



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

United National Bank and Trust Company
Charter Number: 14501

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Canton, OH 44701

Office of the Comptroller of the Currency

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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 United National Bank and Trust Company with respect to the Lending, Investment, and Service Tests:

Performance Levels	United National Bank and Trust Company Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	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:

- Substantial percent of HMDA loans and adequate percent of small loans to businesses originated within the assessment areas;
- Borrower distribution is good for home mortgage loans and adequate for small loans to businesses;
- Geographic distribution is adequate for both small loans to businesses and home mortgage loans;
- Positive impact of community development lending;
- Good level of qualified investments;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA; and Good level of community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate - Any company that controls, is controlled by, or is under common control 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.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

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

Community Development (CD) - Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA) - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

Geography - A census tract or a block numbering area delineated by the U.S. Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA) - The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

Limited-Scope Review - Performance under the lending, investment, and service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution).

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

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 Statistical Area (MSA) - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

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

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

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

Small Loans to Farms - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

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

Description of Institution

The United Bank and Trust Company (UNB) is headquartered in Canton, Ohio and had total assets of \$1.1 billion as of June 30, 2001. Of this amount, tier one capital totaled \$74.1 million.

UNB is an intrastate bank. Its primary market areas are the cities and surrounding areas of Canton and Massillon, both in northeast Ohio. UNB has three assessment areas (AAs); one metropolitan statistical area (MSA) Canton-Massillon and portions of Summit and Wayne counties in Ohio. UNB has 21 full service offices and 27 automated teller machines (ATMs). Since the last CRA evaluation the bank has opened two new branches and closed two. All activity occurred in middle or upper-income census tracts. The bank has not entered any new markets during this evaluation period.

UNB is a wholly owned subsidiary of UNB Corporation, a \$1.1 billion holding company located in Canton, Ohio. In addition to parenting UNB, the Corporation consists of United Banc Financial Services Inc. (a sub-prime lending affiliate) and United Insurance Agency, Inc (an insurance company). No new affiliates were added to the holding company since the last evaluation. These affiliates do not materially affect the bank's ability to address community credit needs. The bank did not elect to have any affiliate activities in this evaluation.

UNB offers a full range of retail and commercial bank products in addition to trust services. This product mix includes an array of residential mortgage, commercial and consumer loans. The bank's primary lending focus remains in retail lending. Gross loans are 82% of total assets. As of June 30, 2001, UNB's gross loans of \$876 million comprise the following portions of its loan portfolio: residential mortgages (39%), commercial loans (27%), consumer loans (21%), commercial real estate (11%), and construction loans (2%). In addition, the bank packages and sells a significant amount of fixed-rate home loans in the secondary market.

The bank's CRA performance was rated Satisfactory in the previous public evaluation dated January 25, 1999. At that time the bank was an \$862 million institution and has grown 24%.

There are no current legal, financial, or other impediments that would hamper UNB's ability to help meet the credit needs of its communities.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period was January 25, 1999 (the date of the last evaluation) through October 29, 2001. For the Lending Test, Home Mortgage Disclosure Act (HMDA) data and CRA data for the two full calendar years of 1999 and 2000 was used. Community Development Loans, the Investment Test and the Service Test were evaluated for the period January 25, 1999 through October 29, 2001.

Detail of the bank's HMDA loans and small loans to businesses are provided in the tables in Appendix C of this evaluation. Although small loans to farms are included in Table 1 in the Appendix, an analysis of this area was not performed due to its limited activity. The bank originated two small loans to farms in its AAs during the evaluation period. The bank originated two multifamily loans that are not included in this evaluation. The volume of the multi-family loans was not considered significant and they were originated in a middle- and upper-income geography; income information on the borrowers was not available.

For our lending analyses, we used 1999 Peer HMDA data and 1999 Small Business Reporter data for small loans to businesses. We also used June 2000 deposit market data from the Federal Deposit Insurance Corporation (FDIC) which is the latest information available.

Data Integrity

In the first quarter 2001 we performed a data integrity review of the bank's HMDA loans and small loans to businesses and farms. The review included loans originated in years 1999 and 2000. We determined that bank's reporting of HMDA and small loans to businesses and farms data is reliable.

We reviewed the bank's lists of qualified investments, community development (CD) loans, and CD services. We determined that some items did not meet the definition of a qualified investment, CD loan or CD service. We used corrected lists for our evaluation analyses.

Selection of Areas for Full-Scope Review

From the bank's three AAs, we selected the Canton-Massillon MSA (MSA 1320) to receive a full-scope review. Refer to Appendix A for additional information regarding full-scope reviews.

The Canton-Massillon MSA contains a substantial majority of the AAs geographies (85%), bank's deposits (98%), HMDA loans (95%) and small loans to businesses (99%).

A limited-scope review was performed for the bank's other two AAs, portions of Summit County and portions of Wayne County. These AAs combined represent less than 3% of the bank's total deposits and reported loans.

Ratings

The bank's overall rating is based primarily on performance from the Canton-Massillon AA that received a full-scope review. When determining conclusions for the Lending Test, small loans to businesses were weighed more heavily than HMDA loans due to their volume. Within home mortgage loans, home purchase loans were weighed heaviest because of its significant volume in comparison to the other home mortgage products and secondarily, home-improvement loans because they were identified as a community credit need.

Other

We performed two community contacts during the evaluation. Identified community needs are affordable housing, housing stock rehabilitation, increased availability of full-service financial institution branches in low- and moderate-income neighborhoods, and new construction to revitalize existing neighborhoods. Community credit needs identified are affordable home-improvement loans, renovation loans for rental properties, specialized lending programs to address the small business needs of women and minorities, and a revolving loan fund to encourage small business development.

Fair Lending Review

An analysis of the most recent public comments, consumer complaint information, HMDA, and small business and farm lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending examination was performed in 1998.

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 Low Satisfactory. Based on the full-scope review, the bank's performance in the Canton-Massillon MSA AA is adequate.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

The bank has an adequate volume of lending.

The bank's loan originations/purchases during the review period included home mortgage loans (40%), small loans to businesses (60%), and small loans to farms (less than 1%).

In the Canton-Massillon AA UNB is the financial institution with the second highest deposit market share, 17.66%. The lead is a large regional multi-billion dollar financial institution headquartered in Akron, Ohio.

Relative to its asset size, UNB is a leader in small business lending among the top seven small business lenders in the AA. UNB is the smallest institution in terms of asset size; other financial institutions' assets are at least ten times that of UNB. According to the 1999 Small Business Reporter for the Canton-Massillon AA, UNB has an 8.83% small business market share in the AA.

UNB is not a leader of HMDA loans in the AA, they are one of many financial institutions and mortgage institutions. According to 1999 Peer Data for the Canton-Massillon AA, UNB had 3.82% home purchase market share, .79% home-improvement market share, and .88% refinance market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

UNB's geographic distribution of home mortgage loans is adequate.

UNB's ability to lend is somewhat affected by a high level of renter occupied units, and limited levels of new construction and home sales. The low-income geographies, compared to the other geographies in the Canton-Massillon AA, contain the highest percent of renter occupied units (56%).

UNB's geographic distribution of home purchase loans is adequate based on the economic conditions of the AA as discussed above. UNB's percent of home purchase loans in both low- and moderate-income geographies are less (approximately half), of that of the demographics of those geographies. Also, UNB's market shares of home purchase loans in low- and moderate-income geographies are each less than its overall home purchase market share in the AA.

UNB's geographic distribution of home improvement loans is excellent. UNB's geographic distribution of home improvement loans in both the low- and moderate-income geographies significantly exceeds the demographics of those geographies. However, UNB's market shares of home improvement loans in low- and moderate-income geographies in the AA are significantly less than its overall home improvement market share. The bank reported no home improvement loans in low-income geographies during 1999. However, UNB is an active home equity lender but has elected to not collect information on those that are for home improvement purposes.

UNB's geographic distribution of refinance loans is poor. The bank is not a major lender in this market and competition (302 lenders) is keen for this type of lending. During this review period, UNB did not originate any refinance loans in low-income geographies and their geographic distribution of refinance loans originated in moderate-income geographies is considerably less than the demographics of those geographies. Additionally, UNB's market share of refinance loans in moderate-income geographies is significantly less than its overall refinance market share in the AA.

Small Loans to Businesses

Refer to Table 5 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.

UNB's geographic distribution of small loans to businesses is adequate.

The percent of small loans to businesses by UNB in low-income geographies is significantly less than the percent of businesses located in low-income geographies. However, UNB's market share in low-income geographies was better than its overall small loans to businesses market share in 1999.

The percent of small loans to businesses by UNB in moderate-income geographies exceeds the percent of businesses in those geographies. Also, UNB's market share for small loans to businesses originated in moderate-income geographies exceeds its overall market share for small loans to businesses in the AA.

Lending Gap Analysis

UNB's lending activity of home mortgage loans and small loans to businesses was reviewed to identify any gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified. The bank had identified areas with low penetration and took steps to improve performance. This, included implementing additional training at the branches and investing in a mortgage-back security that will finance an affordable housing project in the low-income geography in Alliance.

Inside/Outside Ratio

This analysis was performed at the bank level as opposed to the AA level. UNB originated a substantial majority of its loans in its AAs. Approximately 85% of home mortgage loans and 79% of small loans to businesses were made within the bank's AAs. This performance had a positive impact on the bank's geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 6, 7, and 8 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

UNB's borrower distribution of home mortgage loans is good.

UNB's borrower distribution of home purchase originations is good based on its originations to both low- and moderate-income borrowers. The bank's ability to lend to low-income borrowers is affected by a high number of households living below the poverty level and limited availability of affordable homes.

UNB's borrower distribution of home purchase loans to low-income borrowers is less than the demographics of those borrowers in the assessment area. However, UNB's market share for loans to low-income borrowers exceeds its home purchase overall market share.

UNB's borrower distribution of home purchase loans to moderate-income borrowers is less than the demographics of those borrowers in the assessment area. Also, UNB's market share of home purchase loans originated to moderate-income borrowers is less than its home purchase overall market share. However, out of 145 originators of home purchase loans to moderate-income borrowers in the AA, UNB was number 15.

UNB's borrower distribution of home improvement loans is excellent. UNB's borrower distribution of home improvement loans to low- and moderate-income borrowers exceeds the demographics of those borrowers in the assessment area. The 1999 Peer Data showed that the bank made no home improvement loans to low-income borrowers during that year. However, this type of lending is also conducted in the home equity loan portfolio and the bank does not track the data at this time. UNB's market share for home improvement loans to moderate-income borrowers exceeds its home improvement overall market share.

UNB's borrower distribution of refinance loans is good based on its lending to moderate-income borrowers. The bank is among many competitors and this is not a major lending focus of the bank. Competition for refinances to low- and moderate-income borrowers is very keen in the AA ranging from 133 to 173 financial institutions. UNB ranked as the 63rd and the 33rd highest originator of refinances to low- and moderate-income borrowers, respectively.

UNB's borrower distribution of refinance loans to low-income borrowers is less than the demographics of low-income borrowers in the AA. Also, UNB's market share for refinance loans to low-income borrowers is less than half of its refinance overall market share. However, UNB's borrower distribution of refinance loans originated to moderate-income borrowers is very near the demographics of moderate-income borrowers in the AA. UNB's market share for refinance loans to moderate-income borrowers is less, but approximates three-fourths of its refinance overall market share.

Small Loans to Businesses

Refer to Table 9 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.

UNB's overall borrower distribution of small loans to businesses is adequate.

UNB's percentage of loans to businesses with revenues of \$1 million or less was considerably less than the percentage of businesses in the AA with revenues of \$1 million or less. However, UNB performed well considering competition is tight and afforded by mega-financial entities of much larger size and resources than UNB. Out of the top ten small business lenders, UNB is number four and the only community bank.

UNB made a substantial percentage of its small loans to businesses in amounts of \$100,000 or less.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development (CD) lending.

CD lending had a positive impact on the Lending Test conclusions.

UNB's community development lending centered on lending to government assisted housing programs and service organizations that provide services to low- and moderate-income persons. The bank's loans included four loans totaling \$3,104,000 to Stark County Metropolitan Housing Authority, a non-profit that provides subsidized housing for low- and moderate-income individuals.

The remainder of community development lending was to organizations providing multiple services, including shelter, emergency financial assistance, and counseling to low- and moderate-income families.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions. UNB's flexible lending includes housing and social service products. One of UNB's products, the health care program, is innovative and UNB is the only financial institution in the AA that offers it.

- UNB's Mortgage Assistance Program is a mortgage loan program to assist low- and moderate-income individuals and families in the purchase of permanent, primary housing. Maximum loan amount is \$80,000. The program is based on maximum annual income tied to the number of persons in households. Homes must be owner-occupied and one and two unit dwellings. There is no application fee and the down payment is a minimum of three percent of the sales price. Private mortgage insurance is not required on loan to value of less than 80%. UNB will waive the credit report and processing fees totaling \$425. During 1999 and 2000, the bank originated 100 of these loans totaling \$5,258,172. These loans are included in the bank's HMDA data.
- Health Care Loan Program is a program for uninsured and under-insured patients of Mercy Hospital who have an outstanding hospital bill. During 2000 the bank entered an agreement with the hospital to provide a loan to those patients, including low- and moderate-income persons. The loan is an unsecured no-interest loan for 12-60 months. The Health Care Program was implemented in part to improve the likelihood for home purchase credit approval. Low- and moderate-income people and other under served groups that receive medical treatment at Mercy Medical Center now have a safe guard in place to protect their credit rating. During 2001, the Bank originated 98 Health Care Program Loans of which 75 were to low and moderate-income persons.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in Summit County and Wayne County is weaker than the bank's overall Low Satisfactory performance under the Lending Test. These AAs did not contain low- or moderate-income geographies. Under borrower distribution, the bank did not originate any home mortgage lending to low-income borrowers or home-improvement loans to moderate-income borrowers.

Refer to Tables 1 through 7 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full- Scope Review

The bank's performance under the investment test is rated High Satisfactory. Based on full-scope review, the bank's performance in the Canton-Massillon MSA AA is good.

Refer to Table 10 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

UNB's performance under the Investment Test was evaluated in terms of the volume, the level of innovation and complexity, the responsiveness to 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 availability of investment opportunities is moderate. Several larger institutions with greater resources and financial capabilities fund most complex investments in the assessment area. We identified no opportunities for investments of a complex nature and found no school bonds or street bonds for low- and moderate-income geographies. Most opportunities identified were donations to qualified community groups.

During the review period the bank made 44 investments totaling \$1,643,000.

A large number of UNB's investments were donations to several organizations that provide housing and social services to low- and moderate-income families. One of the two large significant investments addressed an identified community credit need for additional affordable housing. Overall, UNB's investments are not considered innovative or complex. UNB has not taken a leadership position.

UNB's major investments were:

- Funds to purchase a mortgage back security for an affordable housing project in a low-income geography in Alliance, Ohio. This is a 101-unit apartment building. The face value of the bond is \$922,900.
- Donation of a former bank office to the City of Massillon (Stark County). The City used this building to house several government service organizations that provide housing assistance services for low- and moderate-income families and the City's community development department. It is located in a downtown middle-income geography.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Wayne County and Summit County AAs is weaker than the bank's overall High Satisfactory performance under the Investment Test. The bank's representation in these counties is very limited and they had no investments in these AAs that met the CD purpose.

Refer to Table 10 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test is rated High Satisfactory. Based on full-scope review, the bank's performance in the Canton-Massillon MSA AA is good.

Refer to Table 11 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.

Retail Banking Services

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The bank has good banking hours that provide customers with flexible and convenient hours. All UNB offices are full-service.

The Canton-Massillon AA contains 17 full service offices situated mostly in middle- and upper-income geographies. It contains the bank's only low-income and moderate-income branch.

The bank's percent of branches in low-income geographies exceeds the percent of population in low-income geographies. UNB has one branch located in a Canton low-income geography.

The bank's percent of branches in moderate-income geographies is significantly less than the percent of population in moderate-income geographies. However, the bank has good coverage given the reasonable proximity of the moderate-income areas to a UNB branch.

In the City of Canton, the low- and moderate-income areas are within four miles of a UNB branch.

In the City of Alliance, the low- and moderate-income areas are within two miles of a UNB branch.

In the City of Massillon, the moderate-income areas are within two miles of a UNB branch.

Hours at bank branches are similar to those offered by other financial institutions in the area. Saturday hours are offered at all branches, except the bank's downtown locations in Canton and Massillon, Ohio. Typically for banks located in downtown areas with limited retail business, there are no banking hours offered on the weekend. However, the bank does have one full service branch, including an ATM, at a local retail establishment. Although this retail location is in an upper-income geography (Alliance, Ohio) it serves individuals of all income levels, including low- and moderate-income individuals. This location has extended hours Monday through Saturday, 10 A.M. to 8 P.M.

The bank's ATM network is considered reasonable in servicing all segments of the AA, including low- and moderate-income geographies. The bank has 22 ATM locations in this AA. An ATM is located at each branch location, except Massillon's downtown middle-income location. The bank also has six stand-alone cash dispensing ATMs that are located at a hospital, restaurant, an antique mall and three local colleges. The hospital is located in a moderate-income area. The bank's geographic distribution of its ATMs includes 4.55% in low-income geographies that exceeds the percent of population in those geographies, and 9.09% in moderate-income geographies that is less than the percent of population in those geographies.

The bank's opening and closing of branches had a neutral impact on the bank's branch network, including low- and moderate-income geographies. During the review period, the bank opened two new branches and closed two branches in a middle-income geography.

The bank has tailored its services to benefit low-and moderate-income persons in the AA.

- ICAN Direct Rent Program is a program designed for low-income Stark County Mental Health participants who receive social security. Under this program agreements are made between the program participants, their landlords, and the bank. The participant's social security check is directly deposited into a free, no service charge account and their rent is automatically deducted and paid to their landlord by the bank on the same day. This program assists those with maintaining housing responsibility to alleviate slow and nonpayment problems. The bank has ten ICAN Rent clients.
- Stark County Out of Poverty Partnership Individual Development Account (IDA) Asset Management Program. This program provides low-income families life skills training with a financial incentive. A restrictive-saving account is set up that can be used for the down payment on a home or to fund a small business or for secondary education. Participants are provided a 3-to-1 match for every dollar saved. Over a two-year period, participants are required to attend classes covering their desired ambition. The restricted savings account is held at the bank in the form of a Pinnacle CD that was designed for the program. The CD can be opened with as little as \$25. The bank also holds the primary account for the matching funds. The bank has increased the interest rate on the savings account product since its inception. No fees are charged for this savings account. The bank has 32 of these accounts.
- Electronic Transfer Account is a low-cost account designed for those that receive government issued benefits. These customers are partially those that did not have a financial account. UNB began this product in 2000. The bank has 61 of these accounts.
- The CUB Savings Club is a savings program only offered at the Crenshaw Middle School that is located in a moderate-income geography. It has been offered by UNB for four years. There are no fees associated with the program. Accounts can be opened with smaller deposits than UNB's other savings products. The bank has 61 of these accounts.

Community Development Services

UNB's level of community development services is good.

UNB is very active in a large number of community groups, particularly the major organizations, in the assessment area.

- Coleman Outreach Center is an organization that provides services to low- and moderate-income persons, including senior citizens. Services include adult day care, senior housing, and other family services. A bank employee serves as vice president of renovation.
- Stark County Fair Housing Advisory Board is an agency that oversees landlord tenant issues in protection of Fair Housing Laws. The bank's CRA Officer reviewed fair housing cases and advises the agency.
- Stark County Out of Poverty is an agency that provides housing assistance to low- and moderate-income families. The bank's CRA Officer serves on the board of trustees, program planning committee, the finance committee, and the resources committees.
- Community Building Corporation, Inc. is a corporation that addresses issues of low- and moderate-income families that reside in the City of Canton's nucleus. The bank's CRA Officer advises the corporation on the development, implementation, formation and the objectives of the corporation.
- Stark County Housing Task Force is designed to address housing issues of the low- and moderate-income persons that reside in Stark County. The bank's CRA Officer serves on the planning committee and assists in developing housing strategies.
- Neighborhood Housing Services, Inc. of Massillon is a service that provides housing assistance to low- and moderate-income persons. The bank's CRA Officer serves on the program/planning committee.
- YWCA Dollars and Sense is a transitional housing assistance program for homeless families. The program provides economic literacy training. Families live in the YWCA transitional housing complex. The bank's CRA Officer served on the board of trustees. Several other bank employees provided technical assistance on U-Manage software that the bank originally installed for the organization.
- Family Services Ways to Work Family Loan Program is an entity that provides small loans to low-income parents that have trouble obtaining loans. The intent is to provide funds, mostly for purchase or repair of autos, to those families to aid persons attending school and jobs. The loans range from \$750 to \$2,200. UNB provided assistance in financial aspects during the implementation process. The Loan process is not at UNB.
- Quote International of Massillon, Inc. is an organization that provides aid and assistance to speech and hearing impaired and economically disadvantaged women and children. An employee of the bank served as a board member and is the reservation chairman.

- During 2001 the Rural Opportunities Group sponsored six seminars on obtaining home mortgages. Rural Opportunities is a private organization that administers a housing down payment assistance program for low- and moderate-income families. The bank conducted the sessions.
- During 1999 the bank sponsored a "Know Your Credit Seminar" to inform low- and moderate-income persons on understanding a credit bureau report. The bank targeted a low-income census tract in their AA that the bank had limited or no lending activity to hold the seminar. Attendees received a free copy of their credit report. The seminar was organized and conducted by the bank 's CRA Officer and Marketing Director.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in Wayne County and Summit County AAs, is not inconsistent with the bank's overall High Satisfactory performance under the Service Test. In these two AAs, there are no low- or moderate-income geographies.

Refer to Table 11 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/99 to 12/31/00) Investment and Service Tests and CD Loans: (01/25/99 to 10/29/01)	
Financial Institution	Products Reviewed	
UNB, Canton, Ohio	HMDA and Small Loans to Businesses CD loans, investments, and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Canton-Massillon #1320 Wayne County Summit County	Full- Scope Limited- Scope Limited- Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Canton-Massillon MSA 1320

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Canton- Massillon MSA #1320

Demographic Information for Full Scope Area: UNB MSA 1320 - Canton/Massillon						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	82	6.10	18.29	62.20	13.41	0.00
Population by Geography	394,106	3.67	14.83	60.69	20.80	0.00
Owner-Occupied Housing by Geography	105,457	1.90	12.70	64.05	21.35	0.00
Business by Geography	14,082	6.53	10.55	57.80	25.12	0.00
Farms by Geography	825	1.21	2.30	83.39	13.09	0.00
Family Distribution by Income Level	109,517	18.08	18.26	25.33	38.33	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	39,799	6.43	22.57	59.69	11.31	0.00
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below Poverty Level		32,485 46,300 11.24%	Median Housing Value Unemployment Rate (1990 US Census)		55,790 3.47%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census and 2000 HUD updated MFI

The Canton-Massillon Area (MSA 1320) consists of all 82 census tracts in the Canton-Massillon MSA. This area comprises 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 17 full-service branches and 22 ATMs in this AA. The Canton-Massillon Area is primarily urban interspersed with small rural areas like Hartville, Canal Fulton, and Nimishillen Township.

The City of Canton has been identified by the State of Ohio Department of Development as a distressed community and an Ohio Enterprise Zone. The Canton-Massillon AA contains all five or 100% of the bank's low-income areas, four of which are located in and around the downtown Canton 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, of the 6,138 housing units in these tracts, 64% are rental properties with 86% that are occupied. Owner-occupied housing units represent 30% of the total housing units. Most of the housing stock (74%) consists of one-to-four family units. The average home was built in 1943 with an average value of \$21 thousand. Rents in these areas average \$200. The Canton-Massillon AA also contains all moderate-income areas.

The City of Alliance contains one low-income census tract located in the downtown area. That tract contains 1,402 persons with 48% living below the poverty level. The area has a total of 803 housing units with 64% rental properties. Approximately 66% of the housing stock is one-to-four family and owner-occupied housing stock represents 20% of the housing units in the AA. Average age of these units is 54 years with an average value of \$21 thousand. Rents in these areas average \$228.

The 1990 Census Bureau lists AA population at 394,106. According to Dunn and Bradstreet, in 2000 there were 13,673 businesses, 765 were agricultural-related entities. Prominent industries are steel, consumer goods, manufacturing and health services. Major employers include Timken Industries, Diebold, Hoover Industries and Aultman Hospital. As of June 2001 the unemployment rate for Stark County was 4.1% and Carroll County was 4.2%. Both are below the unadjusted Ohio rate of 4.4% and the unadjusted national rate of 4.7%.

Within the City of Canton there has been a trend away from large manufacturing to micro-businesses, entrepreneurship, and a shift to non-manufacturing oriented businesses. Greater emphasis is being placed on public/private partnerships to provide permanent jobs. As an Enterprise Zone, tax incentives are provided to attract industries that diversify the economy and create long-term jobs. Efforts to bring in new business into the area, spur growth of existing businesses, and diversify the economy with high technology jobs are part of the current economic development strategy. Annexation of raw land in outlying areas into the city of Canton is seen as providing space for new industrial parks and development when needed. New federal tax incentives provided through the renewal community initiative to stimulate community development in poor, economically distressed and under-served areas of the community will be pursued for the southeast and southwest portions of the city.

The downtown area has seen a turnaround with various block developments during the 1990's. Projects included Cornerstone Square, a nine-block redevelopment encompassing the Ohio Bureau of Employment Services, Bureau of Workers' Compensation, Start Metropolitan Housing Authority and a parking deck. The Market Avenue remodeling project along the retail corridor revived the appearance of this commercial area. A second parking deck and the Millennium Centre were recently completed. Plans for a new Regional Transit Authority Transfer Facility is still being considered at this time.

Credit needs of the communities were ascertained through discussion with community groups. We contacted two representatives from economic development and affordable housing concerns representing Stark County. Credit needs identified by the groups included affordable housing, new home construction, affordable home improvement loans, renovation loans for rental properties, specialized lending programs to address the small business needs of women and minorities, and a revolving loan fund to encourage small business development.

We identified at least 22 organizations in the area that provide services to low- and moderate-income persons for housing, medical, emergency assistance, food, and entities that assist businesses with financing.

The bank has many competitors that are primarily large multi-billion regional banking institutions including FirstMerit Bank, N.A. with \$10 billion in assets headquartered in Akron, Ohio, Keybank, N.A. with \$76 billion in assets headquartered in Cleveland, Ohio, and Bank One, N.A. with \$41 billion in assets headquartered in Columbus, Ohio. Also, there is a voluminous number of mortgage companies conducting business in the AA.

The City of Canton has various housing programs primarily for emergency assistance, down payment and housing rehabilitation. The State of Ohio also offers similar types of programs.

Appendix C: Tables of Performance Data

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 MSA/assessment area.

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 MSA/assessment area.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. 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 MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 7. Borrower Distribution of Home Improvement Loans - See Table 6.

Table 8. Borrower Distribution of Refinance Loans - See Table 6.

Table 9. 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 10. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

Table 11. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA

Table 1. Lending Volume

LENDING VOLUME												
Geography: OHIO												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000												
MA/Assessment Area (2000):	% 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)	
Full Review:												
MSA 1320 - Canton/Massillon	97.10	751	88,726	1,124	68,377	1	169	9	4,526	1,885	161,798	97.55
Limited Review:												
Summit County	1.40	18	2,777	9	1,402	0	0	0	0	27	4,179	.04
Wayne County	1.50	24	3,196	4	792	1	100	0	0	29	4,088	2.41

* Loan Data as of December 31, 2000. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 25, 1999 to October 29, 2001.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: OHIO					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000				
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									
Full Review:																								
MSA 1320 - Canton/Massillon	561	94.60	1.90	0.89	12.70	6.60	64.05	50.27	21.35	42.25	3.82	0.63	1.10	3.21	7.15									
Limited Review:																								
Summit County	14	2.36	0.00	0.00	0.00	0.00	80.27	78.57	19.73	21.43	0.88	0.00	0.00	0.93	0.64									
Wayne County	18	3.04	0.00	0.00	0.00	0.00	48.06	27.78	51.94	72.22	0.61	0.00	0.00	0.00	0.93									

* Based on 1999 Aggregate HMDA Data Only.

** 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, 1999 TO DECEMBER 31, 2000				
MA/Assessment Area:	Total Home Improvement 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									
Full Review:																								
MSA 1320 - Canton/Massillon	42	89.36	1.90	2.38	12.70	14.29	64.05	61.90	21.35	21.43	.79	0.00	0.37	1.03	0.48									
Limited Review:																								
Summit County	3	6.38	0.00	0.00	0.00	0.00	80.27	100.00	19.73	0.00	0.86	0.00	0.00	1.02	0.00									
Wayne County	2	4.26	0.00	0.00	0.00	0.00	48.06	0.00	51.94	100.00	0.00	0.00	0.00	0.00	0.00									

* Based on 1999 Aggregate HMDA Data Only.

** 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.

*** 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, 1999 TO DECEMBER 31, 2000					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
MSA 1320 - Canton/Massillon	146	96.69	1.90	0.00	12.70	8.22	64.05	55.48	21.35	36.30	0.88	0.00	0.25	0.83	1.70	
Limited Review:																
Summit County	1	0.66	0.00	0.00	0.00	0.00	80.27	100.00	19.73	0.00	0.08	0.00	0.00	0.11	0.00	
Wayne County	4	2.65	0.00	0.00	0.00	0.00	48.06	50.00	51.94	50.00	0.18	0.00	0.00	0.00	0.36	

* Based on 1999 Aggregate HMDA Data Only.

** 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 Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: OHIO															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000															
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
Full Review:															
MSA 1320 - Canton/Massillon	1,124	98.86	7.14	3.56	10.64	13.79	58.06	64.15	24.15	18.51	8.83	12.70	10.19	8.19	9.22
Limited Review:															
Summit County	9	0.79	0.00	0.00	0.00	0.00	81.90	66.67	18.10	33.33	0.43	0.23	0.24	0.85	0.00
Wayne County	4	0.35	0.00	0.00	0.00	0.00	60.97	100.00	39.03	0.00	0.42	0.00	4.35	0.24	0.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 (2000).

Table 6. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: OHIO					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000				
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****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
MSA 1320 - Canton/Massillon	561	94.60	18.08	14.86	18.26	16.30	25.33	19.75	38.33	49.09	3.82	5.28	1.98	2.98	7.08									
Limited Review:																								
Summit County	14	2.36	12.24	0.00	17.06	7.14	24.82	21.43	45.88	71.43	1.05	0.00	0.80	0.93	1.37									
Wayne County	18	3.04	15.80	0.00	16.17	11.11	23.82	5.56	44.21	83.33	0.69	0.00	0.00	0.00	1.65									

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 1.52% 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 7. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															
Geography: OHIO															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000															
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 1320 - Canton/Massillon	42	89.36	18.08	20.51	18.26	30.77	25.33	23.08	38.33	25.64	.79	0.00	1.38	0.46	0.79
Limited Review:															
Summit County	3	6.38	12.24	0.00	17.06	0.00	24.82	50.00	45.88	50.00	0.00	0.00	0.00	0.00	0.00
Wayne County	2	4.26	15.80	0.00	16.17	0.00	23.82	0.00	44.21	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 8.51% 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 8. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: OHIO															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000															
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 1320 - Canton/Massillon	146	96.69	18.08	10.49	18.26	18.18	25.33	20.98	38.33	50.35	.88	0.36	0.78	0.82	1.70
Limited Review:															
Summit County	1	0.66	12.24	0.00	17.06	0.00	24.82	0.00	45.88	100.00	0.10	0.00	0.00	0.00	0.22
Wayne County	4	2.65	15.80	0.00	16.17	25.00	23.82	50.00	44.21	25.00	0.20	0.00	0.00	0.73	0.00

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 1.99% 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.

Table 9. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: OHIO					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000				
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	Rev\$ 1 Million or Less
Full Review:									
MSA 1320 - Canton/Massillon	1,124	98.86	87.85	51.25	85.32	8.81	5.87	8.83	14.15
Limited Review:									
Summit County	9	0.79	86.16	100.00	44.44	33.33	22.22	0.43	0.76
Wayne County	4	0.35	85.22	75.00	25.00	50.00	25.00	0.42	0.59

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2000).

**** 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 0.44% of small loans to businesses originated and purchased by the bank.

Table 10. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: OHIO			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MSA 1320 - Canton/Massillon	0	0	44	1,643	44	1,643	100.00	0	0
Limited Review:									
Summit County	0	0	0	0	0	0	0.00	0	0
Wayne County	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 11. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Evaluation Period: 01/25/1999 TO 10/29/2001							
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of Bank Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)				% of the Population with Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope																	
MSA 1320-Canton/Massillon	97.55	17	80.95	5.88	5.88	47.06	41.18	1	0	0	0	- 1	0	3.67	14.83	60.69	20.80
Limited Scope																	
Summit County	.04	2	9.52	0.00	0.00	100.00	0.00	1	1	0	0	0	0	0.00	0.00	80.87	19.13
Wayne County	2.41	2	9.52	0.00	0.00	0.00	100.00	0	1	0	0	0	1	0.00	0.00	57.70	42.30

* The percentage of the population in the MSA/AA that resides in these geographies.