



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

April 17, 2000

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

Wayne County National Bank

**Charter Number: 828  
Public Square, P.O. Box 757  
Wooster, Ohio 44691**

**Office of the Comptroller of the Currency**

**Cleveland Field Office  
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**NOTE: 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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## General Information

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the CRA performance of **Wayne County National Bank** prepared by the **Office of the Comptroller of the Currency (OCC)** the institution's supervisory agency, as of **April 17, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

## 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. 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. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

**Census Tract (CT)** -Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States 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 United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA)** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan 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% of the median family income.

**Median Family Income (MFI)** The median income determined by the United States 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 United States 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% and less than 120% of the MFI.

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

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

**Small Farm Loans** - Loans with original amounts of \$500 thousand 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 noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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



## Overall CRA Rating

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

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

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

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels reflect an excellent responsiveness by WCNB to the credit needs of its AA.
- An excellent distribution of WCNB's loans among geographies and an excellent distribution among borrowers of different income levels throughout its AA.
- Investments reflect an adequate responsiveness to limited opportunities in the AA.
- Good accessibility of WCNB's offices to geographies and borrowers of different income levels and good responsiveness of WCNB's services to the needs of its AA's.

## **Description of Institution**

Wayne County National Bank (WCNB) is a large community bank headquartered in Wooster, Ohio, which is located in Wayne County, Ohio. WCNB is a wholly owned subsidiary of Wayne Bancorp, Inc., a two-bank holding company also headquartered in Wooster, Ohio. As of December 31, 1999, WCNB reported total assets of \$402 million. WCNB is an intrastate bank with 14 offices serving, in addition to Wayne County, the counties of Holmes and Stark. The four census tracts (CT) in Stark County are in Metropolitan Statistical Area 1320. Since the previous CRA evaluation, WCNB opened three offices, two in Wayne County and one in Holmes County.

WCNB is a full service lender offering various loan and deposit products. WCNB offers a full range of business loans, conventional mortgages, home improvement loans and consumer loans. As of December 31, 1999, net loans represented 65% of total assets and consisted of residential real estate loans (45%), commercial and commercial real estate loans (44%) and consumer loans (11%).

There are no legal, financial or other factors impeding WCNB 's ability to help meet the credit needs of the communities it serves. As of December 31, 1999, WCNB reported Tier 1 capital of \$32 million.

WCNB was rated "Satisfactory" at its last CRA evaluation dated November 17, 1997.

## **Scope of the Evaluation**

The evaluation period for the Lending Test is January 2, 1998 through December 31, 1999. The evaluation period for the Investment Test, Service Test and Community Development loans (CD), is January 2, 1998 through April 17, 2000.

Products included in WCNB's Lending Test analysis included home mortgage loans, small loans to businesses, small loans to farms and CD Loans.

### **Data Integrity**

As part of this CRA evaluation, WCNB's publicly filed information on home mortgage loans, small loans to businesses and small loans to farms was tested for accuracy. The test included an evaluation of WCNB's processes to ensure that data are reliable.

No significant errors were found in the reported data that was reviewed. As a result, this evaluation is based on accurate data.

CD loans, investments and services submitted by WCNB's management were verified to ensure that they met the regulatory definition for CD.



## **Selection of Areas for Full-Scope Review**

WCNB's has two assessment areas (AAs). One AA consists of 4 CT in Stark County, which are in the MSA 1320. The second is the non-MSA AA that is made up of Wayne and Holmes counties. The non-MSA AA was selected for a full scope review. This AA represents WCNB's major markets and accounts for approximately 98% of WCNB's deposits and lending activity during this evaluation period. The ratings are based primarily on conclusions reached in the evaluation of WCNB's performance in this full scope AA.

Refer to Appendix A for additional information regarding which areas received full-scope and limited scope reviews.

## **Ratings**

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

When determining conclusions for the Lending Test, home mortgage products were weighted more heavily than small loans to businesses and farms. This weighting is reflective of the bank's overall higher home mortgage lending volume.

## **Other**

Five community contacts from the non-MSA AA were made during the evaluation. These contacts included a county development council, a downtown development project, two county government offices and a local realtor. The contacts stated the primary credit needs are for loans to businesses for expansion, lending for improvements to existing housing stock, and for affordable housing. The need for affordable housing is prevalent due to high property costs, which are increasing dramatically, and the low availability of "quality" lower-priced homes. Another need mentioned by the two county government offices is for increased consumer education regarding financial services.

## **Fair Lending Review**

A comparative file analysis of indirect auto loans was performed in connection with the evaluation of WCNB's CRA performance, to determine compliance with anti-discrimination laws. The analysis consisted of comparing denied individual female applicants with approved individual male applicants. Underwriting decisions were evaluated to determine whether female applicants were treated similarly to male applicants. No violations of the substantive provisions of the anti-discrimination laws and regulations were identified.

# Conclusions with Respect to Performance Tests

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "outstanding".

#### Lending Activity

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

In the full scope AA, approximately 54% of WCNB's loans originated/purchased during the evaluation period were home mortgage loans; 7% were comprised of small loans to farms with small loans to businesses comprising the majority of the remainder at 39%.

WCNB's lending activity is excellent in the AA. Information on deposit market share compiled by the FDIC for 1999, shows that the bank ranks second out of fourteen banks in deposit market share (22.75%) in Wayne County and sixth out of six banks in Holmes County (1.25%). Based on 1998 HMDA aggregate data, WCNB is the largest originator/purchaser of home improvement loans (18.80%) and second largest originator/purchaser of home purchase loans (9.80%) in the AA. Based on 1998 CRA aggregate data, WCNB is the second largest originator/purchaser of small loans to businesses (20.40%) and largest originator/purchaser of small loans to farms (49.10%) in the AA. WCNB's market share of home purchase loans, home improvement loans, small loans to businesses and small loans to farms exceed its deposit market share in the AA.

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

The geographic distribution of WCNB's home mortgage loans, small loans to businesses and small loans to farms reflects excellent penetration throughout the full-scope AA geographies.

##### *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.

The overall geographic distribution of home mortgage loans is excellent in the full-scope AA.

Home purchase loan geographic distribution is excellent. The home purchase loans made in the bank's moderate-income geography (5%) exceeds the percentage of owner occupied units (3%) that are in that geography. There are no low-income geographies in the AA. The market share for loans made in the moderate-income geography (24.40%) in the AA exceed the overall market share (9.80%) for home purchase loans.

Home improvement loan geographic distribution is excellent. The home improvement loans made in the bank's moderate-income geography (3%) are equal to the percentage of owner occupied units (3%) that are in that geography. There are no low-income geographies in the AA. The market share for loans made in the moderate-income geography (50%) in the AA substantially exceed the overall market share (18.80%) for home improvement loans.

Refinance loan geographic distribution is excellent. The refinance loans made in the bank's moderate-income geography (4%) exceeds the percentage of owner occupied units (3%) in that geography. There are no low-income geographies in the AA. The market share for refinance loans made in the moderate-income geography (32.10%) in the AA exceeds the overall market share (10.50%) for refinance loans.

### ***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.

The geographic distribution of small loans to businesses is excellent in the AA. Small loans to businesses made in the moderate-income geography (5%) exceed the percentage of businesses (2%) that are within that geography. There are no low-income geographies in the AA. The market share for small loans to businesses (39.79%) in the moderate-income geography in the AA exceeds the overall market share (20.40%) for small loans to businesses.

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

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

The geographic distribution of small loans to farms is excellent in the full-scope AA. Small loans to farms made in the moderate-income geography (11%) exceed the percentage of farms (4%) located in that geography. The market share for small loans to farms in the moderate-income geography (100%) substantially exceeds the overall market share for small loans to farms (49.10%).

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

Maps and reports detailing WCNB's lending activity over the evaluation period for home mortgage loans, small loans to businesses and small loans to farms were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

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

A substantial majority of home mortgage loans, small loans to businesses and farms, originated or purchased by WCNB over the evaluation period were within the AA. Ninety percent of the bank's home mortgage loans and 81% of small loans to businesses and farms were within its AA. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

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

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of WCNB's home mortgage loans, small loans to businesses and small loans to farms reflects an excellent dispersion among borrowers of different income levels throughout the full scope AA geographies.

Consideration was given to the inability of low-income families to afford even a low priced home. Using 1990 census data, 9.27% of households in the AA are below poverty level. If we use the updated median family income, for Wayne and Holmes counties, of \$43,200, the income of a low-income borrower would be \$21,600 or less. At this income level, the borrower could purchase a home for \$53,500. The weighted average of median housing is \$65,032. Most present housing stock is out of the affordability range of a low-income borrower. Refer to the Market Profile in Appendix B of this evaluation for more information.

### **Home Mortgage Loans**

Refer to Tables 7, 8, and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan origination's and purchases.

The overall borrower distribution of home mortgage loans is excellent in the AA under full scope review.

Home purchase loan borrower distribution is good. Home purchase loans (6%) made to low-income borrowers is less than the percentage of low income families (16%) in the AA. Home purchase loans (23%) made to moderate-income borrowers is excellent as it exceeds the percentage of moderate income families (18%) in the AA. Market share for loans made to low-income borrowers (11.20%) and moderate-income borrowers (12.50%) exceeds the overall market share (9.80) in the AA for home purchase loans.

Home improvement loan borrower distribution is excellent. Home improvement loans made to low-income and moderate-income borrowers (28% and 33% respectively) exceeds the percentage of low-income (16%) and moderate-income (18%) families in the AA. Market share for home improvement loans made to low-income borrowers and moderate-income borrowers (53% and 28% respectively) exceeds the overall market share (18.80%) in the AA for home improvement loans.

Refinance loan borrower distribution is good. Refinance loans (5%) made to low-income borrowers is less than the percentage of low-income families (16%) in the AA. Refinance loans made to moderate-income borrowers (22%) exceeds the percentage (18%) of moderate-income families in the AA. Market share for refinance loans made to low-income borrowers and moderate-income borrowers (12.5% and 13.5% respectively) exceeds the overall market share (10.50%) in the AA for refinance loans.

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

Refer to Table 10 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.

Borrower distribution of small loans to businesses is excellent. WCNB's small loans to small businesses (100%) exceed the percentage of small businesses (71%) in the AA. The percentage of loans of \$100,000 or less (90%) exceeds the percentage of businesses that are defined as small (71%) in the AA. Market share of small loans made to small business (24.67) exceeds the overall market share (20.40) for small loans to all businesses.

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

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

Borrower distribution of small loans to farms is excellent. WCNB's small loans to small farms (99.29%) exceed the percentage of small farms (98.90%) in the AA. The percentage of loans of \$100,000 or less (95%) is near the percentage of farms that are defined as small (99.29) in the AA. Market share of small loans made to small farms (50.63%) exceeds the overall market share (49.10%) for small loans to all farms.

## **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 lending.

Community Development lending had a positive effect on the Lending Test conclusions for the non-MSA AA.

During the evaluation period, WCNB extended 7 Community Development Loans totaling \$586 thousand. Given the limited opportunity in the AA to engage in CD lending, these CD loans are significant. None of these loans is considered to be complex or innovative. Examples of these loans are as follows.

- Christian Children's Home, a non-profit organization, that houses homeless children. The bank extended funds in the amount of \$486 thousand to finance the residence and provide operating funds.
- Goodwill Industries of Wayne County, a non-profit organization, provides clothing and other goods for low- and moderate-income persons as well as training and employment resources to disabled and economically disadvantaged individuals. The bank extended funds in the amount of \$100 thousand for operating purposes.

## **Product Innovation and Flexibility**

Product innovation and flexibility had a positive effect on the Lending Test conclusions for the non-MSA AA.

WCNB offers a flexible mortgage loan product that serves low- and moderate-income borrowers. The bank's program offers financing up to 97% of loan to value. WCNB originated 31 home mortgage loans totaling \$2.6 million.

Working with Goodwill Industries of Wayne County as a guarantor, WCNB provides funding for Goodwill's "Wheels to Work" Program. The program offers low interest car loans for individuals who are at or below the poverty level. The bank extended 5 loans totaling \$19,687 during this evaluation period.

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

Based on a limited-scope review, the bank's performance under the Lending Test in the MSA1320 (Stark County) is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test.

Refer to Tables 1 through 11 in Appendix C for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Area(s) Receiving Full-Scope Reviews**

The bank's performance under the Investment Test is rated "Low-Satisfactory". Based on a full-scope review, the bank's performance in the non-MSA AA which includes Wayne and Holmes Counties, is adequate.

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, WCNB's CD investments consisted of grants and donations. Discussion with WCNB's personnel and community contacts indicated that opportunities for investment are limited.

**Grants/Donations-** During the evaluation period, WCNB provided 19 grants totaling \$48 thousand to 11 different local non-profit organizations for various projects and initiatives that met the definition of CD.

### **Conclusions for Area(s) Receiving Limited-Scope Reviews**

Based on limited-scope review, the bank's performance under the Investment Test in the Stark County AA is weaker than the bank's overall "Low Satisfactory" performance under the Investment Test.

Although performance in the Stark County MSA AA is weaker, it remains adequate and did not negatively impact the overall conclusion for Investments. The weaker performance is due to the bank having zero investments in this AA which is attributable to very little opportunity in Stark County.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the non-MSA AA, is good.

### **Retail Banking Services**

Refer to Table 13 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.

Accessibility to the bank's delivery systems is considered good in the AA. WCNB's delivery systems are accessible to geographies and individuals of different income



levels throughout the AA. The distribution of WCNB's offices throughout moderate-income geographies (7.69%) exceeds the distribution of population (4.20%) living in such geographies. Branch openings have increased the accessibility of delivery systems in middle- and upper income geographies in the full-scope AA. There were no offices closed during the evaluation period. The effect of the branch openings on the moderate- income geography is neutral.

WCNB's hours and services offered throughout the AA are good. Office hours and services, including the availability of loan officers for all loan products, are comparable among locations regardless of the income level of the geography. Banking hours and services provided Monday through Friday are supplemented by Saturday hours.

WCNB's ATM network offers an effective alternative delivery system for delivering retail banking services in moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, an ATM was located in the only moderate - income geography within the full-scope AA. As a result, the portion of WCNB's ATMs in moderate- income geographies (9.09%) exceeds the portion of the population (4.20%) that resides in those geographies.

Other alternative delivery systems include bank by mail. We could not place significant weight on this alternative delivery system when drawing our CRA performance conclusions because no data was available for an analysis.

## **Community Development Services**

WCNB's performance in providing CD services to its full-scope AA is good.

Major highlights of CD service activities in the full-scope AA during the evaluation period include:

**Mental Health and Recovery Board:** This organization is responsible for allocating state funds and other grants to various service organizations involved in mental health issues. These organizations primarily serve low-income clients who otherwise could not afford these services. A WCNB officer serves as a board member for this organization and provides oversight and technical assistance on financial matters.

**Goodwill Industries:** A WCNB officer is currently serving on the board of this organization. The officer provides oversight and technical assistance on financial matters. Goodwill Industries provides training and employment resources to disabled and other disadvantaged individuals. The majority of its clients are low-income.

**Habitat for Humanity:** This organization provides affordable housing to mostly low-income individuals and families. This is accomplished primarily through a home building partnership between the organization's client and volunteer labor. Typically, once the home is built, the family is able to secure a low- or no-interest mortgage

through Habitat for Humanity. A WCNB officer has served on the board of directors for this organization for the past three years until his retirement from the organization in 1999. During that time, he provided technical assistance on financial matters as well as oversight.

**Salvation Army:**A senior WCNB officer is currently serving as Vice President of this organization and provides managerial and technical assistance on financial matters. The Salvation Army is a broad-based religious social service organization with several programs that focus on homelessness, children and other programs that serve low- and moderate-income individuals.

**Wayne-Holmes Counseling Center:**This organization serves low-income individuals and families by providing counseling services for drug and alcohol abuse, physical abuse and other counseling services. Its clients typically cannot afford to obtain these services. A WCNB officer serves on both the personnel and finance committees of the board of this organization and provides oversight as well as technical assistance on financial matters.

**Ohio State University Extension Office:**Two WCNB employees volunteer as money management counselors. They assist low and -moderate income members of the community, including referrals from the Habitat for Humanity program, in budgeting their finances to attain a particular financial goal.

**Wayne Metropolitan Housing Authority (WMHA):**This organization is responsible for managing approximately 900 rental units occupied by low-income individuals and families. Of the 900 units, WMHA owns 400 and the other 500 are privately owned HUD-approved properties. A WCNB officer served on the WMHA board for the past 13 years until retiring from the board in 1999. During that time, the officer provided oversight and technical assistance in financial matters.

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

Based on a limited-scope review, the bank's performance under the Service Test in the Stark County, MSA 1320, AA is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test.

Refer to Table 13 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 nonmetropolitan areas that received comprehensive examination review (designated by the term  $\Delta$ Full-Scope $\Delta$ ) and those that received a less comprehensive review (designated by the term  $\Delta$ Limited-Scope $\Delta$ ).

<b>Time Period Reviewed</b>	Lending Test: January 2, 1998 to December 31, 1999 Investment Test: January 2, 1998 to April 17, 1999 Service Test: January 2, 1998 to April 17, 1999	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Wayne County National Bank Wooster, Ohio	Home mortgage loans, small loans to businesses and small loans to farms	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>None</i>	None	None
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Non-MSA area of Wayne and Holmes Counties	Full Scope	
MSA 1320, Stark County	Limited Scope	

## Appendix B: Market Profile for Full-Scope Area

### Non-MSA AA/Wayne and Holmes Counties Market Profile

Demographic Information for the Area: WCNB Non-MSA A/A, Wayne and Holmes C										Evaluation Period		
Demographic Characteristic	Total		Low Income Tracts		Mod Income Tracts		Middle Income Tracts		Upper Income Tracts		NA Income Tracts	
	#	%	#	%	#	%	#	%	#	%	#	
Geographies (Census Tracts/BNAs)	38	0.00	0	2.63	1	76.32	29	21.05	8	0.00	0	
Population by Geography	134,310	0.00	0	4.20	5,643	80.03	107,491	15.77	21,176	0.00	0	
Owner-Occupied Housing by Geography	32,541	0.00	0	3.21	1,046	79.04	25,722	17.74	5,773	0.00	0	
Business by Geography	4,733	0.00	0	2.32	110	81.87	3,875	15.80	748	0.00	0	
Farms by Geography	728	0.00	0	3.57	26	83.24	606	13.19	96	0.00	0	
Family Distribution by Income Level	34,997	16.03	5,611	18.15	6,353	25.45	8,906	40.37	14,127	0.00	0	
Distribution of Low and Moderate Income Families throughout AA Geographies	11,964	0.00	0	4.89	585	83.49	9,989	11.62	1,390	0.00	0	
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below Poverty Level	30,563 43,200 9.27%	Median Housing Value Unemployment Rate		50,708 3.05								

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

### DESCRIPTION OF ASSESSMENT AREA

The bank's non-MSA AA is made up of Wayne and Holmes Counties in their entirety. WCNB has 13 offices located throughout this AA. Eleven of the offices are in Wayne County and the remaining two are in Holmes County. As of June 30, 1999, 97% of WCNB's deposits were derived from this AA. Over the evaluation period, 97% of the home mortgage loans, 99% of the small loans to businesses and small farms were derived from this AA.

WCNB's deposits in Wayne County total approximately \$301 million. Based on FDIC deposit market share data as of June 30, 1999, this equates to a 23% deposit market share, ranking WCNB as the second largest deposit taking institution in the county. The leading deposit taking institution has a 25% market share. WCNB's deposits in

Holmes County total approximately \$5.7 million, giving the bank a 1.25% market share. The bank is ranked last in deposit market share among 5 other competitors. The Holmes County market is dominated by two competitors with a much stronger branch presence and a combined 85% market share of deposits.

WCNB also serves the AA with 11 ATMs. The ATMs are located at each WCNB office with the exception of its Bowman Office, which is a limited transaction facility. WCNB's mortgage processing office is a chartered branch, however, it only conducts limited transactions beyond taking loan applications and disbursing loan proceeds.

The Wayne County economy is manufacturing oriented. Wholesale and retail trade is also a primary industry, closely followed by services and government. Wayne County is also one of the most productive agricultural counties in the state of Ohio with 1,620 farms occupying a total of 258,000 acres. The city of Wooster is the retail and economic center of the county. Other larger communities include Orrville, Rittman, and Doylestown. Holmes County is primarily rural with a large Amish population. The town of Millersburg is its retail center.

As of November, 1999 the unemployment level for Wayne county averaged 3.3% and 2.8% in Holmes county and compared to the state unemployment rate of 3.9% and U.S. unemployment rate of 3.8%. Major employers include Rubbermaid Home Products, the Gerstenslager Co., the College of Wooster, Mannesmann Rexroth, LuK Inc., The J.M. Smucker Co., and the Wooster Brush Co.

High land values in many portions of the AA make affordable housing especially difficult for low- and moderate-income residents. Although land is available, the costs of improvements make building affordable homes impractical. Discussions with a local realtor indicate that only a handful of existing properties were available under \$60,000 at the time of the evaluation. According to the county offices that administer the Community Housing Improvement Program (CHIP), many of the homes in this price range are in inferior condition and require rehabilitation in order to bring them up to standard. Based on current interest rates, the updated HUD median family income of \$43,200 and traditional lending standards, this is the maximum home value that low-income families could afford in the AA.

Based on the demographics of the AA and the identified needs of more affordable housing and small business financing, unmet credit and community development needs exist in the AA. A low level of community resources and opportunities for partnerships exist to facilitate activities to address the unmet credit and community development needs of the AA. These conclusions are based on discussions with local government officials, our review of CRA performance evaluations of other financial institutions operating in the AA and discussions with bank management. Both Wayne and Holmes counties participate in the Community Housing Improvement Programs that appear to be the primary opportunities that exist. Other than participating in these projects and supporting the limited number of community organizations through grants and donations, no other community development investment opportunities were

identified in the AA. WCNB actively works with the Wayne County Development Council to generate further economic opportunities.

Because the Wayne and Holmes County AA is not a metropolitan statistical area, HMDA data is not available for home mortgage loans made by non-reporting financial institutions. As a result, home mortgage market share information for this AA is considered less meaningful.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the  $\Delta$  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; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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 rank and 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Farms** The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms

(regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 7. 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 rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** See Table 7.
- Table 10. 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. The table also compares the bank's percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. Borrower Distribution of Small Loans to Farms** Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also compares the bank's percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.



- Table 12. 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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- Table 13. 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 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of the population within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

**Table 1. Lending Volume**

LENDING VOLUME												
Evaluation Period 01/02/1998 TO 12/31/1999												
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Scope</b>												
WCNB Non-MSA A/A	0.00	1,079	78,691	773	36,912	141	4,161	0	0	2000	119,764	97.79
<b>Limited Scope</b>												
WCNB AA-Stark Cd	0.00	33	2,998	11	358	1	200	0	0	45	3,556	2.21

\* Deposit Data as of June 30, 1999

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Evaluation Period 01/02/1998 TO 12/31/1999																
		Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Home Purchase Loans			
		% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**	
<b>Full Scope</b>																		
WCNB Non-MSA A/A, Wayne and Holmes C		0	0	3	5	79	65	18	30	2	9.8	0.0	24.4	9.3	9.9	339	99	
<b>Limited Scope</b>																		
WCNB AA-Stark County-MSA 1320		0	0	0	0	100	100	0	0	28	1.3	0.0	0.0	1.3	0.0	5	1	

\* Based on 1998 Aggregate HMDA Data Only only. Market rank is for all income categories combined.  
 \*\* Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

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

Geographic Distribution: HOME IMPROVEMENT		Evaluation Period 01/02/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography				Total Home Improvement Loans		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
WCNB Non-MSA A/A, Wayne and Holmes C	0	0	3	3	79	80	18	17	1	18.8	0.0	50.0	17.7	24.4	125	97
<b>Limited Scope</b>																
WCNB AA-Stark County-MSA 1320	0	0	0	0	100	100	0	0	10	3.1	0.0	0.0	3.1	0.0	4	3

\* Based on 1998 Aggregate HMDA Data Only only. Market rank is for all income categories combined.

\*\* Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Evaluation Period 01/02/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography			Total Home Mortgage Refinance Loans			
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Upp	#	% of Total**	
<b>Full Scope</b>																
WCNB Non-MSA A/A, Wayne and Holmes C	0	0	3	4	79	76	18	20	3	10.5	0.0	32.1	10.4	9.3	615	96
<b>Limited Scope</b>																
WCNB AA-Stark County-MSA 1320	0	0	0	0	100	100	0	0	7	3.3	0.0	0.0	3.3	0.0	24	4

\* Based on 1998 Aggregate HMDA Data Only only. Market rank is for all income categories combined.  
 \*\* Refinance loans within an MSA/AA as a % of all refinance loans in the rating area.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL BUSINESS		Evaluation Period 01/02/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Small Business Loans		
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
WCNB Non-MSA A/A, Wayne and Holmes C	0	0	2	5	82	84	16	11	2	20.4	0.0	39.7	20.0	18.9	773	99
<b>Limited Scope</b>																
WCNB AA-Stark County-MSA 1320	0	0	0	0	100	100	0	0	21	0.3	0.0	0.3	0.5	0.0	11	1

\* Based on 1998 Aggregate Small Business Data Only. Market rank is for all income categories combined.

\*\* Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

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

Geographic Distribution: SMALL FARM		Evaluation Period 01/02/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Loans Small Farm Loans		
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
WCNB Non-MSA A/A, Wayne and Holmes C	0	0	4	11	83	77	13	13	1	49.1	0.0	100.0	42.0	70.6	141	99
<b>Limited Scope</b>																
WCNB AA-Stark County-MSA 1320	0	0	0	0	100	100	0	0	25	0.0	0.0	0.0	0.0	0.0	1	1

\* Based on 1998 Aggregate Small Business Data Only. Market rank is for all income categories combined.

\*\* Small Farm loans within an MSA/AAA as a % of all Small Farm loans in the rating area.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HMDA HOME PURCHASE		Evaluation Period 01/02/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*				Total Home Purchase Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
<b>Full Scope</b>																
WCNB Non-MSA A/A, Wayne and Holmes C	16	6	18	23	25	31	40	40	2	9.8	11.2	12.5	10.1	10.8	339	99
<b>Limited Scope</b>																
WCNB AA-Stark County-MSA 1320	15	0	21	60	30	20	34	20	28	1.3	0.0	3.1	1.2	1.3	5	1

\* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

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



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

Borrower Distribution: HOME IMPROVEMENT		Evaluation Period 01/02/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*				Total Home Improvement Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
<b>Full Scope</b>																
WCNB Non-MSA A/A, Wayne and Holmes C	16	28	18	33	25	22	40	17	1	18.8	53.6	28.0	13.8	7.6	125	97
<b>Limited Scope</b>																
WCNB AA-Stark County-MSA 1320	15	25	21	25	30	0	34	50	10	3.1	8.3	0.0	0.0	5.0	4	3

\* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

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

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Evaluation Period 01/02/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*				Total Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
<b>Full Scope</b>																
WCNB Non-MSA A/A, Wayne and Holmes C	16	5	18	22	25	29	40	43	3	10.5	12.5	13.5	11.7	11.0	615	96
<b>Limited Scope</b>																
WCNB AA-Stark County-MSA 1320	15	13	21	8	30	25	34	54	7	3.3	5.4	1.3	3.2	5.9	24	4

\* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

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

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL BUSINESS		Evaluation Period 01/02/1998 TO 12/31/1999									
MSA/Assessment Area	Businesses With Revenues of \$1 million or less		% Distribution of Loans by Original Amount of Business Size		Market Share*		Total Small Business Loans				
	% Business***	% Bank Loans***	% Market Loans*	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total	
<b>Full Scope</b>											
WCNB Non-MSA A/A, Wayne and Holmes C	71	100	57	90	95	90	20.4	24.7	698	97	
<b>Limited Scope</b>											
WCNB AA-Stark County-MSA 1320	71	100	56	2	5	10	0.3	0.5	20	3	

\* The market consists of all other Small Business reporters in BANK's assessment area and is based on 1998 Aggregate Small Business Data Only

\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses.

\*\*\* Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 0% of small loans to businesses reported by the BANK.

**Table 11. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL FARM		Evaluation Period 01/02/1998 TO 12/31/1999								
MSA/Assessment Area	Businesses With Revenues of \$ 1 million or less		% Distribution Loans by Original Amount Regardless of Farm Size		Market Share *		Total Small Farm Loans			
	% Farms **	% Bank Loans ***	% Market Loans*	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
<b>Full Scope</b>										
WCNB Non-MSA A/A, Wayne and Holmes C	99	20	47	100	86	1001	49.1	50.6	139	99
<b>Limited Scope</b>										
WCNB AA-Stark County-MSA 1320	99	100	90	0	100	0	0.0	0.0	1	1

\* The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1998 Aggregate Small Business Data Only

\*\* As a Percentage of Farms with known revenues.

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

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS									
Evaluation Period 01/02/1998 TO 12/31/1999									
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Scope</b>									
WCNB Non-MSA A/A, Wayne and Holmes C	0	0	19	48	19	48	100.00	0	0
<b>Limited Scope</b>									
WCNB AA-Stark County- MSA 1320	0	0	0	0	0	0	0.00	0	0

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

\*\* "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

**Table 13. Distribution of Branch Delivery Systems and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM		Evaluation Period 01/02/1998 TO 12/31/1999														
MSA/Assessment Area	Deposits % of Total Bank Deposits	Branches			Location of Branches by Income of Geographies (%)			# of Branch Closing s	# of Branch Opening s	Branch Openings/Closings			Population			
		% of Total Bank Branches	Low (%)	Mid (%)	Upp (%)	Low (%)	Mid (%)			Upp (%)	Low	Mid	Upp	Low	Mid	Upp
<b>Full Scope</b>																
WCNB Non-MSA A/A, Wayne and Holmes C	97	13	0.00	7.69	61.54	30.77	0.00	3	0.00	0.000.0	100.00	0.002	0.00	0.00	0.003	0.0077
<b>Limited Scope.0</b>																
WCNB AA-Stark County-MSA 1320	3	01	0.008	0.00	0.00	100	0.00	0	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00

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

(This table is not needed.)

**Market Profile**

Demographic Information for the Area: WCNB Non-MSA A/A, Wayne and Holmes C												
<b>Evaluation Period 01/02/1998 TO 12/31/1999</b>												
Demographic Characteristic	Total		Low Income Tracts		Mod Income Tracts		Middle Income Tracts		Upper Income Tracts		NA Income Tracts	
	#	%	#	%	#	%	#	%	#	%	#	%
Geographies (Census Tracts/BNAs)	38	0.00	0	2.63	1	76.32	29	21.05	8	0.00	0	0
Population by Geography	134,310	0.00	0	4.20	5,643	80.03	107,491	15.77	21,176	0.00	0	0
Owner-Occupied Housing by Geography	32,541	0.00	0	3.21	1,046	79.04	25,722	17.74	5,773	0.00	0	0
Business by Geography	4,733	0.00	0	2.32	110	81.87	3,875	15.80	748	0.00	0	0
Farms by Geography	728	0.00	0	3.57	26	83.24	606	13.19	96	0.00	0	0
Family Distribution by Income Level	34,997	16.03	5,611	18.15	6,353	25.45	8,906	40.37	14,127	0.00	0	0
Distribution of Low and Moderate Income Families throughout AA Geographies	11,964	0.00	0	4.89	585	83.49	9,989	11.62	1,390	0.00	0	0
Median Family Income	30,563	50,708										
HUD Adjusted Median Family Income for 1999	43,200	3.05										
Households Below Poverty Level	9.27%	Median Housing Value Unemployment Rate										

Source: 1990 US Census and HUD update MFI

**(This table is not needed.) Market Profile**

Demographic Characteristic		Evaluation Period 01/02/1998 TO 12/31/1999											
		Total		Low Income Tracts		Mod Income Tracts		Middle Income Tracts		Upper Income Tracts		NA Income Tracts	
		#	%	#	%	#	%	#	%	#	%	#	%
Geographies (Census Tracts/BNAs)		4	0.00	0	0.00	0	100.00	4	0.00	0	0.00	0	0.00
Population by Geography		18,642	0.00	0	0.00	0	100.00	18,642	0.00	0	0.00	0	0.00
Owner-Occupied Housing by Geography		5,566	0.00	0	0.00	0	100.00	5,566	0.00	0	0.00	0	0.00
Business by Geography		536	0.00	0	0.00	0	100.00	536	0.00	0	0.00	0	0.00
Farms by Geography		82	0.00	0	0.00	0	100.00	82	0.00	0	0.00	0	0.00
Family Distribution by Income Level		5,354	15.22	815	20.79	1,113	29.88	1,600	34.11	1,826	0.00	0	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies		1,928	0.00	0	0.00	0	100.00	1,928	0.00	0	0.00	0	0.00
Median Family Income		32,485	Median Housing Value		56,831								
HUD Adjusted Median Family Income for 1999 Households Below Poverty Level		46,300	Unemployment Rate		4.48%								
		11.24%											

Source: 1990 US Census and HUD update MFI