

PUBLIC DISCLOSURE

April 9, 2001

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Savings Bank & Trust Company
627023
101 West Market Street
Orrville, OH 44667

Federal Reserve Bank of Cleveland

P.O. Box 6387
Cleveland, OH 44101-1387

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The major factors and criteria contributing to this rating include:

- Reasonable geographic distribution of loans dispersed throughout the assessment area;
- Reasonable penetration among individuals of different income levels and businesses of different revenue size;
- Majority of loans and other lending-related activities are in the assessment area;
- More than reasonable Loan-To-Deposit Ratio.

The previous CRA examination on March 17, 1997 resulted in a "Satisfactory" performance rating.

DESCRIPTION OF INSTITUTION

The Savings Bank & Trust Company ("SBT") is a subsidiary of Banc Services Corp., both of which are located in Orrville, Ohio. Banc Service Corp, with total parent company assets of \$14 million, is a debt-free entity that exists solely to hold its investments in SBT, which represents 99.8% of the parent total assets.

As of November 9, 2000, Banc Services Corp. established Access Financial Corp. ("AFC"), a consumer finance company subsidiary in Massillon, Ohio. AFC's primary operations are to finance real estate, consumer and installment loans.

SBT reported assets of \$168 million as of December 31, 2000. Loans constitute approximately 66% of total assets, with consumer loans and real estate loans accounting for 50% of the loan portfolio. In addition, SBT offers a broad range of commercial and retail banking products and services, including small business lending, direct and indirect consumer lending, residential mortgage lending and small farm lending. A table illustrating the bank's loan distribution can be found in *Table 1*. This table shows SBT's loan distribution by dollar amount and percent of loans as of December 31, 2000.

As of June 30, 2000, STB overall deposits share in Wayne County was 8.58%, which ranks SBT fifth in the county's market share. SBT operates seven offices throughout its two assessment areas. The first assessment area discussed within this report encompasses portions of Stark County, which is part of the Canton-Massillon MSA. The other assessment area encompasses the non-MSA of Wayne County, as well as portions of Summit and Medina counties. Each assessment area is discussed in further detail within the report.

SBT competes with some major financial institutions within its assessment area. A detailed listing of specific financial institutions is listed within the assessment area discussion later in the report.

The following table presents several key financial ratios for the bank. Based on SBT's Net Loan & Leases to Total Deposit ratio, the bank has demonstrated their ability to meet the credit needs of its assessment areas by placing back into the community a substantial majority of their deposits in the form of real estate, commercial and consumer loans.

Key Financial Ratios As of December 31, 2000	
Return of Average Assets	0.82%
Net Loans & Leases to Average Assets	65.08%
Investments to Average Assets	28.22%
Total Deposits to Average Assets	84.16%
Net Loans & Leases to Total Deposits	77.33%
1-4 Family Residential Loans to Average Loans	17.94%
Consumer Loans to Average Loans	45.73%
Commercial Loans to Average Loans	17.05%
Agricultural Loans to Average Loans	4.59%

Based on SBT's assets size and financial condition, it has the ability to meet the credit needs of its assessment areas. There are no legal or other impediments that would hamper the bank's ability to meet the community's credit needs.

SCOPE OF EXAMINATION

SBT serves its assessment area through direct, as well as indirect, lending. As such, analyses were conducted on real estate, motor vehicle, other secured-consumer, small business and small farm loans. This bank has two offices in a Metropolitan Statistical Area, which makes it subject to the Home Mortgage Disclosure Act. Therefore, information collected is based on the Home Mortgage Disclosure Act submitted by SBT to this Reserve Bank. The numbers incorporated in the real estate loans include home purchase, refinance, home improvement, construction and junior liens. The category of other secured-consumer is comprised of other household goods, home improvement, other installment loans and single payment loans. The data from July 2000 through December 2000 was reviewed to determine the geographic distribution of the bank's lending, as well as the volume of loans provided to borrowers of different incomes, businesses of varying sizes and revenues, and small farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The table below illustrates the total lending activity of SBT for the sample period. This includes both assessment areas of the bank.

Total Lending Activity Savings Bank & Trust Company July 2000 – December 2000		
	# of Loans	\$ (000's)
Real Estate Loans	84	5,432
Consumer Loans	731	6,954
Small Loans to Business	87	6,055
Small Loans to Farms	24	1,156
TOTALS	926	\$19,597

Loans Inside and Outside the Assessment Area

The table below illustrates that the percentage of loans made within the assessment area is approximately 70% during the evaluation period. One of the products offered by SBT is motor vehicle loans. These loans are part of what makes up the consumer loan numbers in the table below. Most of the motor vehicles loans originated by SBT are submitted to the bank by indirect auto dealers, which means that many of the auto loans originated are loans made outside the bank's assessment. This is primarily due to the location of the dealers submitting applications. In addition, during the six-month evaluation period, SBT also originated 60 loans that were HMDA reportable loans that are not included in the table below. Of the 60 loans, 14 were made within the assessment area. The remaining 46 loans were unable to be geocoded due to the unavailability of addresses, therefore the geographic location of loans is unknown. Overall, a majority SBT's loans originated are in the bank's assessment area.

Savings Bank & Trust Company July 2000 – December 2000								
Loan Type	Inside the Assessment Area				Outside the Assessment Area			
	# of Loans	%	\$ (000's)	%	# of Loans	%	\$ (000's)	%
<i>Real Estate Loans</i>	75	89.3%	4,865	89.6%	9	10.7%	567	10.4%
<i>Consumer</i>	472	64.57%	4,269	61.39%	259	35.43%	2,685	38.61%
<i>Small Loans to Business</i>	81	93.1%	5,757	95.1%	6	6.9%	298	4.9%

Savings Bank & Trust Company July 2000 – December 2000								
Loan Type	Inside the Assessment Area				Outside the Assessment Area			
	# of Loans	%	\$ (000's)	%	# of Loans	%	\$ (000's)	%
<i>Small Loans to Farms</i>	23	95.8%	1,149	99.4%	1	4.2%	7	0.6%
Total	651	70.30%	\$16,040	81.85%	275	29.70%	\$3,557	18.15%

Loan-to-Deposit Ratio

SBT's net loan-to-deposit (NLTD) ratio is reasonable. The bank's NLTD ratio has trended upward over the past eight quarters from 69.97% at March 30, 1999, to 77.33% at December 31, 2000. In comparison, the average NLTD ratio for peer during the same time frame ranged from 72.27% to 76.19%.

The increase in the NLDT ratio over the past eight quarters shows SBT demonstrated their ability to meet the credit needs of its assessment areas by placing back into the community a substantial majority of their deposits in the form of real estate, commercial and consumer loans.

Geographic Distribution

The geographic distribution of consumer, residential mortgage, small business and small farm loans is generally good. The bank's performance among geographies in the Wayne County assessment area was strong, while performance among geographies in the Canton-Massillon assessment area was poor. Refer to the discussions for each assessment area for additional information.

Borrower Distribution

The borrower distribution of consumer, residential mortgage, small business and small farm loans is good in both assessment areas. Consumer, small business and small farm performance was especially strong. Residential real estate performance was not as strong, but this type of lending generally requires a higher level of income to qualify. Refer to the discussions for each assessment area for additional information.

Complaints

Neither SBT nor the Federal Reserve Bank of Cleveland have received any complaints regarding performance under the Community Reinvestment Act.

Compliance with Antidiscrimination Laws

No violations of the substantive provisions of the antidiscrimination laws and regulations were identified. The bank has implemented fair lending policies, procedures and training programs and regularly conducts internal reviews for compliance with policies and procedures.

Community Contacts

Two community contacts were conducted in connection with this performance evaluation. Information provided was taken into account in developing the performance context for the institution.

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CANTON-MASSILLON MSA – STATE OF OHIO

This assessment area consists of one county in the Canton-Massillon Metropolitan Statistical area ("MSA"). Although the MSA includes both Carroll and Stark counties, the bank's assessment area only includes the city of Massillon, in Stark County and the surrounding communities. Within the assessment area, there are no low-income census tracts, four moderate-income census tracts, 10 middle-income census tracts and one upper-income census tract.

INSTITUTION'S OPERATIONS

SBT operates two banking offices in this assessment area. One office is located within the middle- income census tract 7138 and the other is located within the upper-income census tract 7114. The distribution of offices throughout the assessment area provides delivery systems that are readily accessible to all portions of the bank's assessment area.

According to the FDIC/OTS¹ report dated June 30, 2000, SBT's market share of deposits in the Canton-Massillon MSA was 0.56%. First Merit NA and United National Bank and Trust Company were the two major banks in the MSA with a market share of 24.76% and 17.66%, respectively. When analyzing the county markets it should be remembered that SBT is a small bank with assets less than \$250 million. Most of the major competitors within this county are financial institutions with assets of more than \$250 million. Other competitors include Bank One, Fifth Third Bank, Key Bank and National City Bank.

PERFORMANCE CONTEXT

Demographic Characteristics

The population of the Canton-Massillon assessment area, as of the 1990 census, was 70,199, which is 17.8% of the population of MSA 1640 and 0.65% of the State of Ohio. *Table 2* illustrates the demographic and economic characteristics of the bank's assessment area in the MSA.

1 FDIC/OTS Summary of Deposits website:www2.fdic.gov

Income Characteristics

The 1990 median family income for the assessment area was \$33,792, which is slightly more than \$32,485 for the MSA, however, it is less than \$34,351 for the State of Ohio. Based on the 1990 census, of the 15 tracts considered for the analysis, 26.7% are moderate-income.

Families comprise 75.2% of the total households in the assessment area, of which 8.5% were families below the poverty level. Of the families residing in the assessment area, 17.0% are low-income families and 18.5% are moderate-income families. The remaining 64.5% are middle- and upper-income families. Using 1999 projected figures, low-income families decline by 2.56%, however, moderate-income families increase 1.79% when compared to the 1990 census. The trend reflects the improvement in the economy and wages since 1990.

Housing Characteristics

As of 1990, there were 27,322 housing units, of which 88.28% were one-to-four family units, 7.90% were five or more family units, 2.90% were mobile homes, and less than one percent were other units including boarded-up units. Of the housing units in the assessment area, 71.1% were owner-occupied. The Canton-Massillon assessment area reflects a similar percent of owner-occupied units when compared with the MSA of 70.8% owner-occupied units. The median age of the housing stock of the assessment area was 37 years, which represents a rather young stock when compared to 45 years for the MSA housing stock.

Labor, Employment and Economic Characteristics

According to the Labor Market Review², the Canton-Massillon metropolitan area, nonfarm payroll employment in the Canton-Massillon metropolitan area dropped 3,500 below the December 2000 level to 188,600 in January 2001. Declines in retail trade and temporary layoffs of non-teaching personnel in local schools lowered employment in service-producing industries by 2,400 jobs. The workforce in goods-producing industries fell by 1,100 jobs over the month to 55,300 due to seasonal losses in construction and less business in manufacturing. Factory production workers averaged \$13.82 per hour, down 23 cents from December.

Nonagricultural wage and salary employment advanced by 5,200 jobs between January 2000 and January 2001. Expansion in service-producing industries created 4,700 jobs. The leading growth sectors, in order of highest growth, were services and retail trade.

² Bureau of Labor Market Information

Improvements occurred in finance, insurance, real estate, government and wholesale trade. Transportation and public utilities were unchanged. Gains in construction boosted employment in goods-producing industries 500. Manufacturing employment declined slightly over-the-year.

Seasonally adjusted employment in the Canton-Massillon area totaled 192,000 in January 2001, up 1,000 from December 2000. Since January 2000, nonfarm payroll employment rose 5,000 due to growth in services, construction, and retail trade.

According to the Ohio Department of Development, the major employers in Stark County include Alliance Healthcare, Amsted Industries/American Steel, Aultman Hospital, and Canton City Board of Education.

According to the Ohio Job and Family Service's³ report of January 2001 report, the unemployment rate for Stark County was 4.7%, which was comparable to the State of Ohio's unemployment rate of 4.8% for the same time period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Geographic and Borrower Distribution:

The geographic and borrower distribution reflects an adequate penetration of lending throughout this assessment area. In the following illustrations, you will first see an analysis of the geographic distribution of each product, followed by the borrower distribution within the assessment area.

Geographic Distribution:

Table 4 shows the distribution of consumer loans in the low-, moderate-, middle- and upper-income geographies in the assessment area. This analysis compares the percentage of households in a specific geography with the percentage of bank lending in that geography. It is believed that the demand for consumer lending is more accurately gauged by comparing aggregate households in a geography instead of aggregate families. Households are believed to more accurately reflect potential borrowers. Household is a measure of all persons living within the household. Families are persons related by blood, marriage, or adoption within a residence.

The table shows the bank's motor vehicle and other secured consumer lending occurred primarily in middle- and upper-income geographies. The bank originated 7.58% of its motor vehicle loans and 12.50% of its other secured consumer loans in moderate-income geographies compared to 18.6% of the households that reside within the moderate-income geographies. This reflects a poor penetration of consumer loans among geographies.

³ Department of Job and Family Services

Table 5 represents the geographic distribution of the bank's real estate lending. The real estate loans used in the analysis encompasses the following types of lending: construction/development loans, 1-4 family residential first and second mortgages, 1-4 family revolving lines of credit and mobile home loans. This analysis compared the percentage of loans originated and purchased to the percentage of owner-occupied housing units in each geography during the six-month evaluation period. The table illustrates that all loans were made to middle- and upper-income geographies. However, real estate lending opportunities exist in the moderate-income geographies surrounding the downtown area of the city of Massillon, as indicated by the percentage of owner-occupied units located in those geographies and information obtained from community contacts. This reflects a poor penetration of mortgage loans among geographies.

Table 6 and 7 represents the geographic distribution of small business and farm loans, respectively. The percentages are compared to the percentage of businesses and farms located in each geography. Although 100% of the small business and small farm loans were made to the middle-income geographies, the bank only made three small business loans and two small farm loans. As illustrated in the tables, 70.37% of businesses and 88.17% of farms are located in the middle-income geographies. Moderate-income geographies contain 15.47% of businesses and 3.23% of farms. This reflects a poor penetration of small business and small farm loans among geographies.

Borrower Distribution:

Table 8 indicates the number of the bank's consumer lending, by loan type, as a percentage of total loans within each category. Lending levels are compared with the percentage of households within each income classification. As revealed by this table, the bank's lending for the consumer loans equals or exceeds the percentage of low- and moderate-income households in the assessment area. This reflects a good penetration of consumer loans among borrowers of different incomes.

Table 9 depicts the distribution of real-estate loans to low-, moderate-, middle- and upper-income borrowers. The percentage of real-estate loans to low- and moderate-income borrowers is adequate. Although the lending to low-income borrowers is lower than the percentage of families, it is reasonable given this type of lending, by its nature, often times requires higher income levels to qualify. In addition 8.5% of families within the assessment area are below the poverty level.

Table 10 illustrates the loan distribution of small business loans among businesses of different revenue sizes. The bank has shown good responsiveness in its small business lending. As illustrated, 100% of business loans made during the evaluation period were loans to businesses with revenues of \$1 million or less. Additionally, all the small business loans were for loan amounts of less than \$100,000. This reflects an excellent distribution of small business loans to businesses of different revenues.

Table 11 illustrates the bank's small farm lending among farms of different revenue sizes. Although the bank only made two farm loans within the assessment area, they were made to small farms with revenues of \$1 million dollars or less. This is an indication that SBT is being responsive to the credit needs of the small farms in their assessment area.

NONMETROPOLITAN AREA

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WAYNE COUNTY – STATE OF OHIO

The majority of this assessment area is not part of any Metropolitan Statistical Area; therefore, it is comprised of block numbering areas (“BNAs”). BNAs are statistical subdivisions of a county for grouping and numbering blocks in nonmetropolitan counties where local census statistical area committees have not established census tracts. BNAs do not cross county lines.

The assessment area encompasses all of Wayne County and portions of Medina and Summit counties. Wayne County is the portion of the assessment area, which is not part of any MSA; however, Medina and Summit counties are part of the Cleveland and Akron MSAs, respectively. The bank's assessment area only includes a total of five census tracts from these two MSAs. Therefore, since the five census tracts consist of only a small portion of the two counties, they are included in the Wayne County non-MSA analysis. In addition, SBT does not have branches located within any of the census tracts of the MSAs. Further, the counties in the MSAs are made up of middle- and upper-income geographies. Within the assessment area there are no low-income geographies, one moderate-income geography, 27 middle-income geographies and nine upper-income geographies.

INSTITUTION'S OPERATIONS

SBT operates five banking offices in this assessment area. There are two offices in the city of Orrville and one each in the cities of Massillon, Marshallville and Wooster. The distribution of offices throughout the assessment area provides delivery systems that are readily accessible to all portions of the bank's assessment area.

According to the FDIC/OTS⁴ report, dated June 30, 2000, SBT's market share of deposits in Wayne County was 8.58%. Wayne County National Bank of Wooster and First Merit NA were the two major banks in the county with a market share of 22.99% and 22.68%, respectively. When analyzing the county markets, it should be remembered that SBT is a small bank with assets less than \$250 million. Most of the major competitors within this county are financial institutions with assets of more than \$250 million. Other competitors include, but are not limited to, First National and Apple Creek Banking Company.

PERFORMANCE CONTEXT

⁴ FDIC/OTS Summary of Deposits website: www2.fdic.gov

Demographic Characteristics

The population of the Wayne County assessment area, as of the 1990 census, was 128,479, which is 1.18% of the population of the State of Ohio. *Table 3* illustrates the demographic and economic characteristics of the bank's assessment area.

Income Characteristics

The 1990 median family income for the assessment area was \$34,325, which is consistent with \$34,351 for the State of Ohio. Based on the 1990 census, of the 37 tracts considered for the analysis, 2.7% are moderate-income.

Families comprise 76.5% of the total households in the assessment area, of which 7.6% were families below the poverty level. Of the families residing in the assessment area, 14.5% are low-income families and 17.2% are moderate-income families. The remaining 68% are middle- and upper-income families. Using 1999 projected figures, low-income families decline by 1.89%; however, moderate-income families increase 2.12% when compared to the 1990 census. The trend reflects the improvement in the economy and wages since 1990.

Housing Characteristics

As of 1990, there were 47,264 housing units, of which 84.62% were one-to-four family units, 5.96% were five or more family units, 8.48% were mobile homes and less than one percent were other units including boarded-up units. Of the housing units in the assessment area, 70.1% were owner-occupied. The Wayne County assessment area reflects a higher percentage of owner-occupied units when compared with the State of Ohio of 63.1% owner-occupied units. The median age of the housing stock of the assessment area was 28 years, which represents a rather young stock when compared to 38 years for the State of Ohio housing stock.

Labor, Employment and Economic Characteristics

According to the Ohio Department of Development, Wayne County is primarily a farming area, which ranks first in the state in the production of oats, hay, cattle and calves, and dairy products. The County is home to the Ohio Agricultural Research and Development Center. Research at the Center covers the development of agricultural products.

The major employers in Wayne County are the College of Wooster, JM Smucker Company, LuK Inc., Mannesmann AG/Rexroth Corp. and Newell Rubbermaid Inc.

According to the 1999 Ohio Job and Family Services report of January 2001, the unemployment rate for Wayne County was 3.8%, which was better than the State of Ohio's unemployment rate of 4.8% for the same time period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Geographic and Borrower Distribution:

The geographic and borrower distribution reflects a good penetration of lending throughout the assessment area.

Geographic Distribution:

Table 4 shows that the majority of consumer lending is made within the middle- and upper-income geographies. There is only one moderate BNA within this assessment area, which is comprised primarily of the Amish community and farmland. Therefore, during the six-month evaluation period, the table shows an excellent penetration of consumer lending throughout all the geographies of the assessment area.

Table 5 represents the geographic distribution of the bank's real estate lending compared to the percent of owner-occupied housing units in each geography. The table illustrates a similar distribution of real estate loans when compared to the owner-occupied units within the moderate-income geography. However, lending in middle-income geographies is significantly less than the percentage of owner-occupied units in those geographies. The overall lending activity among geographies of varying income levels reflects a good penetration throughout the assessment area.

Tables 6 and 7 represent the geographic distribution of small business loans to businesses and to farms, respectively. The percentages are compared to the percentage of businesses and farms located within each geography.

Table 6 reflects a low penetration of small business loans in the moderate- and middle-income tracts compared to aggregate percentages of businesses within the geographies. Most farms within the bank's assessment area are located in the southern most section of the assessment area. In addition, this area is heavily populated and managed by the Amish community. The Amish community has developed an independent mortgage company that helps lend within their own community, thereby limiting the opportunity for the banking community to extend loans. Despite this lending obstacle, the lending of small farm loans is reasonable across the remaining geographies.

Borrower Distribution:

Table 8 indicates the number of the bank's consumer lending, by loan type, as a percentage of total loans within each category. Lending levels are compared with the percentage of households within each income classification. As revealed by this table, loans to low- and moderate-income borrowers generally exceed the percentage of households. The percentage of secured loans to low-income borrowers is less than the percentage of households because some of the loans in this category are home-equity lines of credit. By the nature of this type of loan, it is often difficult for low-income borrowers to qualify. Overall, the borrower distribution reflects an excellent penetration among individuals of different income levels.

Table 9 depicts the distribution of real-estate loans to low-, moderate-, middle-, and upper-income borrowers. The percentage of real-estate loans to low- and moderate-income borrowers is good. Although the lending to low-income borrowers is lower than the percentage of families, it is reasonable to expect because this type of lending, by its nature, often times requires higher income levels to qualify. In addition, 9.7% of households are below poverty and it is difficult for borrowers at poverty level to qualify for real estate secured loans.

Table 10 illustrates the loan distribution of small business loans among businesses of different revenue sizes. The bank has shown excellent responsiveness in its small business lending. As illustrated, 91% of business loans made in the evaluation period were loans to businesses with revenues of \$1 million or less. Additionally, an average of 79% of the small business loans were loans with amounts of less than \$100,000. This shows that SBT is responsive to the credit needs of small businesses.

Table 11 illustrates the bank's small farm lending among farms of different revenue sizes. The bank has shown good responsiveness in its small farm lending. Of small farm loans, 90% of loans made during the evaluation period were made to farms with gross annual revenues of \$1 million or less. In addition, approximately 90% of the small farm loans were made in amounts of less than \$100,000. This is an indication that SBT is being responsive to the credit needs of the small farms in their assessment area.

APPENDIX A TABLES

Table 1

<i>Loan Distribution as of December 31, 2000</i>		
<i>Loan Type</i>	<i>Dollar Amount (000s)</i>	<i>Percent of Total Loans (%)</i>
<i>Construction and Land Development</i>	856	.78%
<i>Secured by Farmland</i>	3,839	3.51%
<i>1-4 Family Residential</i>	19,619	17.93%
<i>Multi-Family (5 or more) Residential</i>	1,266	1.16%
<i>Commercial</i>	9,156	8.37%
<i>Total Real Estate Loans</i>	34,736	31.75%
<i>Commercial and Industrial</i>	20,762	18.98%
<i>Agricultural</i>	5,406	4.94%
<i>Consumer</i>	49,127	44.91%
<i>Other</i>	61	.06%
<i>Less: Unearned Income</i>	700	.64%
<i>Total Loans</i>	109,392	100%

Table 2

Demographic & Economic Characteristics of the Canton-Massillon MSA Assessment Area	
<i>Assessment Area Population</i>	70,199
<i>Population in Areas:</i> MSA: Canton-Massillon 1320 State: OH	394,106 10,847,115
<u><i>Statewide MSA Median Family Income:</i></u> 1990 Median Family Income for the Assessment Area 1990 Median Family Income for MSA 1320 1990 Median Family Income for the State of Ohio	\$33,792 \$32,485 \$34,351
<u><i>Percentage of Families by Income Level of Families:</i></u> Low-Income Moderate-Income Middle-Income Upper-Income	17.0% 18.5% 25.5% 39.0%
<u><i>Number of Total Housing Units:</i></u> 1-4 Family Residential Multi-Family Mobile Home or Trailer Other (including boarded up units) Owner-Occupied Housing Units Occupied-Rental Housing Units Vacant Housing Units	24,121 2,158 795 248 18,668 7,509 1,122
<u><i>Percentage of Total Housing Units:</i></u> 1-4 Family Residential Multi-Family Mobile Home or Trailer Other (including boarded up units) Owner-Occupied Housing Units Occupied-Rental Housing Units Vacant Housing Units	88.28% 7.90% 2.90% .92% 71.1% 29.8% 4.2%
<i>Median Housing Characteristics:</i> Median Age in Years Median Home Value Median Gross Rent	37 Yrs. \$50,400 \$376

Table 3

Demographic & Economic Characteristics of the Non-MSA Assessment Area	
Wayne County	
<i>Assessment Area Population</i>	128,479
<i>Population in Areas:</i>	
<i>Wayne County</i>	101,461
<i>MSA 1680</i>	2,202,069
<i>MSA 0080</i>	657,575
<i>State: OH</i>	10,847,115
<i>Statewide MSA Median Family Income:</i>	
<i>1990 Median Family Income for the Assessment Area</i>	\$34,325
<i>1990 Median Family Income for the Non-MSA</i>	\$30,562
<i>1990 Median Family Income for MSA 0080</i>	\$35,193
<i>1990 Median Family Income for MSA 1680</i>	\$36,500
<i>1990 Median Family Income for the State of Ohio</i>	\$34,351
<i>Percentage of Families by Income Level of Families:</i>	
<i>Low-Income</i>	14.5%
<i>Moderate-Income</i>	17.2%
<i>Middle-Income</i>	26.2%
<i>Upper-Income</i>	42.1%
<i>Number of Total Housing Units:</i>	
<i>1-4 Family Residential</i>	39,995
<i>Multi-Family</i>	2,817
<i>Mobile Home or Trailer</i>	4,006
<i>Other (including boarded up units)</i>	446
<i>Owner-Occupied Housing Units</i>	33,139
<i>Occupied-Rental Housing Units</i>	12,400
<i>Vacant Housing Units</i>	1,702
<i>Percentage of Total Housing Units:</i>	
<i>1-4 Family Residential</i>	84.62%
<i>Multi-Family</i>	5.96%
<i>Mobile Home or Trailer</i>	8.48%
<i>Other (including boarded up units)</i>	.94%
<i>Owner-Occupied Housing Units</i>	70.1%
<i>Occupied-Rental Housing Units</i>	27.5%
<i>Vacant Housing Units</i>	3.6%
<i>Median Housing Characteristics:</i>	
<i>Median Age in Years</i>	28 Yrs.
<i>Median Home Value</i>	\$63,652
<i>Median Gross Rent</i>	\$372

Table 4

Geographic Distribution of Consumer Loans		State: Ohio					Evaluation Period: July – December 2000			
Assessment Area	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-income Geographies	
	#	% of Total	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans	% of Hhlds	% Bank Loans
Canton-Massillon:										
Motor Vehicle	66	80.49%	0	0	18.6%	7.58%	63.9%	75.76%	17.5%	16.67%
Other secured	16	19.51%	0	0	18.6%	12.50%	63.9%	68.75%	17.5%	18.75%
Wayne County:										
Motor Vehicle	302	77.44%	0	0	2.9%	3.31%	76.1%	73.51%	21.0%	23.18%
Other secured	88	22.56%	0	0	2.9%	0	76.1%	79.55%	21.0%	20.45%

Table 5

Geographic Distribution of Real Estate Loans			State: Ohio				Evaluation Period: July – December 2000			
Assessment Area	Total Real Estate Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans
Canton-Massillon	21	100%	0	0	15.4%	0	68.0%	80.95%	16.6%	19.05%
Wayne County	54	100%	0	0	3.2%	3.70%	74.3%	57.41%	22.5%	38.89%

Table 6

Geographic Distribution of Small Loans to Businesses			State: Ohio				Evaluation Period: July - December 2000			
Assessment Area	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Canton-Massillon	3	100%	0	0	15.47%	0	70.37%	100%	14.16%	0
Wayne County	78	100%	0	0	2.55%	1.28%	75.71%	61.54%	21.74%	37.18%

Table 7

Geographic Distribution of Small Loans to Farms 2000			State: Ohio				Evaluation Period: July - December			
Assessment Area	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans
Canton-Massillon	2	100%	0	0	3.23%	0	88.17%	100%	8.60%	0
Wayne County	21	100%	0	0	3.74%	0	78.19%	71.43%	18.07%	28.57%

Table 8

Borrower Distribution of Consumer Loans: State: Ohio Evaluation Period : July – December 2000										
Assessment Area	Total Consumer Loans		Lower-Income Borrower		Moderate-Income Borrower		Middle-Income Borrower		Upper-Income Borrower	
	#	% of total	% of Hhlds	% Bank loans	% of Hhlds	% Bank loans	% of Hhlds	% Bank loans	% of Hhlds	% Bank loans
Canton-Massillon										
Motor Vehicle	66	80.49%	21.1	28.79%	15.6%	15.15%	22.3%	25.76%	41.0%	21.21%
Other secured	16	19.51%	21.1	12.50%	15.6%	43.75%	22.3%	18.75%	41.0%	18.75%
Wayne County										
Motor Vehicle	302	77.44%	18.3%	22.19%	14.7%	27.15%	21.0%	21.52%	46.0%	25.50%
Other secured	88	22.56%	18.3%	12.50%	14.7%	21.59%	21.0%	32.95%	46.0%	21.59%

Table 9

Borrower Distribution of Real Estate Loans:			State: Ohio				Evaluation Period: July – December 2000			
Assessment Area	Real-Estate Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% Families	% Bank Loans	% Families	% Bank Loans	% Families	% Bank Loans	% Families	% Bank Loans
Canton-Massillon	21	100%	17.0%	4.76%	18.5%	14.29%	25.5%	23.81%	39.0%	42.86%
Wayne County	54	100%	14.5%	3.70%	17.2%	22.22%	26.2%	27.78%	42.1%	40.74%

Table 10

Borrower Distribution of Small Loans to Businesses			State: Ohio		Evaluation Period: July – December 2000		
Assessment Area	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		
	#	% of Total	% of Businesses	% Bank Loans	\$100,000 or Less	> \$100,000 to \$250,000	>\$250,000 to \$1,000,000
Canton-Massillon	3	100%	89.65%	100%	3	0	0
Wayne County	78	100%	86.76%	91.03%	62	6	3

Table 11

Borrower Distribution of Small Loans to Farms		State: Ohio		Evaluation Period: July – December 2000			
Assessment Area	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size		
	#	% of Total	% of Farms	% Bank Loans	\$100,000 or Less	> \$100,000 to \$250,000	>\$250,000 to \$1,000,000
Canton-Massillon	2	100%	98.94%	100%	2	0	0
Wayne County	21	100%	98.47%	90.48%	19	2	0

APPENDIX B

CRA GLOSSARY

Aggregate lending: The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

Block numbering area (“BNA”): Statistical subdivisions of a county for grouping and numbering blocks in nonmetropolitan counties where local census statistical area committees have not established census tracts. BNAs do not cross county lines.

Census tract: Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They 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 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,

Consumer loan: A loan 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 of loans: motor vehicle, credit card, home equity, other secured loan and other unsecured loan.

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 householder 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, 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 applications, the amount of loan requested and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings 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.

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.

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, branch distribution).

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 lenders in the MSA/assessment area.

Metropolitan area: Any primary metropolitan statistical area ("PMSA"), metropolitan statistical area ("MSA"), or consolidated metropolitan area ("CMSA"), as defined by the Office of Management and Budget, with a population of 250 thousand or more and any other area designated as such by the appropriate federal financial supervisory agency.

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.

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.

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

Optional loans: Includes any unreported category of loans for which the institution collects and maintains data for consideration during a CRA examination. Also includes 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.

Small loans to business: A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small loans to farms: 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 thousand or less and are either secured by farmland, including farm residential and other improvements or are classified as loans to finance agricultural production and other loans to farmers.

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.

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.