COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Comptroller of the Currency evaluates our record of helping to meet the credit needs of this community, consistent with safe and sound operations. The Comptroller also takes this record into account when deciding on certain applications submitted by KeyBank. Your involvement in this process is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may request from the Comptroller an announcement of KeyBank applications covered by the CRA and filed with the Comptroller. You may also request complaints or questions using their toll-free telephone number, 1-800-613-6743. You may also ask to see your letter, together with any response by KeyBank, that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments.

If you wish to review information about our CRA performance in other communities we serve, the complete Public File for KeyBank is available at our headquarters location at 127 Public Square, Cleveland, Ohio. You may also review the Public File on computer disks at locations listed below. At least 30 days before the beginning of each quarter, the Comptroller publishes a nationwide list of the banks that are scheduled for a CRA examination in that quarter. This list may be obtained from the Comptroller of the Currency, Bank Supervision – Operations, 250 E Street - SW, Washington, D.C. 20219.

You may send written comments about our performance in helping to meet the community credit needs to: Community Reinvestment Officer and Comptroller of the Currency KeyBank National Association 127 Public Square, 7th Floor Cleveland, Ohio 44114-1306

Your letter, together with any response by KeyBank, will be considered by the Comptroller in evaluating our CRA performance and may be made public. You may also call the Community Reinvestment Officer at this area code 216-763-8000 to ask questions or obtain information about our performance. If you have complaints or questions using their toll-free telephone number, 1-800-613-6743.

We are an affiliate of KeyCorp, a bank and financial services holding company. You may request from the Federal Reserve Bank of Cleveland 1455 East 5th Street Cleveland, Ohio 44114 an announcement of applications covered by the CRA filed by KeyCorp.

REVIEWS THE KEYBANK PUBLIC FILE

To view the KeyBank Public File, contact the CRA Officer at the KeyBank Corporate office listed below:

STATE of OHIO
Corporate Office - Cleveland District
127 Public Square, 7th Floor
Cleveland, OH 44114

or contact the Local CRA Officer at the KeyBank locations listed below:

STATE of ALASKA
Alaska District
101 W. Benson Blvd, Suite 414
Anchorage, AK 99503

STATE of COLORADO
Colorado District
1875 Broadway, Suite 500
Denver, CO 80222

STATE of FLORIDA
dba Key Trust Company
1230 N University Dr.
Fort Myers, FL 33907

STATE of IDAHO
Idaho District
702 West Idaho, 12th Floor
Boise, ID 83701

STATE of IOWA
Central Iowa District
10 West Market St, Suite 900
Indianapolis, IN 46204

STATE of IOWA
Northern Iowa District
202 South Main St, 5th Floor
South Bend, IN 46610

STATE of MAINE
Maine District
One Canal Plaza
Portland, ME 04101

STATE of MICHIGAN
Michigan District
110 South Vine Street, 6th Floor
Ann Arbor, MI 48104

STATE of NEW HAMPSHIRE
New Hampshire District
One Bedford Farms, Kilton Road
Bedford, NH 03110

STATE of NEW YORK
Albany District
66 South Pearl St, 4th Floor
Albany, NY 12207

STATE of NEW YORK
Central New York District
201 South Warren St, 3rd Floor
Syracuse, NY 13202

STATE of NEW YORK
Hudson Valley District
One Washington Center, 5th Floor
Newburgh, NY 12550

STATE of NEW YORK
Rochester District
1200 Bausch and Lomb Place
Rochester, NY 14604

STATE of NEW YORK
Western New York District
50 Fountain Plaza, 6th Floor
Buffalo, NY 14202

STATE of OHIO
Columbus District
BB East Broad Street
Columbus, OH 43215

STATE of OHIO
Dayton District
36 North Main Street
Dayton, OH 45402

STATE of OHIO
Toledo District
333 Fourth Street
Toledo, OH 43664

STATE of OREGON
Oregon District
1211 SW Fifth Ave, Suite 300
Portland, OR 97204

STATE of UTAH
Utah District
50 South Main Street
Salt Lake City, UT 84144

STATE of VERTMO
Vermont District
149 Bank Street
Burton, VT 05738

STATE of WASHINGTON
North Puget Sound District
101 East Holly
Bellingham, WA 98225

STATE of WASHINGTON
Seattle/Everett District
700 Fifth Ave, 49th Floor
Seattle, WA 98104

STATE of WASHINGTON
South Puget Sound District
1301 Pacific Ave, 4th Floor
Tacoma, WA 98402

EQUAL EMPLOYMENT OPPORTUNITY AND EQUALITY OF SERVICE

KeyBank supports equal opportunity and affirmative action in all areas of employment, including recruitment, hiring, placement, training, transfer, promotion, compensation and benefits. Board of Directors membership, and in its service to the general public as customers. This active commitment to affirmative action and equality of service is demonstrated in its policies and accomplished through community interaction. KeyBank offers all persons equal treatment, regardless of race, color, religion, national origin, ancestry, sex, veteran status, age or disability. All KeyBank employees are required to exemplify this affirmative action commitment in a day-to-day basis in their business relationships with other employees and customers. KeyBank recognizes diverse backgrounds of employees in their business experience and education, as well as ethnic and gender diversity, to help promote the best interests of KeyBank’s stockholders, customers and the communities it serves. These objectives reflect KeyBank’s full commitment to equal employment opportunity and equality of service.

WE DO BUSINESS IN ACCORDANCE WITH FEDERAL FAIR LENDING LAWS

UNDER THE FEDERAL FAIR HOUSING ACT, IT IS ILLEGAL, ON THE BASIS OF RACE, COLOR, NATIONAL ORIGIN, RELIGION, SEX, HANDICAP OR FAMILIAL STATUS (HAVING CHILDREN UNDER THE AGE OF 18), TO

• Deny a loan for the purpose of purchasing, constructing, improving, repairing or maintaining a dwelling; or
deny any loan secured by a dwelling; or
discriminate in fixing the amount, interest rate, duration, application procedures or other terms or conditions of such a loan, or in appraising property.

IF YOU BELIEVE YOU HAVE BEEN DISCRIMINATED AGAINST, YOU SHOULD SEND A COMPLAINT TO: Assistant Secretary for Fair Housing and Equal Opportunity
Department of Housing & Urban Development, Washington, D.C. 20410
For processing under the Federal Fair Housing Act, and to:

Customer Assistance Group
Comptroller of the Currency
1301 McKinney Street, Suite 3710
Houston, TX 77010-3031
For processing under Comptroller of the Currency regulations.

UNDER THE EQUAL CREDIT OPPORTUNITY ACT, IT IS ILLEGAL TO DISCRIMINATE IN ANY CREDIT TRANSACTION:

• On the basis of race, color, religion, national origin, sex, marital status, or age (providing the applicant has the legal capacity to enter into a binding contract);
• Because income is from public assistance; or
• Because a right was exercised under the Consumer Credit Protection Act.

IF YOU BELIEVE YOU HAVE BEEN DISCRIMINATED AGAINST, YOU MAY SEND A COMPLAINT TO:

Customer Assistance Group
Comptroller of the Currency
1301 McKinney Street, Suite 3710
Houston, TX 77010-3031

HOME MORTGAGE DISCLOSURE ACT NOTICE (HMDA)

Pursuant to the Home Mortgage Disclosure Act, KeyBank provides housing-related lending activity reports to the public upon request. The data shows the geographic distribution of loans and applications, race, gender, and income of applicants and borrowers, and information about loan approvals and denials. A list of Metropolitan Statistical Areas (MSA - a geographical area made up of a group of census tracts) is included in the KeyBank Public File. You may request data for a specific MSA(s) by contacting KeyBank as listed below:

KeyBank CRA Officer
Corporate Office
127 Public Square - 7th Floor
Cleveland, Ohio 44114-1306
Or by calling 1-800-521-7248 extension 43871

ANNUAL DISCLOSURE STATEMENT NOTICE OF AVAILABILITY

Financial information about this bank is available to our customers, shareholders and the general public upon regular request, including with Federal regulation, to facilitate more informed decision-making by depositors and the general public, we will provide an Annual Disclosure Statement containing financial information for the last two years. This information will be updated each year as of March 31.

To obtain a Copy of the Annual Disclosure Statement, please contact:
KeyBank National Association
Investor Relations
127 Public Square, 11th Floor
Cleveland, Ohio 44114-1306
(216) 689-4221

KBNFA May 2000