

# LARGE BANK

---

Comptroller of the Currency  
Administrator of National Banks

---

Washington, DC 20219

## Public Disclosure

March 6, 2000

## Community Reinvestment Act Performance Evaluation

United National Bank  
Charter Number: 1427

514 Market Street  
Parkersburg, West Virginia 26101

Office of the Comptroller of the Currency

Mid-Size Banks- East  
830 Morris Turnpike, 2<sup>nd</sup> Floor  
Short Hills, New Jersey 07078

**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.

## Table of Contents

<b>General Information</b> .....	1
<b>Definitions and Common Abbreviations</b> .....	2
<b>Overall CRA Rating</b> .....	5
<b>Description of Institution</b> .....	6
<b>Scope of Evaluation</b> .....	7
<b>Fair Lending Review</b> .....	8
<b>Multistate Metropolitan Area and State Ratings</b>	
Wheeling, WV-OH MSA #9000 .....	9
State of West Virginia .....	16
<b>Appendix A: Scope of Evaluation</b> .....	A-1
<b>Appendix B: Summary of Multistate Metropolitan Area and State Ratings</b> .....	B-1
<b>Appendix C: Market Profiles for Areas Receiving Full-Scope Reviews</b> .....	C-1
<b>Appendix D: Tables of Performance Data</b> .....	D-1

## 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 United National Bank (United) prepared by the **Office of the Comptroller of the Currency (OCC)**, the institutions supervisory agency, as of March 6, 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 **United National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	United National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

### Lending Test

- Lending levels reflect good responsiveness to assessment area credit needs.
- Geographic distribution of loans by income level of geography was good.
- Distribution of loans by income level of the borrower was good.
- An adequate level of Community Development loans were made.
- Flexible lending programs were not used by UNB.
- A majority of the bank's loans were originated within its assessment areas.

### Investment Test

- Given available opportunities, the level of qualified investments was good.

### Service Test

- Delivery systems were reasonably accessible to geographies and individuals of different income levels.
- Service and hours did not vary in a way that inconvenienced portions of assessment area.
- An adequate level of Community Development Services were provided.

## Description of Institution

As of December 31, 1999, United National Bank (UNB), which is headquartered in Parkersburg, West Virginia, had total assets of \$3.4 billion. UNB is an interstate bank operating branches in West Virginia and Ohio. The bank operates 55 offices located in six MSAs (Washington, DC; Wheeling, WV; Steubenville, OH; Parkersburg, WV; Huntington, WV; and Charleston, WV) and several non-MSA counties. Approximately 63% of UNB's deposits and 73% of its loans are in MSAs. UNB is a subsidiary of United Bankshares, Inc. United Bankshares, Inc. was approximately \$5.1 billion in asset size as of year-end 1999 and operates banks headquartered in West Virginia and Virginia.

UNB offers a full range of banking products and services. As of December 31, 1999, loans totaled \$2.3 billion and deposits totaled \$2.2 billion. Loans represent 67% of total assets. The distribution of UNB's loan portfolio was as follows: 1-4 family residential properties (53%); commercial (includes commercial real estate) (31%); consumer loans (10%); other loans (6%) and farm loans (< 1%). UNB is primarily a residential real estate lender and commercial lender. Small farm lending is not a significant product for the bank. UNB's Tier 1 risk based capital to risk weighted assets equals 10% and Tier 1 leverage capital equals 7.4%. There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its assessment area (AA).

The bank operated United Home Lending Services (UHLS) as a subsidiary during 1997 and 1998. As of December 31, 1998, UHLS assets totaled \$44 million and net income equaled \$894 thousand. UHLS was primarily a home purchase and refinance lender originating loans for sale in the secondary market. During 1997 and 1998, UHLS originated 1,642 and 1,142 loans respectively. UHLS lending numbers are included in this evaluation and represent approximately 39% of the bank's HMDA lending activity. UHLS numbers were included at the bank's request. UHLS was merged into UNB during January of 1999. During 1998, the thrift institution Fed One was also merged into UNB. UNB also operates the subsidiary United Brokerage Services, Inc. which has no CRA impact. UNB's CRA



performance was rated "Satisfactory" in the last public evaluation dated October 6, 1997.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation under the lending test covers UNB's performance from January 1, 1997 to December 31, 1998. We reviewed residential mortgage loans subject to filing under HMDA and small business loans. Small farm loans were not reviewed as they are not a significant lending activity of UNB. For the investment and service tests, we reviewed activities from January 1, 1997 to February 29, 2000. We evaluated UNB's performance under the lending test for the years 1997 and 1998 due to the fact that those are the only years that we verified the accuracy of data for UNB. We did not use 1999 lending data as it had not been reviewed for accuracy by the OCC or the bank at the time of our examination. See the following paragraph for more Data Integrity information. We considered investment and service test information up to the time we began the CRA evaluation.

### Data Integrity

We evaluated the accuracy of the 1997 and 1998 HMDA, small business, and small farm loan data during June of 1999. We found the data to be unreliable and required the bank to resubmit accurate data. During December 1999, we evaluated the bank's resubmitted data for 1997 and 1998. We found the data to be reliable. We also reviewed information for the Investment and Service Tests and found the information to be accurate. This evaluation is based on accurate data.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of metropolitan and nonmetropolitan assessment areas (AAs) within that state were selected for full-scope reviews. The areas selected are representative of the types of areas in which the bank operates within West Virginia. Refer to the **AScope** section under the West Virginia State Rating for details regarding how the areas were selected and why they are representative. The Wheeling multistate metropolitan area, in which the bank has branches in more than one state, also received a rating and full-scope review.

### Ratings

UNB's overall rating is a blend of the multistate metropolitan area rating and state rating. In this case, the multistate metropolitan area of Wheeling (MSA # 9000) and the state of West Virginia. The state of West Virginia received the most weight since 85% of UNB's deposits and the majority of bank offices are located

in this rated area. The multistate metropolitan area of Wheeling received the least weight since only 15% of UNB's deposits are located in this rated area.

Based on UNB's lending focus, we placed the most weight on HMDA loans in arriving at our rating. Within HMDA, we placed particular emphasis on home purchase and refinance loans since these products represent a significant portion of the bank's home mortgage activity. Home purchase loans were also identified as a credit need in the community. We also placed a significant amount of weight on small business loans since commercial lending is a significant activity of the bank. Small farm loans were not evaluated since they were not an identified credit need and did not represent a significant lending activity of UNB.

The multistate metropolitan area rating and state rating are based primarily on those areas that received full-scope reviews. Refer to the **AScope@** section under the West Virginia state rating for details regarding how the areas were weighted in arriving at the overall state rating.

### **Fair Lending Review**

A concurrent fair lending review did not identify any violations of the substantive provisions of antidiscrimination laws and regulations. We used a comparative file analysis for home purchase loans originated during 1998. We compared the final credit outcome for black denials to white approvals. The prohibited basis was race.

## Multistate Metropolitan Area Rating

**CRA Rating for the Wheeling, WV - OH MSA #9000** <sup>1</sup>: Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

### Lending Test

- Lending levels reflect good responsiveness to assessment area credit needs.
- Geographic distribution of loans by income level of geography was good.
- Distribution of loans by income level of the borrower was good.
- A good level of community development loans was made.
- Flexible lending programs were not used by UNB.

### Investment Test

- Given available opportunities, the level of qualified investments was adequate.

### Service Test

- Delivery systems were reasonably accessible to geographies and individuals of different income levels.
- Service and hours did not vary in a way that inconvenienced portions of assessment areas.
- An adequate level of community development services was provided.

---

<sup>1</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

## **Description of Institution's Operations in Wheeling, WV-OH MSA #9000.**

Refer to the Market Profile for the Wheeling, WV-OH MSA #9000 Assessment Area in Appendix C for detailed demographics and other performance context information.

### **LENDING TEST**

The bank's performance under the Lending Test is rated **High Satisfactory**. Based on a full scope review, the bank's lending performance in the Wheeling, WV-OH AA is good.

#### **Lending Activity**

Refer to Table 1 in the Wheeling Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect good responsiveness to meeting the credit needs. Relative to its deposit market rank, UNB's HMDA lending levels are good and its small business lending levels are adequate. We did not evaluate small farm loans since this is not a significant lending activity of UNB. At June 30, 1998 UNB ranked second in deposits in the Wheeling MSA with a 15% market share (market share includes deposits from Fed One acquisition). The bank ranked third in overall volume of HMDA lending and sixth in small loans to businesses. In terms of market share, UNB had a HMDA market share of 10% and a market share of 9% of small loans to businesses.

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

The overall geographic distribution of loans in this AA was good. The geographic distribution of HMDA loans was good. The geographic distribution of small loans to businesses was excellent. There were no conspicuous gaps in the bank's lending patterns throughout its AA.

#### ***Home Mortgage Loans***

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

### ***Home Purchase Loans***

The overall geographic distribution of *home purchase loans* was excellent. The bank's percent of home purchase loans in low-income tracts exceeds the percent of owner occupied units in these tracts. The percent of home purchase loans to moderate-income tracts exceeds the percent of owner-occupied units in moderate-income tracts. The bank's home purchase market share in low-income tracts exceeds its overall market share. The bank's market share in moderate-income tracts exceeds its overall market share.

### ***Home Improvement Loans***

The overall geographic distribution of *home improvement loans* was excellent. The bank's percent of home improvement loans in low-income tracts exceeds the percent of owner occupied units in these tracts. The percent of home improvement loans to moderate-income tracts exceeds the percent of owner-occupied units in moderate-income tracts. The bank's market share in low-income tracts exceeds its overall market share. UNB's market share in moderate-income tracts exceeds its overall market share.

### ***Refinanced Loans***

The overall geographic distribution of *refinanced loans* was adequate. The bank originated no refinanced loans in low-income tracts. However, owner occupied housing in low-income tracts is less than one half of 1% of total owner occupied housing in the AA. The percent of refinanced loans in moderate-income tracts was near the percent of owner-occupied units in moderate-income tracts. UNB's market share to low-income tracts was lower than its overall market share. Again, this is mitigated by the fact less than one half of 1% of the AA's owner occupied housing is located in low-income tracts. The bank's market share to moderate-income tracts was lower than its overall market share.

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

Refer to Table 5 in the Wheeling Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The overall geographic distribution of *small loans to businesses* was excellent. The percent of small loans to businesses in low-income tracts exceeds the percent of businesses in these tracts. The bank's percent of small loans to businesses in moderate-income tracts exceeds the percent of businesses located in moderate-income tracts. The market share for small loans to businesses in low-income tracts exceeds the bank's overall market share. The market share of small loans to

businesses in moderate-income tracts exceeds the bank's overall market share.

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

We evaluated the lending distribution of this AA to determine if any unexplained conspicuous gaps existed. No unexplained conspicuous gaps were identified.

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

A majority of the bank's loan originations were in their assessment areas. Overall, 78% of UNB's loan originations were within their AA. By loan product, 75% of HMDA loans and 90% of small loans to businesses was inside the AA. This analysis was performed on the entire bank rather than by AA.

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

The overall distribution of loans by income level in this AA was good. The distribution of HMDA loans by borrower income level was adequate. The distribution of small loans to businesses with annual revenues of \$1 million or less was excellent. The percent of loans to businesses for amounts less than \$100 thousand was good.

### ***Home Mortgage Loans***

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

### ***Home Purchase Loans***

The overall distribution of *home purchase loans* by income level of the borrower was adequate. The bank's percent of home purchase loans to low-income borrowers was somewhat lower than the percent of low-income families residing in the AA. This is somewhat mitigated by the fact that 13% of the families in the AA are below the poverty level. This means that approximately 65% or 6 thousand low-income families live below the poverty level and would have a difficult time purchasing and maintaining a home. The percent of home purchase loans to moderate-income borrowers was near the percent of moderate-income families residing in the AA. UNB's home purchase loan market share to low-income borrowers was somewhat lower than their overall market share. Their market share to moderate-income borrowers exceeds their overall market share.

### ***Home Improvement Loans***



The distribution of *home improvement loans* by borrower income level in the AA was adequate. The bank's percent of home improvement loans to low-income borrowers was somewhat lower than the percent of low-income families residing in the AA (see comments in Home Purchase section regarding the poverty level in this AA). The percent of home improvement loans to moderate-income borrowers was near the percent of moderate-income families residing in the AA. UNB's home improvement market share to low-income borrowers was lower than their overall market share. Their market share to moderate-income borrowers was near their overall market share.

### ***Refinanced Loans***

The overall distribution of *refinanced loans* by borrower income level is adequate. The bank's percent of refinanced loans to low-income borrowers was somewhat lower than the percent of low-income families residing throughout the AA (see comments in the Home Purchase paragraph regarding poverty level). The bank's percent of refinanced loans to moderate-income borrowers was lower than distribution of moderate-income families. UNB's refinanced loan market share to low-income borrowers was lower than its overall market share. Their market share to moderate-income borrowers exceeds their overall market share.

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

Refer to Table 10 in the Wheeling Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall distribution of *small loans to businesses* by income level was excellent. UNB's percent of small loans to businesses (businesses with annual revenues \$1 million dollars or less) exceeds the percentage of small businesses in the AA. The majority of the bank's loans were for amounts less than \$100,000. The market share of small loans to businesses equaled their market share of loans to all businesses.

### **Community Development Lending**

Refer to Table 1 in the Wheeling Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

UNB's level of community development loans in the Wheeling MSA is good based on the available lending opportunities and needs in the assessment area. Refer to the Market Profile section for details on opportunities and needs. The bank made three community development loans during this evaluation period totaling

\$1,344,000. These are qualified community development loans because they provide affordable housing for low and moderate-income individuals.

(1) UNB made a \$1,250,000 loan to construct and provide permanent financing for a forty-four unit multi-family housing project. The project is supported by low-income housing tax credits.

(2) UNB made a \$72 thousand loan to purchase an apartment building. The building contains 11 units. Two of the tenants receive HUD assistance. Based on market rates, the rental rates for the apartments are affordable for low- and moderate-income individuals.

(3) UNB made a \$22 thousand loan to purchase a 5-unit apartment building. Three of the tenants receive HUD assistance. Based on our analysis of market rental rates, the apartments are affordable for low- and moderate-income individuals.

### **Product Innovation and Flexibility**

UNB does not offer innovative or flexible loan products targeted to low- or moderate-income individuals.

### **INVESTMENT TEST**

Refer to Table 12 in the Wheeling Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance in the Wheeling Multistate Metropolitan Area was rated **Low Satisfactory** under the investment test.

Given the limited community development opportunities and needs in the AA, UNB's level of community development investments was adequate. Refer to the Market Profile section for details on needs and opportunities. The bank made \$19 thousand in qualified investments, all of which consisted of contributions to qualified CD organizations. These organizations include a community development corporation involved in small business lending and an organization that promotes economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration or have gross annual revenues of \$1 million or less.

### **SERVICE TEST**

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

The bank's performance under the Service Test in Wheeling, West Virginia is rated **Low Satisfactory**.

### **Retail Banking Services**

Refer to Table 13 in the Wheeling Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

UNB's delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area. The bank has several banking offices and deposit-taking ATMs in the Wheeling assessment area. UNB also has cash dispensing ATMs and a drive-thru branch in the AA. The ATMs did not increase the effectiveness of delivering retail banking services to low and moderate income tracts and to low and moderate income people. In low-income tracts, the percentage of the bank's branches is lower than the population residing in this area. In moderate-income tracts, the percentage of the bank's branches exceeds the percentage of the population residing in these tracts.

The banking services and hours of operation do not vary significantly from one branch to another, but are tailored to meet the needs of the location in which the banking office operates. All of their banking offices are opened until noon on Saturdays.

The bank's record of opening and closing branches has not adversely affected the delivery of retail services to the AA, particularly to low- and moderate-income areas. In 1998 UNB and Fed One Bank merged. As a result, UNB acquired several banking offices in the Wheeling AA. The new offices were located in moderate-income census tracts and middle-income census tracts. During the evaluation period, UNB closed a branch; located in a moderate-income census tract. The branch was consolidated into another UNB office one block away.

### **Community Development Services**

The level of community development services is adequate based on the type of services provided and number of employees who participated. A total of six employees provided financial services to five qualified community development organizations during the evaluation period. A description of these services follows: providing financial advice and loan application review for two organizations involved in providing affordable housing; serving as a council member for an organization involved in education and grants for low- and moderate-income persons; serving as a financial advisor to low- and moderate-income borrowers with an organization involved in affordable housing alternatives; and teaching a homebuyer education seminar to low and moderate income persons for a

community development organization.

## State Rating

<b>CRA Rating for West Virginia<sup>2</sup>:</b>	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>High Satisfactory</u>
<b>The Service Test is rated:</b>	<u>Low Satisfactory</u>

The major factors that support this rating include:

### Lending Test

- Lending levels reflect good responsiveness to assessment area credit needs.
- Geographic distribution of loans by income level of geography is good.
- Distribution of loans by income level of the borrower was good.
- An adequate level of community development loans was made.
- Flexible lending programs were not used by UNB.

### Investment Test

- Given available opportunities, the level of qualified investments was good.

### Service Test

- Delivery systems were reasonably accessible to geographies and individuals of different income levels.
- Service and hours did not vary in a way that inconvenienced portions of assessment areas.
- An adequate level of Community Development Services was provided.

---

<sup>2</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## **Description of Institution's Operations in West Virginia**

UNB operates forty-five banking offices and thirteen ATMs in West Virginia. As of June 30, 1998, UNB had \$2.2 billion in deposits, of which 1.9 billion was in the state of West Virginia. UNB has an 11% market share in the state of West Virginia, which ranks UNB number one in the state in terms of deposit market share. Competition in the state comes from offices of two multinational banks and several large regional and community banks. Approximately 85% of UNB's total deposits and 88% of its loans are located in the state of West Virginia.

UNB serves the following areas on West Virginia: Steubenville MSA, Parkersburg MSA, Huntington MSA, Charleston MSA, and Washington, DC MSA and fourteen Non-MSA counties. UNB has its largest presence in the Non-MSA counties, Parkersburg MSA, and Charleston MSA. UNB has a significant presence in the Huntington MSA and Steubenville MSA. UNB is new to the Washington DC market and has a small presence in that market.

Refer to the Market Profiles for the State of West Virginia in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in West Virginia**

The following AAs received full scope reviews: Parkersburg MSA, Charleston MSA, and the Southern West Virginia (SWV) Non-MSA AA. These full scope areas constitute a representative sample of both significant and less significant markets in which the bank operates. The ratings for the state of West Virginia will primarily be based on the results of those areas that received full scope reviews. Refer to the table in Appendix A for more information.

The Parkersburg MSA, SWV AA, and the Charleston MSA all received equal weight in reaching our conclusions. This is due to the fact that each area represented significant percentages of the bank's deposits in the state of West Virginia. These areas also represent significant percentages of UNB's lending activity within West Virginia.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in West Virginia is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Parkersburg MSA, Charleston MSA and SWV AA is good.

### Lending Activity

Refer to Table 1 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels in areas receiving full scope reviews reflects good responsiveness to meeting the credit needs.

Lending levels in the Charleston MSA reflected good responsiveness to meeting the community credit needs. Relative to its number three deposit share rank, UNB's performance in small business is adequate. The bank's HMDA lending performance is good. We did not evaluate small farm loans since this is not a significant lending activity of UNB. At June 30, 1998 UNB ranked third in deposits in the Charleston MSA with an 11% market share. The bank ranked third in overall volume of HMDA lending and eighth in loans to small businesses. In terms of market share, UNB had a 7% market share in overall HMDA loans and a 6% market share in loans to small businesses.

Lending levels in the Parkersburg MSA reflected good responsiveness to meeting the community credit needs. Relative to its number one deposit share rank, UNB's performance in HMDA loans is good and its performance in making small loans to businesses is good. We did not evaluate small farm loans since this is not a significant lending activity of UNB. At June 30, 1998 UNB ranked first in deposits in the Parkersburg MSA with a 38% market share. The bank ranked second in overall volume of HMDA lending and sixth in small loans to businesses. UNB had a 10% HMDA market share and a 7% market share in small loans to businesses.

Lending levels in the SWV non MSA AA reflected good responsiveness to meeting the community credit needs. Relative to its number one deposit share rank, UNB's performance in originating HMDA loans was good. Their performance in granting small loans to businesses was also good. We did not evaluate small farm loans since this is not a significant lending activity of UNB. At June 30, 1998 UNB ranked first in deposits in the SWV AA with a 24% market share. The bank ranked first in overall volume of HMDA lending and second in making small loans to businesses. The bank's market share of HMDA loans was 17% and their market share of small loans to businesses was 12%.

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

The overall geographic distribution of loans in AAs receiving full-scope reviews was good. The geographic distribution of HMDA loans was good. The geographic distribution of loans to small businesses was good. There were no conspicuous gaps in the bank's lending patterns throughout its AAs.

### ***Home Mortgage Loans***

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

### ***Home Purchase Loans***

The overall geographic distribution of *home purchase loans* is good.

The overall geographic distribution of *home purchase loans* in the Charleston MSA was good. The bank's percent of home purchase loans in low-income tracts exceeds the percent of owner occupied units in low-income tracts. The percent of home purchase loans to moderate-income tracts was lower than the percent of owner-occupied units in moderate-income tracts. The bank's home purchase loan market share in low-income tracts exceeds its overall market share. The bank's home purchase loan market share in moderate-income tracts was lower than its overall market share.

The geographic distribution of *home purchase loans* in the Parkersburg MSA was good. There are no low-income tracts in this AA. The percent of home purchase loans to moderate-income tracts was near the percent of owner-occupied units in moderate-income tracts. The bank's market share for home purchase loans in moderate-income tracts was lower than its overall market share.

The overall geographic distribution of *home purchase loans* in the SWV AA was good. There are no low-income tracts in this AA. The percent of home purchase loans to moderate-income tracts was near the percent of owner-occupied units in moderate-income tracts. The bank's home purchase loan market share in moderate-income tracts equals its overall market share.



### ***Home Improvement Loans***

The overall geographic distribution of *home improvement loans* is excellent.

The geographic distribution of *home improvement loans* in the Charleston MSA was good. The bank made no home improvement loans in low-income tracts. However, the percentage of owner occupied units in these census tracts was less than one half of one percent. Their percentage of home improvement loans in moderate-income tracts exceeds the percentage of owner-occupied units in moderate-income tracts. The bank's market share in low- income census tracts was lower than their overall market share. The bank's home improvement loan market share in moderate-income tracts exceeds its overall market share.

The geographic distribution of *home improvement loans* in the Parkersburg MSA was excellent. There are no low-income tracts in this AA. The percent of home improvement loans to moderate-income tracts exceeds the percent of owner-occupied units in moderate-income tracts. The bank's home improvement loan market share in moderate-income tracts exceeds its overall market share.

The geographic distribution of *home improvement loans* in the SWV AA was excellent. There are no low-income tracts in this AA. The percent of home improvement loans to moderate-income tracts exceeds the percent of owner-occupied units in moderate-income tracts. The bank's home improvement loan market share in moderate-income tracts exceeds its overall market share.

### ***Refinanced Loans***

The overall geographic distribution of *refinanced loans* is adequate.

The geographic distribution of *refinanced loans* in the Charleston MSA was good. The bank originated no refinanced loans in low-income tracts. However, owner occupied housing in low-income tracts is less than one half of one percent. The percent of refinanced loans in moderate-income tracts was lower than the percent of owner-occupied units in moderate-income tracts. The bank's refinanced loan market share in moderate-income tracts exceeds its overall market share.

The geographic distribution of *refinanced loans* in the Parkersburg MSA was adequate. There are no low-income tracts in this AA. The percent of refinanced loans in moderate-income tracts was lower than the percent of owner-occupied units in moderate-income tracts. The bank's refinanced loan market share to moderate-income tracts was somewhat lower than its overall market share.

The geographic distribution of *refinanced loans* in the SWV AA was adequate. There are no low-income tracts in this AA. The percent of refinanced loans in moderate-income tracts was lower than the percent of owner-occupied units in moderate-income tracts. The bank's refinanced loan market share to moderate-income tracts was somewhat lower than its overall market share.

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

Refer to Table 5 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of *small loans to businesses* was good.

The geographic distribution of small loans to businesses in the Charleston MSA was good. UNB's percent of small loans to businesses in low-income tracts exceeds the percent of businesses located in low-income tracts. Their percent of small loans to businesses in moderate-income tracts was lower than the percent of businesses located in moderate-income tracts. Their market share of small loans to businesses in low-income tracts exceeds their overall market share. Their market share in moderate-income tracts exceeds the bank's overall market share.

The geographic distribution of small loans to businesses in the Parkersburg MSA was excellent. There are no low-income tracts in this AA. The bank's percent of small loans to businesses originated in moderate-income tracts exceeds the percent of businesses located in these tracts. The market share of small loans to businesses in moderate-income tracts equaled the bank's overall market share.

The geographic distribution of small loans to businesses in the SWV AA was good. There are no low-income tracts in this AA. The bank's percent of small loans to businesses originated in moderate-income tracts was near the percent of businesses located in moderate-income tracts. The market share of small loans to businesses in moderate-income tracts exceeds the bank's overall market share.

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

We evaluated the lending distribution of this AA to determine if any unexplained conspicuous gaps existed. No unexplained conspicuous gaps were identified.

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

The overall distribution of loans by income level in the AAs was good. The distribution of HMDA loans by borrower income level was adequate. The distribution of small loans to businesses with annual revenues of \$1 million or less

was excellent. The percentage of loans to businesses in amounts less than \$100 thousand was also excellent.

### ***Home Mortgage Loans***

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

### ***Home Purchase Loans***

The overall distribution of *home purchase loans* by borrower income level is adequate.

The distribution of *home purchase loans* by income level of the borrower in the Charleston MSA was adequate. The bank's percent of home purchase loans to low-income borrowers was somewhat lower than the percent of low-income families in the AA. However, twelve percent of the families in the AA live below poverty level, which makes it difficult to afford and maintain a home. Approximately fifty-seven percent of the low-income families in this AA live below the poverty level. The percent of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families residing in the AA. UNB's home purchase loan market share to low-income borrowers was lower than the bank's overall market share. UNB's home purchase loan market share to moderate-income borrowers was lower than the bank's overall market share.

The distribution of *home purchase loans* by income level of the borrower in the Parkersburg MSA was adequate. The bank's percent of home purchase loans to low-income borrowers was somewhat lower than the percent of low-income families in the AA. However, eleven percent of the families live below the poverty level, which makes it difficult to afford and maintain a home. Approximately fifty-two percent of the low-income families in this AA live below poverty level. The percent of home purchase loans to moderate-income borrowers equals the percent of moderate-income families residing in the AA. UNB's home purchase loan market share to low-income borrowers was lower than the bank's overall market share. UNB's home purchase loan market share to moderate-income borrowers was lower than the bank's overall market share.

The distribution of *home purchase loans* by income level of the borrower in the SWV AA was good. The bank's percent of home purchase loans to low-income borrowers was near the percent of low-income families in the AA. This is noteworthy since twenty-one percent of the families in this AA live below the poverty level, which makes it difficult to afford and maintain a home. Approximately eighty-eight percent of the low-income families in this AA live below poverty level. The percent of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families residing in the AA. UNB's home purchase loan market share to low-income borrowers was somewhat lower than their overall market share of home purchase loans. Their market share to moderate-income borrowers was somewhat lower than their overall home purchase loan market share.

### ***Home Improvement Loans***

The overall distribution of *home improvement loans* by borrower income level in the AA was good. For information regarding the percentage of families living below the poverty level refer to the discussion of Home Purchase loans for each AA.

The bank's distribution of home improvement loans by borrower income level in the Charleston MSA was good. The bank's percent of home improvement loans to low-income borrowers exceeds the percent of low-income families in the AA. The percent of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families in the AA. UNB's home improvement market share to low-income borrowers was near the bank's overall market share. UNB's home improvement loan market share to moderate-income borrowers was near the bank's overall market share.

The bank's distribution of home improvement loans by borrower income level in the Parkersburg MSA was good. The bank's percent of home improvement loans to low-income borrowers was near the percent of low-income families in the AA. The percent of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families in the AA. UNB's home improvement market share to low-income borrowers was near the bank's overall market share. UNB's home improvement loan market share to moderate-income borrowers was near the bank's overall market share.

The bank's distribution of home improvement loans by borrower income level in the SWV AA was excellent. The bank's percent of home improvement loans to low-income borrowers exceeds the percent of low-income families in the AA. The percent of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families in throughout the AA. UNB's home improvement market share to low-income borrowers was lower than their overall home improvement loan market share. Their market share to moderate-income borrowers exceeds the bank's overall market share.

### ***Refinance Loans***

The overall distribution of *refinanced loans* by borrower income level is adequate. For information regarding the percentage of families living below the poverty level refer to the discussions of Home Purchase loans for each AA.

The distribution of refinanced loans by borrower income level in the Charleston MSA was adequate. The bank's percent of refinanced loans to low-income borrowers was somewhat lower than the percent of low-income families residing in the AA. The bank's percent of refinanced loans to moderate-income borrowers was near the distribution of moderate-income families residing throughout the AA. UNB's refinanced loan market share to low-income borrowers was near its overall market share. The bank's refinanced loan market share to moderate-income borrowers was lower than the bank's overall market share.

The distribution of refinanced loans by borrower income level in the Parkersburg MSA was adequate. The bank's percent of refinanced loans to low-income borrowers was somewhat lower than the percent of low-income families residing in the AA. The bank's percent of refinanced loans to moderate-income borrowers was near the distribution of moderate-income families residing in the AA. UNB's refinanced loan market share to low-income borrowers was somewhat lower than its overall market share. The bank's refinanced loan market share to moderate-income borrowers equals the bank's overall market share.

The distribution of refinanced loans by borrower income level in the SWV AA was adequate. The bank's percent of refinanced loans to low-income borrowers was lower than the percent of low-income families residing throughout the AA. The bank's percent of refinanced loans to moderate-income borrowers exceeds the distribution of moderate-income families residing throughout the AA. UNB's refinanced loan market share to low-income borrowers was somewhat lower than its overall market share. The bank's refinanced loan market share to moderate-income borrowers was near the bank's overall market share.

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

Refer to Table 10 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall distribution of *small loans to businesses* by income level was excellent.

The distribution of small loans to businesses in the Charleston MSA was excellent. UNB's percentage of small loans to small businesses (businesses with annual revenues \$1 million or less) exceeds the percentage of small businesses in the AA. UNB's market share of small loans to small businesses equaled their overall market share of small loans to all businesses. The majority of UNB's small loans to businesses were for amounts \$100,000 or less.

The distribution of small loans to businesses in the Parkersburg MSA was excellent. UNB's percentage of small loans to small businesses (businesses with annual revenues \$1 million or less) exceeds the percentage of small businesses in the AA. UNB market share of small loans to small businesses exceeds their overall market share of small loans to all businesses. The majority of UNB's small loans to businesses were for amounts less than \$100,000.

The distribution of small loans to businesses in the SWV AA was excellent. UNB's percent of small loans to small businesses (businesses with annual revenues \$1 million or less) exceeds the percent of small businesses in the AA. The bank's market share of small loans to small businesses exceeds their overall market share of all small loans to all businesses. The majority of UNB's small loans to businesses were for amounts \$100,000 or less.

### **Community Development Lending**

Refer to Table 1 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

UNB's level of community development loans is adequate based on the available lending opportunities within the bank's AA. In the Parkersburg MSA, UNB made a \$1 million construction/permanent financing loan on a forty-four unit multi-family housing project. The project is supported by low-income housing tax credits and will house low and moderate income families. This is a qualified community development loan because it provides affordable housing for low- and moderate-income individuals. UNB did not make any community development loans in the Charleston and Southern WV assessment areas during this evaluation period.

### **Product Innovation and Flexibility**

UNB does not offer innovative or flexible products targeted to low- or moderate-income individuals.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Huntington MSA, Steubenville MSA, and Non MSA West Virginia is not inconsistent with the bank's overall High Satisfactory performance under the Lending Test in West Virginia. In the Washington, DC MSA the bank's performance is weaker than the bank's overall performance in the state. This performance is considered weaker due to the low amount of loans made. UNB is relatively new to this market and has a small number of banking offices in the AA. Performance in this area did not effect the bank's overall rating. Refer to Tables 1 through 11 in the state of West Virginia section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 12 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in West Virginia is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in Parkersburg and SWV is adequate. The performance in the Charleston MSA is excellent.

Given the available community development opportunities, needs and dollar amount of investments in the Charleston AA, UNB's performance is excellent. Refer to the Market Profile section for details on needs and opportunities. During this evaluation period, the bank made \$8.4 million in qualified investments. Of this amount, \$8.2 million is attributed to a mortgage backed security. All of the mortgage loans were to low- and moderate-income individuals in Kanawha County. Another \$50 thousand is attributed to a West Virginia Housing Development Fund Bond. This \$250 thousand bond supports multi-family low- and moderate income housing throughout the state of West Virginia. This bond is allocated to all AAs in the state based on their relative proportion of the bank's deposits. Housing supported by this bond qualifies under HUD's Section 8 Rental Assistance Payment Program. These are qualified community development investments because they provide affordable housing to low- and moderate-income individuals. The remaining \$95 thousand of qualified investments in the Charleston MSA consists of contributions to qualified CD organizations involved in: affordable housing; promoting economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration or have gross annual revenues of \$1 million or less; and community services for low- and moderate-income individuals.

Given the available community development investment opportunities and needs in the Parkersburg AA, UNB's performance is adequate. Refer to the Market Profile section for details on needs and opportunities. During this evaluation period, the bank made \$117 thousand in qualified investments. Of this total, \$50 thousand is attributed to the West Virginia Housing Development Fund Bond discussed above. The remaining \$67 thousand of qualified investments in the Parkersburg MSA consists of contributions to qualified CD organizations involved in: affordable housing; promoting economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration or have gross annual revenues of \$1 million or less; and community services for low and moderate income individuals.

Given the available community development opportunities and needs in the SWV Non-MSA AA, UNB's performance is adequate. Refer to the Market Profile section for details on needs and opportunities. During this evaluation period, the bank made \$113 thousand in qualified investments. Of this total, \$65 thousand is attributed to the West Virginia Housing Development Fund Bond discussed above. The remaining \$48 thousand consisted of contributions to qualified CD organizations. These organizations include: two organizations involved in promoting economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration or have gross annual revenues of \$1 million or less; and an organization involved in providing community development services to low- and moderate-income individuals.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the Huntington MSA, Steubenville MSA, Washington, DC MSA, and Non MSA West Virginia is not inconsistent with the bank's overall Low Satisfactory performance under the Investment Test in West Virginia. Refer to Table 12 in the state of West Virginia section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the Service Test in West Virginia is rated **Low Satisfactory**. Based on full-scope reviews, the bank's performance in the Parkersburg MSA, Charleston MSA and the SWV Non-MSA areas are adequate.

### **Retail Banking Services**

Refer to Table 13 in the state of West Virginia section of Appendix D for the facts



and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

UNB's delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area.

In the Charleston MSA, the bank has several branches and deposit taking ATMs. The bank also has cash dispensing ATMs in this assessment area. These ATMs did not increase the effectiveness of delivering retail banking services to low- and moderate-income tracts and to low- and moderate-income people. In low-income tracts, the percentage of the bank's branches exceeds the population in these tracts. The bank has no branches in moderate-income tracts.

In the Parkersburg MSA, the bank has several banking offices and no deposit taking ATMs. However, they do have several cash dispensing ATMs in this assessment area. These ATMs did not increase the effectiveness of delivering retail banking services to low- and moderate-income tracts and to low- and moderate-income people. There are no low-income tracts. In moderate-income tracts, the percentage of the bank's branches exceeds the population residing in these tracts.

In the Southern WV assessment area, the bank has several branches and deposit taking ATMs. The bank also has cash dispensing ATMs in the assessment area. These ATMs did not increase the effectiveness of delivering retail banking services to low and moderate income tracts and to low and moderate income people. There are no low-income tracts in this AA. In moderate-income tracts, the percentage of the bank's branches is near the percentage of the population residing in these tracts.

The banking services and hours of operation do not vary from one branch to another, but are tailored to meet the needs of the location in which the banking office operates. The majority of the bank's drive-ins, including ones located in moderate-income areas are open on Saturdays until noon.

The bank's record of opening and closing branches has not adversely affected the delivery of retail services to the AA, particularly to moderate-income areas. No branches were opened or closed during this evaluation period in the bank's assessment areas.

### **Community Development Services**

The overall level of community development services is adequate.

The level of community development services provided in the Charleston AA is

good based on the number of employees participating and number of organizations benefiting. Thirteen employees provided financial services to seven community development organizations. These services include: serving as a board member for three organizations involved in affordable housing for low- and moderate-income individuals; serving as a Board member for two organizations involved in home ownership counseling for low- and moderate-income individuals; serving as President and offering financial guidance to an organization involved in child welfare for low- and moderate-income persons; and serving on finance committee of an organization which helps low- and moderate-income families contact social assistance agencies.

The level of community development services in the Parkersburg AA is adequate based on the number of organizations benefiting and number of employees participating. Five employees provided financial services to five community development organizations. Services provided included: serving as a Board member for an organization involved in affordable housing; assisting in fund raising activities for an organization involved in affordable housing; serving as a Board member for an organization which provides home buyer counseling for low- and moderate-income individuals; providing home buyer counseling and education for low- and moderate-income individuals; and serving as President of an organization which works with low- and moderate-income individuals.

The level of community development services in the SWV Non-MSA AA is adequate based on the number of employees participating and organizations that benefit from these services. Three employees provided financial services to three community development organizations. These services include: assisting with budgeting and application of grant money for an organization which rehabilitates low- and moderate-income housing; serving as a Board member on a Community Development Corporation; and assisting in loan structuring for an agency which helps provide affordable housing.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Huntington MSA, Steubenville MSA, and Non MSA West Virginia is not inconsistent with the bank's overall Low Satisfactory performance under the Service Test in West Virginia. In the Washington, DC MSA the bank's performance is stronger than the bank's overall performance in West Virginia. The bank has both its branches in the Washington, DC MSA in moderate-geographies and demonstrated a net gain of two branches in moderate geographies. Performance in this area did not effect the bank's overall rating. Refer to Table 13 in the state of West Virginia section of Appendix D 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 "Full-Scope") and those that received a less comprehensive review (designated by the term "Limited-Scope").

<b>Time Period Reviewed</b>	Lending Test: (January 1, 1997 to December 31, 1998) Investment Test: (January 1, 1997 to February 29, 2000) Service Test: (January 1, 1997 to February 29, 2000)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
United National Bank (UNB) Parkersburg, West Virginia	HMDA Loans Small Business Loans Community Development Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Wheeling, WV-OH MSA #9000 Charleston MSA #1480 Parkersburg MSA #6020 Southern WV Non MSA Non MSA AA Steubenville MSA #8080 Washington, DC MSA #8840 Huntington MSA #3400	Full Scope Full Scope Full Scope Limited Scope Limited Scope Limited Scope Limited Scope	None.

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		UNITED NATIONAL BANK		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
United National Bank	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Wheeling, WV-OH #9000	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
West Virginia	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Test in the overall rating.

## Appendix C: Market Profiles for Full-Scope Areas

---

### Table of Contents

#### Market Profiles for Areas Receiving Full-Scope Reviews

Wheeling, WV-OH MSA #9000 .....	C-2
State of West Virginia .....	C-4

## Wheeling, WV-OH MSA #9000

Demographic Information for Full-Scope Area: Wheeling, WV-OH MSA #9000						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	50	2%	16%	62%	18%	2%
Population by Geography	159,301	1%	8%	73%	19%	0%
Owner-Occupied Housing by Geography	45,485	0%	6%	74%	20%	0%
Businesses by Geography	4,913	2%	25%	50%	23%	0%
Farms by Geography	173	0%	2%	84%	14%	0%
Family Distribution by Income Level	44,503	20%	18%	22%	40%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	17,112	1%	11%	77%	11%	0%
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$27,287 = \$34,100 = 16.64%	Median Housing Value Unemployment Rate				= \$43,570 = 4.75%

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

Wheeling is located on the Ohio River bordering the states of Ohio and Pennsylvania. The city is 59 miles southwest of Pittsburgh and is in the heart of both a major trucking route, 1-70, and a major shipping route, the Ohio River. Major employing industries include health services, retail, coal and other manufacturing, and education. Major employers include the Wheeling Hospital, Consolidation Coal, Bayer Corporation, Ohio Valley Medical Center, and local governments. The unemployment rate is the lowest it has been in twenty years in this MSA.

UNB operates ten branches and three ATMs in the Wheeling multistate metropolitan area. Three of the branches and two ATMs are located in Ohio with the remaining branches and ATMs in West Virginia. There is one AA for this multistate metropolitan area and the AA includes the entire metropolitan area. Approximately 15% of UNB's total deposits and 12% of its loans originated during the evaluation period are located in this AA. Major competitors in the AA include several community banks, a branch of a multinational bank, and two offices of regional banking companies. UNB ranks eighth in deposits in Belmont County Ohio with 5% market share. In the West Virginia portion of the AA, UNB ranks second in deposits in Ohio County and Marshall County with 21% and 32% market shares respectively.

UNB's primary business focus in this AA is residential real estate lending. The bank also engages in significant small business lending in this AA.

We reviewed prior community contact forms and the Consolidated HUD plan for the MSA. We also made two community contacts to determine the community credit and development needs. We contacted two regional community organizations that provide affordable housing for low and moderate-income individuals. Our contacts identified affordable housing loans either directly through banks or through nonprofit agencies as a credit need. Additionally, small business and start up business loans were identified as credit needs.

Based on our contacts and review, the level of available qualified investments in this AA is very limited; however, community Development opportunities were identified in low- and moderate-income multi-family housing. There is not enough low- and moderate-income housing stock in the AA. Also, consumer credit counseling for low- and moderate-income persons who do not know how to deal with banks or reestablish credit was identified as a need.

## State of West Virginia Full-Scope Areas

### Charleston MSA #1480

Demographic Information for Full-Scope Area: Charleston MSA #1480						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	61	2%	21%	56%	21%	0%
Population by Geography	250,454	1%	19%	58%	23%	0%
Owner-Occupied Housing by Geography	71,089	1%	17%	58%	24%	0%
Businesses by Geography	8,966	13%	19%	45%	23%	0%
Farms by Geography	93	1%	12%	58%	29%	0%
Family Distribution by Income Level	71,638	21%	18%	21%	40%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	28,316	1%	26%	59%	14%	0%
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$30,296 = \$38,900 = 14.57%	Median Housing Value Unemployment Rate				= \$56,771 = 4.05%

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

The city of Charleston, which is the state capital, is located on the Kanawha River in south central West Virginia. It is at the junction of three interstate systems. Its economy is heavily based on the chemical industry. Major employing industries include government, health services, retail, chemical production, and education. Major employers include state government, Charleston Area Medical Center, Kanawha County Schools, Union Carbide Corporation, and the federal government. Due to its industrial diversity and numerous job opportunities, Kanawha County is a major employment center for eight surrounding counties.

UNB has one AA area within the Charleston MSA. This AA includes the entire metropolitan area. UNB operates seven branches and four ATMs in this AA. This AA has 20% of UNB's deposits and 21% of the loans originated during this evaluation period. Major competitors in the AA include several community banks, two multinational banks and two regional banking companies. UNB ranks fourth in deposits in Putnam County with 5% market share and fourth in Kanawha County with 13% market share.



UNB's primary business focus in this AA is residential real estate lending. The bank also engages in significant small business lending in this AA.

We reviewed prior community contact forms and the Consolidated HUD plan for the MSA. We also made two community contacts to determine the community credit and development needs of the AA. We contacted two regional community organizations that provide affordable housing for low and moderate-income individuals. Our contacts identified affordable housing loans directly through banks or nonprofit agencies as a credit need. Also, consumer credit counseling for low and moderate-income persons who do not know how to deal with banks or reestablish credit was identified as a need.

There are a low level of available community development loan and investment opportunities in the Charleston MSA. Community Development opportunities include: providing home ownership, micro-enterprise and banking education; and increasing financial and technical assistance resources for small business and micro-enterprise development.

## Parkersburg MSA #6020

Demographic Information for Full-Scope Area: (Parkersburg MSA #6020)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	0%	19%	61%	20%	0%
Population by Geography	104,913	0%	12%	70%	18%	0%
Owner-Occupied Housing by Geography	30,569	0%	10%	70%	20%	0%
Businesses by Geography	3,373	0%	28%	59%	13%	0%
Farms by Geography	143	0%	8%	77%	15%	0%
Family Distribution by Income Level	30,543	21%	17%	22%	40%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,673	0%	16%	71%	13%	0%
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$30,290 = \$38,600 = 14.65%	Median Housing Value Unemployment Rate				= \$50,527 = 3.82%

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

Parkersburg is the central city of the Mid-Ohio Valley. Located on the western boarder of the state at the confluence of the Ohio and Little Kanawha Rivers, Parkersburg is home to the U.S. Bureau of Public Debt. Major employing industries include health services, retail, glass and other manufacturing, government, and education. Major employers include E.I. DuPont De Nemours & Company, Wood County Board of Education, Internal Revenue Service, Camden-Clarke Memorial Hospital, and Columbia Parkersburg Healthcare System.

UNB operates five branches and zero ATMs in the Parkersburg MSA. There is one AA for this MSA and the AA does not include the entire metropolitan area. UNB's AA includes all of Wood County, West Virginia and four census tracts in Washington County, Ohio (tracts 201.01, 201.02, 202.00 and 217.00). These four census tracts are adjacent to Wood County. Furthermore, the bank has made a significant number of loans in these areas. Approximately 20% of UNB's total deposits and 11% of its loans originated during the evaluation period are located in this AA. Major competitors in the AA include several community banks, a branch of a multinational bank and two offices of regional banking companies. UNB ranks first in deposits in Wood County, West Virginia with 38% market share.

UNB's primary business focus in this AA is residential real estate lending. The bank also engages in significant small business lending in this AA.

We reviewed prior community contact forms and the Consolidated HUD plan for the MSA. We also made two community contacts to determine the community credit and development needs of the AA. One organization was an economic development group and the other organization was an affordable housing group. Our contacts identified affordable housing loans directly through banks or nonprofit agencies as a credit need. The need for small and start up business loans was identified as a need. Also, consumer credit counseling for low- and moderate-income persons who do not know how to deal with banks or reestablish credit was identified as a need. Community development needs include infrastructure improvements, and developing adequate sites and building for industrial growth. Based on our contacts and review, available qualified investment opportunities are limited in this AA.

## Southern West Virginia Non MSA

Demographic Information for Full-Scope Area: Southern WV Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	48	0%	17%	73%	10%	0%
Population by Geography	220,448	0%	10%	81%	9%	0%
Owner-Occupied Housing by Geography	62,988	0%	10%	81%	9%	0%
Businesses by Geography	5,871	0%	12%	73%	15%	0%
Farms by Geography	83	0%	8%	83%	8%	0%
Family Distribution by Income Level	62,635	24%	17%	18%	41%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	25,670	0%	12%	81%	7%	0%
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$22,655 = \$28,200 = 22.65%	Median Housing Value Unemployment Rate				= \$42,702 = 5.72%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 199X HUD updated MFI.

The history of these southern West Virginia counties has been closely linked with coal mining. Although still a significant industry in the SWV AA, it has been experiencing a decline in recent years. These areas are distressed with high rates of unemployment and poverty level. Major employing industries include service producing, retail, coal and other manufacturing, and state and local government. UNB operates twelve branches and four ATMs in the SWV AA. This AA includes the following five non MSA counties in their entirety: Boone, Logan, Nicholas, Raleigh, and Fayette. Approximately 26% of UNB’s total deposits and 23% of its loans originated during the evaluation period are located in this AA.

Major competitors in the AA include several community banks, a branch of a multinational bank, and two offices of regional banking companies. UNB is ranked first in deposit market share in this AA with a 24% market share. UNB’s primary business focus in this AA is residential real estate lending. The bank also engages in significant small business lending in this AA.

We reviewed prior community contact forms and the Consolidated HUD plan for the state of West Virginia. We also made two community contacts to determine the community credit and development needs of the AA. Both organizations promote economic development in the AA. Identified community credit needs include: providing affordable single family housing for low and moderate income persons; programs serving first-time home buyers; rehabilitation of substandard housing; micro-loans for small businesses; and community/neighborhood revitalization. Based on our review and contacts, available qualified investment opportunities are limited.

## Appendix D: Tables of Performance Data

---

### Table of Contents

<b>Content of Standardized Tables</b> .....	D-2
<b>Tables of Performance Data</b>	
Wheeling, WV-OH MSA #9000 .....	D-5
State of West Virginia .....	D-12

## Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the **Abank** 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 included in each set:

**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 tracts 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 1. Lending Volume**

LENDING VOLUME		State: West Virginia - Ohio				Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans(#) in MSA/AA
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope:												
Wheeling, WV--OH #9000	100%	560	27,558	250	21,382	0	0	3	1,344	813	50,284	100%
Limited-Scope:												

\* Deposit data as of June 30, 1998.

**Table 2. Geographic Distribution of Home Purchase Loan Originations**

Geographic Distribution: HOME PURCHASE		State: West Virginia - Ohio				Evaluation Period: January 1, 1997 to December 31, 1998										
MSA/Assessment Area:	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**
Full-Scope:																
Wheeling, WV--OH #9000	< 1%	1%	6%	11%	74%	67%	20%	21%	3	9	33	12	11	6	181	100%
Limited-Scope:																

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

(\*\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

**Table 3. Geographic Distribution of Home Improvement Loan Originations**

Geographic Distribution: HOME IMPROVEMENT					State: West Virginia - Ohio				Evaluation Period: January 1, 1997 to December 31, 1998							
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**
Full-Scope:																
Wheeling, WV--OH # 9000	< 1%	1%	6%	10%	74%	80%	20%	9%	4	13	50	15	16	3	158	100%
Limited-Scope:																

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

(\*\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations**

Geographic Distribution: HOME MORTGAGE REFINANCE					State MSA: Wheeling, WV--OH				Evaluation Period: January 1, 1997 to December 31, 1998							
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	Mid	Upp	#	% of Total**
Full-Scope:																
Wheeling, WV--OH #9000	< 1%	0%	6%	5%	74%	71%	20%	24%	3	8	0	5	10	7	220	100%
Limited-Scope:																

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

(\*\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES																	State: West Virginia - Ohio		Evaluation Period: January 1, 1997 to December 31, 1998				
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**							
Full-Scope:																							
Wheeling, WV--OH #9000	2%	4%	25%	26%	50%	44%	23%	26%	4	9	26	13	8	7	250	100%							
Limited-Scope:																							

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

(\*\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

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

Geographic Distribution: SMALL LOANS TO FARMS																	State: West Virginia - Ohio		Evaluation Period: January 1, 1997 to December 31, 1998				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total 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**							
Full-Scope:																							
Wheeling, WV--OH #9000	0%	0%	2%	0%	84%	0%	14%	0%	0	0	N/A	0	0	0	0	0%							
Limited-Scope:																							

(\*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

(\*\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

**Table 7. Borrower Distribution of Home Purchase Loan Originations**

Borrower Distribution: HMDA HOME PURCHASE					State: West Virginia - Ohio				Evaluation Period: January 1, 1997 to December 31, 1998							
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**
Full-Scope:																
Wheeling, WV--OH #9000	20%	8%	18%	17%	22%	23%	40%	52%	3	9	4	16	8	9	181	100%
Limited-Scope:																

(\*) As a percentage of loans with borrower income information available. No information was available for 7% of loans originated by United NB.

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

(\*\*\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

**Table 8. Borrower Distribution of Home Improvement Loan Originations**

Borrower Distribution: HOME IMPROVEMENT					State: West Virginia - Ohio				Evaluation Period: January 1, 1997 to December 31, 1998							
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 Loan	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full-Scope:																
Wheeling, WV--OH #9000	20%	11%	18%	17%	22%	30%	40%	42%	4	13	10	11	14	16	158	100%
Limited-Scope:																

(\*) As a percentage of loans with borrower income information available. No information was available for 2% of loans originated by United NB.

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

(\*\*\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations**

Borrower Distribution: HOME MORTGAGE REFINANCE										State: West Virginia - Ohio			Evaluation Period: January 1, 1997 to December 31, 1998			
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 Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full-Scope:																
Wheeling, WV--OH #9000	20%	7%	18%	13%	22%	23%	40%	57%	3	8	6	9	7	10	220	100%
Limited-Scope:																

(\*) As a percentage of loans with borrower income information available. No information was available for 3% of loans originated by United NB.

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

(\*\*\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES										
				State: West Virginia - Ohio			Evaluation Period: January 1, 1997 to December 31, 1998			
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Loans to Businesses	
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total*****
Full-Scope:										
Wheeling, WV - OH #9000	69%	86%	75%	76%	16%	8%	6	6	250	100%
Limited-Scope:										

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

(\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7% of small loans to businesses originated and purchased by the bank.

(\*\*\*) The market consists of all other Small Business reporters in the MSA/AA and is based on 1998 Aggregate Small Business Data only.

(\*\*\*\*) Based on 1998 Aggregate Small Business Data only.

(\*\*\*\*\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

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

Borrower Distribution: SMALL LOANS TO FARMS State: West Virginia - Ohio Evaluation Period: January 1, 1997 to December 31, 1998										
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans	
	% of 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*****
Full-Scope:										
Wheeling, WV - OH #9000	99%	0%	80%	0%	0%	0%	0	0	0	0%
Limited-Scope:										

- (\*) Farms with revenues of \$1 million or less as a percentage of all farms.
- (\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0% of small loans to farms originated and purchased by the bank.
- (\*\*\*) The market consists of all other Small Farm reporters in the MSA/AA and is based on 1998 Aggregate Small Farm Data only.
- (\*\*\*\*) Based on 1998 Aggregate Small Farm Data only.
- (\*\*\*\*\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS State: West Virginia - Ohio Evaluation Period: January 1, 1997 to February 29, 2000										
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$=s	#	\$ (000's)	
Full-Scope:										
Wheeling, WV - OH	0	0	6	\$19	6	\$19	100%	0	0	
Limited-Scope:										

- (\*) **P**rior Period Investments@means investments made in a previous evaluation period that are outstanding as of the examination date.
- (\*\*) **U**nfunded Commitments@means legally binding investment commitments reported on the Report of Condition Schedule-L **A**Off Balance Sheet Items.@



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: West Virginia - Ohio				Evaluation Period: January 1, 1997 to February 29, 2000									
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Wheeling, WV - OH #9000	100%	10	100%	0%	40%	60%	0%	1	9	0	+2	+6	0	1%	8%	73%	18%
Limited-Scope:																	

**Table 1. Lending Volume**

LENDING VOLUME													State: West Virginia	Evaluation Period: January 1, 1997 to December 31 1998
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans (#) in MSA/AA		
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)			
Full-Scope:														
Charleston MSA #1480	20%	1,505	141,388	313	34,077	9	1,170	0	0	1,827	176,635	21%		
Parkersburg MSA #6020	20%	706	60,553	288	34,801	10	1,142	1	1,000	1,005	97,496	12%		
Southern WV Non MSA	26%	1,706	87,295	348	26,312	0	0	0	0	2,054	113,607	23%		
Limited-Scope:														
Huntington MSA #3400	9%	654	45,825	353	26,911	2	21	0	0	1,009	72,757	12%		
Steubenville MSA #8080	4%	240	9,460	140	8,487	0	0	1	180	381	18,127	4%		
Washington, DC MSA #8840	4%	20	1,664	12	1,267	0	0	1	1,500	33	4,431	< 1%		
Non MSA West Virginia	17%	1,762	90,440	655	35,215	33	1,104	4	4,224	2,454	130,983	28%		

**Table 2. Geographic Distribution of Home Purchase Loan Originations**

Geographic Distribution: HOME PURCHASE																
State: West Virginia																
Evaluation Period: January 1, 1997 to December 31 1998																
MSA/Assessment Area:	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**
Full-Scope:																
Charleston MSA #1480	< 1%	1%	17%	12%	58%	50%	25%	37%	3	7	12	5	7	7	665	25%
Parkersburg MSA #6020	N/A	N/A	11%	9%	70%	56%	19%	35%	2	13	N/A	10	14	14	345	13%
Southern WV Non MSA	N/A	N/A	10%	8%	81%	77%	9%	15%	2	14	N/A	14	14	19	673	25%
Limited-Scope:																
Huntington MSA #3400	< 1%	0%	16%	11%	60%	62%	24%	27%	11	3	0	3	2	4	234	9%
Steubenville MSA #8080	2%	0%	9%	16%	70%	47%	19%	37%	3	9	0	6	5	14	104	4%
Washington, DC MSA #8840	N/A	N/A	100%	100%	0%	0%	0%	0%	43	0	N/A	0	0	0	2	< 1%
Non MSA West Virginia	N/A	N/A	6%	11%	64%	56%	30%	33%	1	13	N/A	50	15	8	630	24%

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

(\*\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

**Table 3. Geographic Distribution of Home Improvement Loan Originations**

Geographic Distribution: HOME IMPROVEMENT																State: West Virginia		Evaluation Period: January 1, 1997 to December 31 1998	
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**			
Full-Scope:																			
Charleston MSA #1480	< 1%	0%	17%	23%	58%	51%	25%	26%	5	6	0	7	5	7	103	11%			
Parkersburg MSA #6020	N/A	N/A	11%	15%	70%	59%	19%	26%	6	7	N/A	8	6	10	27	3%			
Southern WV Non MSA	N/A	N/A	10%	12%	81%	81%	9%	7%	1	32	N/A	36	31	33	307	34%			
Limited-Scope:																			
Huntington MSA #3400	< 1%	0%	16%	8%	60%	72%	24%	20%	4	8	0	5	9	8	97	11%			
Steubenville MSA #8080	2%	0%	9%	6%	70%	72%	19%	22%	3	14	0	7	14	16	93	10%			
Washington, DC MSA #8840	N/A	N/A	100%	100%	0%	0%	0%	0%	4	7	N/A	7	0	0	11	1%			
Non MSA West Virginia	N/A	N/A	6%	35%	64%	59%	30%	6%	1	26	N/A	79	20	9	274	30%			

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

(\*\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations**

Geographic Distribution: HOME MORTGAGE REFINANCE																State: West Virginia		Evaluation Period: January 1, 1997 to December 31 1998	
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	Mid	Upp	#	% of Total**			
Full-Scope:																			
Charleston MSA #1480	< 1%	0%	17%	11%	58%	47%	25%	42%	3	7	0	8	6	7	737	24%			
Parkersburg MSA #6020	N/A	N/A	11%	7%	70%	57%	19%	36%	2	9	N/A	4	9	13	334	11%			
Southern WV Non MSA	N/A	N/A	10%	6%	81%	81%	9%	13%	1	16	N/A	7	17	13	726	24%			
Limited-Scope:																			
Huntington MSA #3400	< 1%	0%	16%	5%	60%	67%	24%	28%	7	4	0	2	5	4	322	11%			
Steubenville MSA #8080	2%	0%	9%	16%	70%	42%	19%	42%	12	2	0	2	2	3	43	1%			
Washington, DC MSA #8840	N/A	N/A	100%	100%	0%	0%	0%	0%	71	0	N/A	0	0	0	7	1%			
Non MSA West Virginia	N/A	N/A	6%	12%	64%	60%	30%	28%	1	17	N/A	59	17	12	857	28%			

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

(\*\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES																State: West Virginia		Evaluation Period: January 1, 1997 to December 31 1998	
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**			
Full-Scope:																			
Charleston MSA # 1480	13%	14%	19%	14%	45%	43%	23%	29%	8	6	7	8	7	5	313	15%			
Parkersburg MSA # 6020	N/A	N/A	28%	36%	59%	42%	13%	22%	6	7	N/A	7	9	3	288	14%			
Southern WV Non MSA	N/A	N/A	12%	11%	73%	63%	15%	26%	2	12	N/A	13	11	17	348	16%			
Limited-Scope:																			
Huntington MSA # 3400	16%	6%	13%	12%	48%	64%	23%	18%	2	14	6	11	16	16	353	17%			
Steubenville MSA # 8080	11%	2%	14%	21%	53%	34%	22%	43%	3	11	0	13	5	25	140	7%			
Washington, DC MSA # 8840	N/A	N/A	100%	100%	0%	0%	0%	0%	10	1	N/A	1	0	0	12	< 1%			
Non MSA West Virginia	N/A	N/A	2%	11%	65%	60%	33%	29%	1	20	N/A	56	23	12	655	31%			

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

(\*\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

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

Geographic Distribution: SMALL LOANS TO FARMS					State: West Virginia				Evaluation Period: January 1, 1997 to December 31 1998							
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total 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**
Full-Scope:																
Charleston MSA #1480	1%	44%	12%	33%	58%	12%	29%	11%	36	0	0	0	0	0	9	17%
Parkersburg MSA #6020	N/A	N/A	8%	20%	78%	60%	14%	20%	28	0	N/A	0	0	0	10	18%
Southern WV Non MSA	N/A	N/A	8%	0%	83%	0%	9%	0%	39	0	N/A	0	0	0	0	0%
Limited-Scope:																
Huntington MSA #3400	0%	0%	7%	0%	69%	50%	24%	0%	29	0	N/A	0	0	0	2	4%
Steubenville MSA #8080	2%	0%	10%	0%	81%	0%	7%	0%	29	0	0	0	0	0	0	0%
Washington, DC MSA #8840	N/A	N/A	100%	0%	0%	0%	0%	0%	14	0	N/A	0	0	0	0	0%
Non MSA West Virginia	N/A	N/A	0%	52%	70%	48%	30%	0%	1	54	N/A	87	35	0	33	61%

(\*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

(\*\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

**Table 7. Borrower Distribution of Home Purchase Loan Originations**

Borrower Distribution: HMDA HOME PURCHASE																
State: West Virginia							Evaluation Period: January 1, 1997 to December 31 1998									
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**
Full-Scope:																
Charleston MSA #1480	21%	8%	18%	20%	21%	26%	40%	46%	3	7	4	4	7	10	665	25%
Parkersburg MSA #6020	21%	7%	17%	17%	22%	22%	40%	54%	2	13	9	9	13	18	345	13%
Southern WV Non MSA	24%	20%	17%	30%	18%	27%	41%	23%	2	14	5	6	15	19	673	25%
Limited-Scope:																
Huntington MSA #3400	24%	11%	16%	26%	19%	27%	41%	36%	11	3	0	2	1	5	234	9%
Steubenville MSA #8080	20%	21%	18%	33%	22%	21%	40%	25%	3	9	10	9	10	8	104	4%
Washington, DC MSA #8840	35%	0%	30%	0%	21%	0%	14%	100%	43	0	0	0	0	3	2	< 1%
Non MSA West Virginia	20%	20%	15%	25%	19%	28%	46%	27%	1	13	17	13	12	16	630	24%

(\*) As a percentage of loans with borrower income information available. No information was available for 2% of loans originated by United NB.

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

(\*\*\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.



**Table 8. Borrower Distribution of Home Improvement Loan Originations**

Borrower Distribution: HOME IMPROVEMENT																
State: West Virginia																
Evaluation Period: January 1, 1997 to December 31 1998																
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 Loan	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full-Scope:																
Charleston MSA #1480	21%	22%	18%	31%	21%	23%	40%	24%	5	6	4	5	8	6	103	11%
Parkersburg MSA #6020	21%	19%	17%	18%	22%	26%	40%	37%	6	7	5	6	8	9	27	3%
Southern WV Non MSA	24%	33%	17%	35%	18%	20%	41%	12%	1	32	24	42	34	31	307	34%
Limited-Scope:																
Huntington MSA #3400	24%	26%	16%	28%	19%	27%	41%	19%	4	8	3	8	12	8	97	11%
Steubenville MSA #8080	20%	21%	18%	26%	22%	24%	40%	29%	3	14	14	12	8	18	93	10%
Washington, DC MSA #8840	35%	55%	30%	27%	21%	9%	14%	9%	4	7	9	8	3	0	11	1%
Non MSA West Virginia	20%	40%	15%	28%	19%	22%	46%	10%	1	26	31	24	31	23	274	30%

(\*) As a percentage of loans with borrower income information available. No information was available for 2% of loans originated by United NB.

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

(\*\*\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations**

Borrower Distribution: HOME MORTGAGE REFINANCE																
State: West Virginia					Evaluation Period: January 1, 1997 to December 31, 1998											
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 Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full-Scope:																
Charleston MSA #1480	21%	6%	18%	17%	21%	25%	40%	52%	3	7	5	4	7	8	737	24%
Parkersburg MSA #6020	21%	5%	17%	15%	22%	25%	40%	55%	2	9	4	9	9	11	334	11%
Southern WV Non MSA	24%	16%	17%	26%	18%	29%	41%	29%	1	16	8	13	14	21	726	24%
Limited-Scope:																
Huntington MSA #3400	24%	14%	16%	26%	19%	29%	41%	31%	7	4	0	3	4	6	322	11%
Steubenville MSA #8080	20%	12%	18%	14%	22%	21%	40%	53%	12	2	2	3	1	3	43	1%
Washington, DC MSA #8840	35%	43%	30%	29%	21%	14%	14%	14%	71	0	1	0	0	1	7	1%
Non MSA West Virginia	20%	20%	15%	27%	19%	25%	46%	28%	1	17	17	19	21	20	857	28%

(\*) As a percentage of loans with borrower income information available. No information was available for 2% of loans originated by United NB.

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

(\*\*\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES State: West Virginia Evaluation Period: January 1, 1997 to December 31, 1998										
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Loans To Businesses	
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total*****
Full-Scope:										
Charleston MSA # 1480	66%	81%	62%	72%	16%	12%	6	6	313	15%
Parkersburg MSA # 6020	69%	71%	59%	73%	13%	14%	7	8	288	14%
Southern WV NonMSA	68%	79%	59%	79%	17%	4%	12	19	348	16%
Limited-Scope:										
Huntington MSA #3400	69%	78%	63%	82%	11%	7%	14	19	353	17%
Steubenville MSA #8080	71%	84%	75%	84%	12%	4%	11	15	140	7%
Washington, DC MSA #8840	75%	100%	61%	55%	45%	0%	1	2	12	< 1%
Non MSA West Virginia	68%	91%	73%	88%	9%	3%	20	26	655	31%

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

(\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5% of small loans to businesses originated and purchased by the bank.

(\*\*\*) The market consists of all other Small Business reporters in the MSA/AA and is based on 1998 Aggregate Small Business Data only.

(\*\*\*\*) Based on 1998 Aggregate Small Business Data only.

(\*\*\*\*\* ) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

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

Borrower Distribution: SMALL LOANS TO FARMS State: West Virginia Evaluation Period: January 1, 1997 to December 31, 1998										
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans	
	% of 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*****
Full-Scope:										
Charleston MSA #1480	88%	67%	75%	38%	50%	12%	0	0	9	17%
Parkersburg MSA #6020	97%	56%	100%	67%	22%	11%	0	0	10	18%
Southern WV Non MSA	95%	0%	100%	0%	0%	0%	0	0	0	0%
Limited-Scope:										
Huntington MSA #3400	93%	100%	80%	100%	0%	0%	0	0	2	4%
Steubenville MSA #8080	98%	0%	67%	0%	0%	0%	0	0	0	0%
Washington, DC MSA #8840	98%	0%	100%	0%	0%	0%	0	0	0	0%
Non MSA West Virginia	97%	94%	100%	91%	6%	3%	54	54	33	61%

(\*) Farms with revenues of \$1 million or less as a percentage of all farms.

(\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 4% of small loans to farms originated and purchased by the bank.

(\*\*\*) The market consists of all other Small Farm reporters in the MSA/AA and is based on 1998 Aggregate Small Farm Data only.

(\*\*\*\*) Based on 1998 Aggregate Small Farm Data only.

(\*\*\*\*\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS									
			State: West Virginia		Evaluation Period: January 1, 1997 to February 29, 2000				
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$=	#	\$ (000's)
Full-Scope:									
Charleston MSA #1480	0	\$0	15	\$8,319	16	\$8,369	97%	0	\$0
Parkersburg MSA #6020	0	\$0	15	\$317	15	\$117	1%	0	\$0
Southern WV Non MSA	0	\$0	12	\$48	13	\$113	1%	0	\$0
Limited-Scope:									
Huntington MSA #3400	0	\$0	10	\$25	11	\$48	< 1%	0	\$0
Steubenville MSA #8080	0	\$0	3	\$5	4	\$15	< 1%	0	\$0
Washington, DC MSA #8840	0	\$0	0	\$0	1	\$10	< 1%	0	\$0
Non MSA West Virginia	0	\$0	8	\$6	9	\$48	< 1%	0	\$0

(\*) **P**rior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.

(\*\*) **U**nfunded Commitments means legally binding investment commitments reported on the Report of Condition Schedule-L **O**ff Balance Sheet Items.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: West Virginia				Evaluation Period: January 1, 1997 TO February 29, 2000									
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Charleston MSA #1480	20%	7	16%	43%	0%	43%	14%	0	0	0	0	0	0	1%	19%	58%	22%
Parkersburg MSA #6020	20%	5	11%	0%	40%	60%	0%	0	0	0	0	0	0	0%	12%	70%	18%
Southern WV Non MSA	26%	12	27%	0%	8%	92%	0%	0	0	0	0	0	0	0%	9%	82%	9%
Limited-Scope:																	
Huntington MSA #3400	9%	4	9%	0%	50%	50%	0%	0	0	0	0	0	0	3%	17%	57%	23%
Steubenville MSA #8080	4%	2	4%	0%	50%	0%	50%	2	0	0	0	-2	0	4%	9%	68%	19%
Washington, DC MSA #8840	4%	2	4%	0%	100%	0%	0%	0	2	0	+2	0	0	6%	19%	39%	36%
Non MSA West Virginia	17%	13	29%	0%	0%	92%	8%	0	3	0	0	+3	0	0%	5%	65%	30%