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 reviewing 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 review today the public section of our most recent CRA evaluation, prepared by the Comptroller of the Currency, and a list of financial services provided at this KeyCenter branch. You may also request any of the following additional information, which we will provide at this location within five calendar days after you make a request to us:

1. A map showing the assessment area containing this KeyCenter, which is the area in which the Comptroller evaluates our CRA performance in this community.
2. Information about our branch offices in this assessment area.
3. A list of services we provide at those locations, along with data on our lending performance in this assessment area.
4. Copies of all written comments received 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, KeyBank National Association
- Corporate Office, 250 E Street – SW, Washington, D.C. 20219
- Corporate Office, 1455 East Sixth Street, Cleveland, Ohio 44114-1306

Your letter, together with any response by KeyBank, will be considered by the Comptroller in evaluating KeyBank’s full commitment to equal employment opportunity and equality of service.

REVIEWING 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
1675 Broadway, Suite 500
Denver, CO 80222

STATE OF FLORIDA
da Key Trust Company
12830 University Dr. – Fort Myers, FL 33907

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

STATE OF INDIANA
Central Indiana District
10 West Market St, Suite 900
Indianapolis, IN 46204

STATE OF IOWA
Northern Iowa District
202 South Main Street, 5th Floor
Sioux City, IA 51101

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, Kitson 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
88 East Broad Street
Columbus, OH 43215

STATE OF OHIO
Dayton District
34 North Main Street
Dayton, OH 45402

STATE OF OHIO
Toledo District
Three Seagate, 1st Floor
Toledo, OH 43604

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 VERMONT
Vermont District
149 Bank Street
Burlington, VT 05402

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

STATE OF WASHINGTON
Seattle/Everett District
700 5th 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 to a day-to-day basis in their business relationships with other employees and customers. KeyBank recognizes that diversity backgrounds of employees in their business experience and education, as well as ethnic and gender diversity, help to promote the best interest 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 (HUSBAND OR WIFE 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:

For processing under Comptroller of the Currency Act:
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 McKinley Street, Suite 3710
Houston, TX 77019-3031

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. This 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
1-800-527-7248 extension 43871

ANNUAL DISCLOSURE STATEMENT NOTICE OF AVAILABILITY

Financial information about this bank is available to our customers, shareholders and the general public upon request, in accordance with Federal regulations. 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

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