small loans to businesses with revenues of \$1 million or less. Additionally, a substantial majority of WCNB's small loans to businesses are for amounts of \$100,000 or less, which addresses an identified credit need of the AA.

### ***Small Loans to Farms***

Refer to Table 12 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of the bank's small loans to farms is excellent. WCNB's percentage of small loans to farms with revenues of \$1 million or less exceeds the percentage of farms defined as such. The bank's market share of small loans to farms with revenues of \$1 million or less exceeds its overall market share. WCNB is also the leader in small loans to farms with revenues of \$1 million or less. Additionally, a substantial majority of WCNB's small loans to farms are for amounts of \$100,000 or less, which addresses an identified credit need of the AA.

### **Community Development Lending**

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

WCNB's level of CD lending is adequate, based on the available opportunities within the bank's AA. Based on a pro-rata share of the bank's deposits for the AA, the level of CD lending represents less than 1 percent of Tier One capital. These loans had a neutral impact on the bank's lending performance in the AA.

Within Wooster, WCNB made 3 loans totaling \$300,000 to a non-profit organization that provides clothing and other goods to low- and moderate-income individuals as well as training and employment resources to disabled and economically disadvantaged individuals.

### **Product Innovation and Flexibility**

WCNB offers several flexible loan products designed to assist low- and moderate-income borrowers, small businesses and small farms to obtain financing. Loans originated under these programs are evaluated as home mortgage and small business or small farm loans under the Lending Test.

Working with a non-profit organization, WCNB also provides funding for Goodwill's "Wheels to Work" Program. The program offers low interest car loans for individuals who are at or below the poverty level.

While these programs provide flexible terms and conditions, none are considered innovative. The bank's flexible loan products had a neutral impact on the lending performance in the AA.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Canton-Massillon MA is not inconsistent with the bank's overall "Outstanding" performance under the lending test. Refer to Tables 1 through 13 in appendix C for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Non MA of Ohio is adequate.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, WCNB made \$68 thousand in qualified investments in the Non-MA Areas of Ohio. There are no investments outstanding from prior periods. Based on the bank's size and capacity, and the investment opportunities in the AA, this level of activity is adequate. Information gathered from bank management, performance evaluations of similarly situated local financial institutions, contact with community organizations and the CED Community Affairs Officer indicate that investment opportunities in the AA are limited. Opportunities consist primarily through donations to organizations providing community development services. Refer to the Market Profile in appendix B for more information on identified CD opportunities.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the investment test in the Canton-Massillon MA is not inconsistent with the bank's overall "Low Satisfactory" performance under the investment test.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Non-MA Areas of Ohio is good.

## Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

In the Non-MA Areas of Ohio, WCNB's delivery systems are accessible to all income-level geographies and individuals. The bank operates 12 full service branch facilities in the AA. The percentage of the bank's branches in moderate-income geographies exceeds the percentage of the population residing in those geographies. The AA has no low-income geographies. In addition, the bank has automated teller machines (ATMs) at eleven of these locations. Of these, one (10 percent) is located in moderate-income geographies, seven (63 percent) are located in middle-income geographies and three (27 percent) are located in upper-income geographies. Services do not vary in a way that inconveniences any portion of the AA. During the evaluation period, WCNB closed one branch in a middle-income geography. This had a neutral impact on the AA.

WCNB also offers alternative systems for delivering retail banking services to its customers including bank-by-mail, bank-by-phone and on-line banking. We could not, however, place significant weight on these programs when drawing our CRA performance conclusions because no data was available for analysis.

## Community Development Services

WCNB provides an adequate level of CD services to the Non-MA areas of Ohio. During the evaluation period, the bank provided 5 CD services to the AA. Primary services include providing financial expertise to a variety of community service and development organizations through board memberships.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Canton-Massillon MA is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test. Refer to Table 15 in appendix C for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan 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").

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 01/01/2000 to 12/31/2002 Investment and Service Tests and CD Loans: 04/17/2000 to 02/24/2003	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Wayne County National Bank (WCNB) Wooster, Ohio		Home Mortgage Loans Small Loans to Businesses Small Loans to Farms Community Development Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Non-MA of Ohio	Full-Scope	Counties of Holmes and Wayne
Canton-Massillon MA	Limited-Scope	AA includes 4 geographies in Stark County

## Appendix B: Market Profiles for Full-Scope Areas

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#### Market Profiles for Areas Receiving Full-Scope Reviews

Non MA of Ohio .....	2
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## Non-MA Areas of Ohio

Demographic Information for Full-Scope Area: Non-MA Areas of Ohio						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	38	0.00	2.63	76.32	21.05	0.00
Population by Geography	134,310	0.00	4.20	80.03	15.77	0.00
Owner-Occupied Housing by Geography	32,541	0.00	3.21	79.04	17.71	0.00
Businesses by Geography	7,302	0.00	2.99	80.09	16.93	0.00
Farms by Geography	916	0.00	3.82	81.22	14.96	0.00
Family Distribution by Income Level	34,997	16.03	18.15	25.46	40.35	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,964	0.00	4.89	83.49	11.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$30,562 = \$48,700 = 11.26%		Median Housing Value Unemployment Rate		= \$65,032 = 3.65 %	

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

Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The AA consists of Holmes and Wayne Counties of Ohio. Within the AA, there are no low-income geographies, 1 moderate-income geography, 33 middle-income geographies and 8 upper-income geographies.

WCNB operates 12 full-service branches and 11 ATMs in the AA, which conduct traditional banking services. The bank's primary business focus in the AA is traditional retail banking.

WCNB's deposits in the Non-MA Areas of Ohio total approximately \$354 million. Based on FDIC deposit market share data as of June 30, 2002, this represents 97 percent of the bank's total deposits. WCNB is the largest deposit taking institution in the AA with an 18 percent market share. Competitors in the AA include, but are not limited to FirstMerit N.A., Wayne Savings Community Bank, Killbuck Savings Company and Ohio Legacy Bank NA.

Total bank loans in the AA equal \$273 million and represent 97 percent of the total loans reported.

The unemployment rate as of December 31, 2002 for Holmes and Wayne Counties is 2.9 percent and 4.4 percent respectively. Both are slightly below the Ohio state average of 5.0 percent. Historically, the Wayne County economy is manufacturing oriented. Wholesale and retail trade is also a primary industry, closely followed by services and government. Wayne County is one of the most productive agricultural counties in the state of Ohio and is the site of the OSU Agricultural Research & Development Center and OSU Agricultural Institute. The City of Wooster is the retail and economic center of the county.

Wayne County has been appointed as an Enterprise Zone by the State of Ohio for economic development. As such, the county has approved 50% EZ agreements on real and personal property taxes on new building and/or machinery and equipment. Wayne County growth is guided by a comprehensive strategic economic development plan that prioritizes expansion and recruitment based on the existing industry and support industries for the same. Primary growth is intended for the communities of Wooster, Orrville and Rittman. The current infrastructure within the county will support a growth rate of 2% annually for the next 20 years.

Holmes County is primarily rural with a large Amish population. The town of Millersburg is its retail center.

The 2002 HUD adjusted median family income for the AA is \$48,700. Based on the 1990 census data, 16 percent of the families are low-income and 18 percent of the families are moderate-income. Additionally, 11 percent of the AA is listed as below the poverty level. The 1990 median housing value is \$65,032.

We determined the community's credit needs by contacting representatives from local housing and community service agencies and small business development organizations. Information regarding community credit needs was also obtained from bank management and the CED Community Affairs Officer.

We identified the following credit and non-credit related needs in this AA:

- Affordable housing (i.e. single family rental, multifamily rental, homeownership and rehabilitation) for low- and moderate-income individuals.
- Small business working capital loans to existing and start-up businesses in amounts of \$100 and less. Technical assistance to new and existing small businesses was also identified as a need.
- Social services to low- and moderate-income families, including child care services, counseling and job training, credit and home ownership, food donation, and health care services.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services with the AA is limited. Within the AA, there is only one economic development organization that provides investment opportunities. There are no small business mini-loan fund programs or other private or public entities for this purpose. Additionally, beyond the annual shareholder contributions, the majority of the opportunities for financial institutions are in the role of commercial lender. Competition for CD loans, qualified investments and CD services is moderate and consists primarily of several financial institutions that have a presence with the AA.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

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 and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

**Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

**Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.

**Table 10. Borrower Distribution of Refinance Loans** - See Table 8.

**Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - 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 households 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 MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

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

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Table 1. Lending Volume**

LENDING VOLUME			Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002					
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Non MA of Ohio	96.92	1,497	126,580	1,282	129,658	337	16,295	3	300	3,119	272,833	96.82
<b>Limited Review:</b>												
Canton-Massillon MA	3.08	44	2,942	38	1,922	7	487	0	0	89	5,351	3.18

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

\*\* The evaluation period for Community Development Loans is April 17, 2000 to February 24, 2003.

\*\*\* Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: OHIO			Evaluation Period: January 1, 2000 TO December 31, 2002											
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography						
	#	% of Total**	% 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		
<b>Full Review:</b>																	
Non MA of Ohio	475	98.34	0.00	0.00	3.21	5.47	79.04	68.42	17.74	26.11	9.87	0.00	37.50	9.55	9.29		
<b>Limited Review:</b>																	
Canion-Massillon MA	8	1.66	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	2.18	0.00	0.00	2.18	0.00		

\* Based on 2001 Peer Mortgage Data: Central Region.

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>					
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Non MA of Ohio	178	96.74	0.00	0.00	3.21	5.06	79.04	79.21	17.74	15.73	27.14	0.00	66.67	26.29	24.14	
<b>Limited Review:</b>																
Canton-Massillon MA	6	3.26	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	2.90	0.00	0.00	2.90	0.00	

<sup>\*</sup> Based on 2001 Peer Mortgage Data: Central Region.<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO Evaluation Period: January 1, 2000 TO December 31, 2002												
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non MA of Ohio	836	96.54	0.00	0.00	3.21	5.38	79.04	72.37	17.74	22.25	10.56	0.00	30.99	10.31	9.34
<b>Limited Review:</b>															
Canton-Massillon MA	30	3.46	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.57	0.00	0.00	1.57	0.00

\* Based on 2001 Peer Mortgage Data: Central Region.

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: OHIO			Evaluation Period: January 1, 2000 TO December 31, 2002											
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>						
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Up p		
<b>Full Review:</b>																	
Non MA of Ohio	8	100.00	0.00	0.00	0.00	0.00	78.08	87.50	21.92	12.50	50.00	0.00	0.00	100.00	0.00		
<b>Limited Review:</b>																	
Canton-Massillon MA	0	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2001 Peer Mortgage Data: Central Region.<sup>\*\*</sup> Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.<sup>\*\*\*</sup> Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES				Geography: OHIO		Evaluation Period: January 1, 2000 TO December 31, 2002									
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non MA of Ohio	1,282	97.12	0.00	0.00	2.99	4.91	80.09	79.25	16.93	15.83	16.91	0.00	18.45	18.41	15.49
<b>Limited Review:</b>															
Canton-Massillon MA	38	2.88	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.29	0.00	0.00	0.45	0.10

\* Based on 2001 Peer Small Business Data: US.

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

\*\*\* Source Data - Dun and Bradstreet (2001).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS				Geography: OHIO		Evaluation Period: January 1, 2000 TO December 31, 2002									
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non MA of Ohio	337	97.97	0.00	0.00	3.82	4.45	81.22	86.35	14.96	9.20	54.21	0.00	75.00	52.82	63.64
<b>Limited Review:</b>															
Canton-Massillon MA	7	2.03	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	10.71	0.00	0.00	9.09	16.67

<sup>\*</sup> Based on 2001 Peer Small Business Data: US.<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2001).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE				Geography: OHIO		Evaluation Period: January 1, 2000 TO December 31, 2002									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans*****	% Families**	% BANK Loans*****	% Families*	% BANK Loans*****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non MA of Ohio	475	98.34	16.03	10.97	18.15	22.36	25.46	28.27	40.35	38.40	11.15	17.53	12.43	8.79	11.39
<b>Limited Review:</b>															
Canton-Massillon MA	8	1.66	15.22	25.00	20.79	25.00	29.87	25.00	34.12	25.00	2.58	8.33	3.39	0.00	1.89

\* Based on 2001 Peer Mortgage Data: Central Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 0.21% of loans originated and purchased by Bank.

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

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

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT				Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share						
	#	% of Total**	% Families* **	% BANK Loans***	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp		
<b>Full Review:</b>																	
Non MA of Ohio	178	96.74	16.03	31.82	18.15	26.14	25.46	17.61	40.35	24.43	27.05	62.16	32.35	14.04	17.72		
<b>Limited Review:</b>																	
Canton-Massillon MA	6	3.26	15.22	16.67	20.79	33.33	29.87	50.00	34.12	0.00	2.94	10.00	4.17	0.00	0.00		

\* Based on 2001 Peer Mortgage Data: Central Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 1.09% of loans originated and purchased by Bank.

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

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

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO		Evaluation Period: January 1, 2000 TO December 31, 2002										
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families* **	% BANK Loans***	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non MA of Ohio	836	96.54	16.03	4.72	18.15	21.16	25.46	28.17	40.35	45.95	11.66	9.82	13.26	11.16	11.51
<b>Limited Review:</b>															
Canton-Massillon MA	30	3.46	15.22	3.33	20.79	20.00	29.87	33.33	34.12	43.33	1.77	0.00	1.90	2.18	1.68

\* Based on 2001 Peer Mortgage Data: Central Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 1.04% of loans originated and purchased by Bank.

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

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

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: OHIO		Evaluation Period: January 1, 2000 TO December 31, 2002			
MA/Assessment Area:	Total Small Loans to Businesses	Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share		
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	
<b>Full Review:</b>									
Non MA of Ohio	1,282	97.12	77.35	73.95	76.60	11.93	11.47	16.91	27.83
<b>Limited Review:</b>									
Canton-Massillon MA	38	2.88	76.44	92.11	89.47	7.89	2.63	0.29	0.78

\* Based on 2001 Peer Small Business Data: US.

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0% of small loans to businesses originated and purchased by the Bank.

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS			Geography: OHIO		Evaluation Period: January 1, 2000 TO December 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms	Farms With Revenues of \$1 million or less	Loans by Original Amount Regardless of Farm Size					Market Share	
	#	% of Total**	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Non MA of Ohio	337	97.97	94.32	97.92	86.94	10.98	2.08	54.21	56.65
<b>Limited Review:</b>									
Canton-Massillon MA	7	2.03	99.09	100.00	85.71	14.29	0.00	10.71	17.65

\* Based on 2001 Peer Small Business Data: US.

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0% of small loans to farms originated and purchased by Bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: OHIO		Evaluation Period: April 17, 2000 TO February 24, 2003					
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Non MA of Ohio	0	0	37	68	37	68	100.00	0	0
<b>Limited Review:</b>									
Canion-Massillon MA	0	0	0	0	0	0	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Geography: OHIO					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography					
	Low			Mod	Mid	Upp	Low			Mod	Mid	Upp	Low	Mod	Mid	Upp			
<b>Full Review:</b>																			
Non MA of Ohio	96.82	12	92.00	0.00	8.34	58.33	33.33	0	1	0	0	-1	0	0.00	4.20	80.03	15.77		
<b>Limited Review:</b>																			
Canton-Massillon MA	3.18	1	8.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00		

