



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

June 03, 2002

# **Community Reinvestment Act Performance Evaluation**

**Peoples Bank, National Association  
Charter Number: 5552**

**138 Putnam Street  
Marietta, OH 45750**

**Office of the Comptroller of the Currency**

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**NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

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## Overall CRA Rating

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

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

Performance Levels	Peoples Bank, NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels reflect good responsiveness to assessment area (AA) credit needs.
- Geographic distribution of loans by income level of geography is good.
- Distribution of loans by income level of the borrower is good.
- Given the available opportunities within the bank's AA, the level of qualified investments is good.
- Delivery systems are accessible to all geographies and individuals of different income levels throughout its AAs.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. 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 with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental 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.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**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 area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

**Home Mortgage Loans:** such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. 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 Area (MA):** Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

Peoples Bank, N.A. (PBNA) is a wholly owned subsidiary of Peoples Bancorp, Inc., a publicly traded company (Nasdaq: PEBO) headquartered in Marietta, Ohio. As of March 31, 2002, PEBO had \$1.2 billion in total assets. The current institution was formed in March 2000, through the consolidation of the holding company's bank (The First National Bank of Southeastern Ohio) and thrift subsidiaries (The Peoples Banking and Trust Company, Russell Federal Savings Bank, and Catlettsburg Federal Savings Bank). The newly formed institution retains the original national bank charter #5552 previously assigned to The First National Bank of Southeastern Ohio.

PBNA is an interstate bank, with 38 branches and two loan production offices in Ohio, West Virginia, and Kentucky. PBNA has five AAs for CRA purposes. The bank operates in two multi-state MAs, the Parkersburg-Marietta MA in West Virginia and Ohio and the Huntington-Ashland MA in West Virginia and Kentucky. It also operates in the Columbus, Ohio MA and non-MA geographies in Ohio and West Virginia.

With the exception of minor changes, PBNA's AAs consist of the combined AAs from the individual institutions prior to consolidation.

PBNA offers a full range of banking products and services. As of March 31, 2002, PBNA had \$1.2 billion in assets. Loans represented 65 percent of total assets. The distribution of PBNA's loan portfolio was as follows: real estate loans (74 percent); commercial & industrial loans (11 percent); loans to individuals (14 percent); and the remaining (1 percent) was comprised of multiple other loan categories. The bank's real estate loan mix primarily consisted of 1-4 family residential (54 percent) and commercial (41 percent) loans. PBNA's Tier One Capital is \$95 million.

In determining the size and capacity of PBNA for CRA evaluation purposes, we considered operating subsidiaries and affiliates of the bank. During fourth quarter 2001, the holding company established three entities for investment and tax purposes. Two of these entities, Peoples Investment Company and Peoples Capital Corporation, are subsidiaries of the holding company. The third, PBNA, LLC, is a subsidiary of the bank. None of the bank's operating subsidiaries or affiliates contributes to or detracts from the CRA performance of the bank.

This is the first CRA evaluation for PBNA. Peoples Banking and Trust Company was rated "Satisfactory" at its last large bank CRA evaluation dated June 1, 1999. Russell Federal Savings Bank, The First National Bank of Southeastern Ohio, and Catlettsburg Federal Savings Bank each were also rated "Satisfactory" under small bank CRA evaluation procedures in 1996, 1997, and 1998, respectively.

There are no legal, financial or other factors that impede the bank's ability to help meet the credit needs in its AAs.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed its home mortgage loans and small loans to businesses. We did not evaluate small loans to farms since this is not a significant lending activity of PBNA. With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 2000 through December 31, 2001. This evaluation period reflects all data on home mortgage loans and small loans to businesses submitted to date by the consolidated institution (see Description of Institution).

Due to the unique circumstances of the consolidation, the evaluation periods for CD loans, qualified investments, and CD services were staggered to reflect the previous CRA evaluation dates of the merged institutions. Consideration was given only for CD loans, qualified investments, and CD services which were not considered under prior CRA performance evaluations or for which no other affiliate has received CRA consideration.

### Data Integrity

The Community Reinvestment Act requires that banks collect and maintain certain data regarding originations and purchases of home mortgage loans, small loans to businesses, and small loans to farms. This information is maintained in the bank's public file. As part of the CRA evaluation, we tested the bank's publicly filed data on home mortgage loans and small loans to businesses for accuracy. We also evaluated PBNA's processes to ensure that the data are reliable.

We determined the bank's data on small loans to businesses is reasonably accurate. However, an initial review of the data on home mortgage loans revealed significant errors relating to applicant income and geographic location of loans. Bank management was instructed to address these issues and file amended reports as appropriate. We conducted a subsequent review to evaluate the bank's actions to correct the data and found the data to be reliable. Therefore, this evaluation is based on accurate data.

CD loans, qualified investments, and CD services submitted by PBNA management were verified to ensure that they met the regulatory definition for community development. Some items submitted for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development. Therefore, this evaluation was based on CD loans, qualified investments, and CD services that met the regulatory definitions.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of AAs within that state was selected for full-scope reviews. Refer to the scope of evaluation under each State

Rating section for details regarding how the areas were selected. Every multistate MA in which the bank has branches in more than one state received a full-scope review.

## **Ratings**

The bank's overall rating is a blend of the multistate MA ratings and state ratings. Weighting of the rating areas was determined by examining the percentage of bank deposits and deposit market share, percentage of bank loans, and distribution of bank offices among the AAs.

The multi-state Parkersburg-Marietta MA rating area received the most weight since 47 percent of PBNA's deposits, 45 percent of the bank's loans, and 34 percent of the bank's offices are located in this rated area. A significant portion of the overall rating was also based on the bank's performance in the state of Ohio. Bank deposits, loans, and branches in these areas were 29 percent, 36 percent, and 39 percent, respectively. The state of West Virginia received moderate weight reflective of its deposit (16 percent) and lending (12 percent) presence in these areas. The multi-state Huntington-Ashland MA received the least weight since only 8 percent of PBNA's deposits and 7 percent of the bank's loans are located in these areas.

The multistate MA ratings and state ratings are based primarily on those areas that received full-scope reviews. Refer to the scope of evaluation under each State Rating section for details regarding how the areas were weighted in arriving at the overall state rating.

## **Fair Lending Review**

An analysis of the most recent public comments, consumer complaint information, and HMDA and small business lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in 1997 for The First National Bank of Southeastern Ohio.

## Multistate Metropolitan Area Rating

### Parkersburg-Marietta MA

**CRA rating for the Parkersburg-Marietta MA** <sup>1</sup>: Outstanding

**The lending test is rated:** High Satisfactory

**The investment test is rated:** Outstanding

**The service test is rated:** Outstanding

The major factors that support this rating include:

- Overall lending levels reflect a good responsiveness to meeting the credit needs of the AA.
- The geographic distribution of loans is adequate. The geographic distribution of home mortgage loans is adequate. The geographic distribution of small loans to businesses is adequate.
- The distribution of loans by income level of the borrower is good. The distribution of home mortgage loans by borrower income level is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is adequate.
- Community development lending is excellent and had a positive impact on the lending test conclusions.
- Given the available opportunities within the AA, the level of qualified investments is excellent.
- Delivery systems are readily accessible to all geographies and individuals of different income levels throughout the AA.

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<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 Parkersburg-Marietta MA**

Refer to the market profile for the Parkersburg-Marietta MA in Appendix C for detailed demographics and other performance context information.

### **LENDING TEST**

The bank's performance under the lending test in the Parkersburg-Marietta MA is rated High Satisfactory. Based on a full scope review, the bank's lending performance in the AA is good.

We placed more emphasis on home mortgage loans when evaluating product performance based on identified credit needs and the fact that PBNA originated more home mortgage loans than small loans to businesses. Based on volume, we placed more weight on home refinance loans (624). Home purchase loans (335) received moderate weight and home improvement loans (52) received the least weight. Because the number of the bank's multifamily loans is not significant enough to perform a meaningful analysis, we did not consider multifamily loans in evaluating the bank's geographic distribution of loans this AA.

### **Lending Activity**

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Areas" 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 of the AA. Relative to its deposit market rank, PBNA's home mortgage lending levels are excellent and its small business lending levels are good. Within the Parkersburg-Marietta MA, the bank ranks second in deposits (19 percent market share), first in home mortgages (19 percent market share) and fourth in small loans to businesses (10 percent market share). By home mortgage product, PBNA ranks second for each of home purchases (14 percent market share), home improvement (16 percent market share) and home refinance (17 percent market share) loans.

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

The overall geographic distribution of loans in the AA is adequate. The geographic distribution of home mortgage loans is adequate. The geographic distribution of small loans to businesses is adequate.

We considered the following factors in assessing the bank's lending performance in low- and moderate-income geographies. There are no low-income geographies within the AA. For home mortgage loans, our review focused on the bank's lending performance relative to the level of owner-occupied units in moderate-income geographies. The AA has 14 percent of its owner-occupied housing units located in moderate-income

geographies. For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses located within moderate-income geographies. The AA has 23 percent of its businesses located in moderate-income geographies.

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

Refer to Tables 2, 3, 4, and 5 in the "Multistate Metropolitan Areas " 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 geographic distribution of the bank's home purchase loans is good. PBNA's percentage of home purchase loans in moderate-income geographies is near to the percentage of owner-occupied housing units in moderate-income geographies. The bank's market share for home purchase loans in moderate-income geographies is somewhat below than its overall market share.

### **Home Improvement Loans**

The geographic distribution of the bank's home improvement loans is excellent. PBNA's percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied units in moderate-income geographies. The bank's market share for home improvement loans is near to its overall market share.

### **Home Refinance Loans**

The geographic distribution of the bank's home refinance loans is adequate. PBNA's percentage of home refinance loans in moderate-income geographies is somewhat below the percentage of owner-occupied housing units in moderate-income geographies. The bank's market share for home refinance loans in moderate-income geographies is somewhat below its overall market share.

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

Refer to Table 6 in the "Multistate Metropolitan Areas " 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 geographic distribution of the bank's small loans to businesses is adequate. PBNA's percentage of small loans to businesses is somewhat below the percentage of businesses located in moderate-income geographies. The bank's market share for small loans to businesses in moderate-income geographies is somewhat below than its overall market share.

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

PBNA's lending within this AA was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank's home mortgage loans and small loans to businesses. No unexplained or conspicuous gaps were identified.

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

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank's AAs, including two multistate MAs.

A substantial majority of bank's loan originations are within its AAs. Overall, 86 percent of PBNA's loan originations are within its AA. By loan product, 92 percent of home mortgage loans and 76 percent of small loans to businesses are inside the AA. Within the home mortgage loans, PBNA's originations of home purchase, home improvement and home refinance inside the bank's AA are 90 percent, 95 percent and 94 percent respectively. This performance was positively factored into the overall analysis of the bank's lending performance.

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

The overall distribution of loans by income level of borrower in the AA is good. The distribution of home mortgage loans by borrower income level is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is adequate.

We considered the following factors in assessing the bank's lending performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank's lending performance relative to the level of low- and moderate-income families within the AA. Twenty-one percent of the AA is listed as low-income and 18 percent are listed as moderate-income. Additionally, 15 percent of the households in the AA are below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage loan opportunities for low-income families in the AA are limited. This issue was factored into the analysis of home purchase and home refinance loans.

For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses with annual revenues of \$1 million or less. Eighty-seven percent of the businesses located in the AA have reported gross annual revenues of \$1 million or less. Information obtained from community contacts also indicated that business loans in amounts of \$25,000 or less was a credit need of the AA. As such, loan size was also considered in the analysis.

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

Refer to Tables 8, 9, and 10 in the “Multistate Metropolitan Areas ” 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 borrower distribution of the bank’s home purchase loans is excellent.

PBNA’s percentage of home purchase loans made to low-income borrowers is below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank’s market share for home purchase loans to low-income borrowers exceeds its overall market share. PBNA is also the overall leader, with a market rank of number one for home purchase loans to low-income borrowers in the AA.

PBNA’s percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank’s market share for home purchase loans to moderate-income borrowers is somewhat below its overall market share.

### **Home Improvement Loans**

The borrower distribution of the bank’s home improvement loans is excellent.

PBNA’s percentage of home improvement loans made to low-income borrowers exceeds the percentage of low-income families in the AA. The bank’s market share for home improvement loans to low-income borrowers significantly exceeds its overall market share.

PBNA’s percentage of home improvement loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank’s market share for home improvement loans to moderate-income borrowers exceeds its overall market share.

### **Home Refinance Loans**

The borrower distribution of the bank’s home refinance loans is excellent.

PBNA’s percentage of home refinance loans made to low-income borrowers is below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank’s market share for home refinance loans to low-income borrowers is somewhat below its overall market share. PBNA is also the overall leader, with a market rank of number one for home refinance loans to low-income borrowers in the AA.

PBNA's percentage of home refinance loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for home refinance loans to moderate-income borrowers exceeds its overall market share.

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

Refer to Table 11 in the "Multistate Metropolitan Areas" 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 borrower distribution of the bank's small loans to businesses is adequate. PBNA's percentage of small loans to businesses with revenues of \$1 million or less is somewhat below the percentage of businesses defined as such. However, the bank's market share of small loans to businesses with revenues of \$1 million or less is near to its overall market share. Further analysis of market share data revealed that, although PBNA is ranked eighth for small loans to businesses with revenues of \$1 million or less, institutions ranked between fourth and eighth are separated by a market share of no more than two percentage points. Additionally, a significant percentage of PBNA's small loans to businesses are for amounts of \$100,000 or less, which reflects the credit needs of the AA.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

PBNA's level of CD lending is excellent, based on the available opportunities within the bank's AA. Based on a pro-rata share of the bank's deposits for the AA, the level of CD lending represents approximately 25 percent of Tier One Capital. These loans had a positive impact on the lending performance in the AA.

Within the city of Marietta, PBNA made two loans totaling \$10 million to local manufacturing companies for plant and operations expansions. In both instances, the loans enabled these companies to expand their businesses and created additional low- and moderate-income positions for AA individuals. The bank also financed one loan for an affordable housing multifamily complex located within a moderate-income geography for low- and moderate-income individuals.

## **Product Innovation and Flexibility**

PBNA offers two flexible home mortgage products designed to assist low- and moderate-income borrowers obtain financing. Loans originated under these products were evaluated as home mortgage loans under the Lending Test. While both programs provide flexible terms and conditions, neither was considered innovative. The bank's flexible home mortgage products had a neutral impact on the lending performance of the AA.

PBNA offers a flexible home mortgage loan product targeted to low- and moderate-income individuals within its AA. The bank's Residential Assistance Program (RAP) includes flexible criteria, including 5 percent down payment, no minimum loan amounts, no points, no private mortgage insurance requirement, and higher qualifying debt ratios. Eligibility for the program is based on HUD's annual family income schedule. During the evaluation period, the bank originated 3 RAP loans within the AA totaling \$66 thousand. PBNA also originates home mortgage loans to the Community Action Group, which constructs new and rehabilitates existing single-family residences for low-income individuals. Community Action Group serves individuals and families in Washington County. During the evaluation period, the bank originated 13 home mortgage loans in coordination with the Community Action Group with the AA totaling \$1 million.

## **INVESTMENT TEST**

Refer to Table 14 in the "Multistate Metropolitan Areas " section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

PBNA's performance in the Parkersburg-Marietta MA is rated Outstanding under the investment test. Based on the full-scope review, the bank's performance is excellent.

Investments are primarily centered in donations and a prior period investment in affordable housing. Investments addressed social service and, to some degree, affordable housing needs. The bank committed to invest significant dollars into statewide low-income housing tax credit (LIHTC) projects. When drawing conclusions we considered the bank's level of capacity, dollar amount of investments, community development opportunities, and identified credit needs. We identified a moderate level of investment opportunities. Refer to the Market Profile for the Parkersburg-Marietta MA in Appendix C for needs and opportunities.

The opportunity to invest was primarily in charitable donations and grants. We did not identify any local low-income housing projects, or school or economic development bonds for low- and moderate-income individuals or agencies that serve low- and moderate-income individuals. Although, the bank participated in statewide LIHTC projects with the Ohio Capital Corporation, none of the LIHTC properties are located in the Parkersburg-Marietta MA. Portions of the LIHTC projects fund affordable housing within the Non-MA areas of Ohio included in the bank's AA. Given the proximity of the AAs and the regional benefit of these projects, we allocated the bank's investment in the

Ohio Capital Corporation based on its pro-rata share of PBNA deposits within Ohio. The bank's investments are not considered innovative or complex.

During the review period, the bank made 54 investments totaling \$ 2 million.

Investment activities included:

- Ohio Equity Fund Project IX – Allocated funds for this project for the AA was \$360 thousand. This Fund contains 20 properties with 939 affordable housing units. The allocated unfunded commitment is \$ 1.4 million.
- Ohio Equity Fund Project XI – This project has not yet been funded; units are under construction. This Fund contains 28 properties with 1,918 affordable housing units. The allocated unfunded commitment for this AA is \$ 1.8 million.
- Community Resources, Inc. - In December 2001, the bank invested \$100 thousand into the West Virginia Neighbor Investment Tax Credit Program. The recipient of the funds was Community Resources, a nonprofit community action agency located in Parkersburg, West Virginia that provides community and social services to low- and moderate-income individuals and families.
- Donations - The bank made 50 donations totaling \$ 38 thousand to local community organizations that provide community and social services to low- and moderate-income persons.

Prior period investments include one project with a current book value of \$ 1.4 million. This investment dates back to 1996, when the bank invested \$ 2.1 million into Marietta Mills, a limited partnership doing business as Marietta Mills Apartment. Fifty-six apartments were created through a LIHTC project. These units continue to have a positive impact on the community due to its newer construction and the limited building of affordable housing units, including apartments, in the AA.

## **SERVICE TEST**

The bank's performance under the service test in the Parkersburg-Marietta MA is rated Outstanding. Based on the full-scope review, the bank's performance in this AA is excellent. We placed the most weight on the distribution of the bank's branch delivery system in determining overall Service Test performance.

## **Retail Banking Services**

Refer to Table 15 in the "Multistate Metropolitan Areas " 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.

In the Parkersburg-Marietta MA, PBNA's delivery systems are readily accessible to all income-level geographies and individuals. The bank operates 13 full-service branches

in the AA. The percentage of the bank's branches in the moderate-income geographies closely approximates the percentage of the population residing in those geographies. The AA has no low-income geographies. In addition, the bank has 24-hour automated teller machines (ATMs) at eight of these locations. Of these, two (25 percent) are located in moderate-income geographies, four (50 percent) are located in middle-income geographies and two (25 percent) are located in upper-income geographies. Services do not vary in a way that inconveniences any portion of the AA. During the evaluation period, PBNA opened two branches in the Parkersburg–Marietta MA. Both branches are located within middle-income geographies within Wood County. These changes had a positive impact on the overall AA but a neutral impact on moderate-income geographies.

### **Community Development Services**

PBNA provides an adequate level of CD services. Primary services include providing financial expertise to a variety of community service and development organizations through board memberships, credit counseling, and the provision of technical financial assistance for CD organizations that serve low- and moderate-income consumers. Examples of primary CD services provided during the evaluation period in this AA are summarized below.

- PBNA's president serves as a co-chairman and member of the board of trustees of a foundation that provides leadership and grants to organizations for education, economic and community development, and charitable funding for programs such as food banks. The majority of agencies receiving grants from this foundation provide services to predominately low- and moderate-income individuals.
- A bank officer serves as a member of a scholarship fund that reviews applications and grants needs-based scholarships to college students in southern and southeastern Ohio. The scholarships are limited to low- and moderate-income students. For the 2002-2003 school year, nine scholarships were awarded.
- One bank officer serves as board member and another serves as treasurer of the local shelter for abused spouses and children providing services to primarily low- and moderate-income individuals.
- Another officer serves as treasurer and trustee and is a member of the executive committee of a local community improvement corporation (CIC) that has been dedicated to economic and community development in Washington County. Through the CIC's relationship with the Ohio State University Extension Office, the organization works on projects that benefit many low and moderate-income tracts throughout the county, and work to secure grants, etc. for those groups. Bank employees provide technical financial expertise by assisting with budget allocation and grant writing.

## Multistate Metropolitan Area Rating

### Huntington-Ashland MA

**CRA rating for the Huntington-Ashland MA <sup>2</sup>: Satisfactory**

**The lending test is rated: High Satisfactory**

**The investment test is rated: Low Satisfactory**

**The service test is rated: Outstanding**

The major factors that support this rating include:

- Overall lending levels reflect a good responsiveness to meeting the credit needs of the assessment area.
- The geographic distribution of home mortgage loans is good.
- The distribution of home mortgage loans by income level of the borrower is excellent.
- Given the available opportunities within the bank's assessment area, the level of qualified investments is adequate.
- Delivery systems are accessible to all geographies and individuals of different income levels throughout its AA.

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<sup>2</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 Huntington-Ashland MA**

Refer to the market profile for the Huntington-Ashland MA in Appendix C for detailed demographics and other performance context information.

### **LENDING TEST**

The bank's performance under the lending test in the Huntington-Ashland MA is rated High Satisfactory. Based on a full scope review, the bank's lending performance in the AA is good.

In evaluating the bank's lending test performance in this AA, we focused on home mortgage loans. Based on volume, we place more weight on home refinance loans (127) than on home purchase loans (74). Because the number of the bank's home improvement loans, multifamily loans, and small loans to businesses is not significant enough to perform a meaningful analysis, we did not consider those loans in evaluating the bank's geographic and borrower distribution of loans in this AA.

### **Lending Activity**

Refer to Tables 1 Lending Volume in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect a good responsiveness to meeting the credit needs of the AA. Relative to its deposit market rank, PBNA's home mortgage lending levels are excellent and its small business lending levels are adequate. Within the Huntington-Ashland MA, the bank ranks twenty-fifth in deposits (2 percent market share), twelfth in home mortgages (3 percent market share) and twenty-second in small loans to businesses (less than 1 percent market share). By home mortgage product, PBNA ranks twentieth (2 percent market share) for home purchase, twenty-second (1 percent market share) for home improvement, and ninth (4 percent market share) for home refinance loans.

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

The overall geographic distribution of home mortgage loans in the AA is good.

We considered the following factors in assessing the bank's lending performance in low- and moderate-income geographies. There are no low-income geographies with the AA. For home mortgage loans, our review focused on the bank's lending performance relative to the level of owner-occupied units in moderate-income geographies. The AA has 24 percent of its owner-occupied housing units located in moderate-income geographies.

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

Refer to Tables 2, 3, 4, and 5 in the “Multistate Metropolitan Areas” 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 geographic distribution of the bank’s home purchase loans is good. PBNA’s percentage of home purchase loans made in moderate-income geographies is somewhat below the percentage of owner-occupied housing units in moderate-income geographies. The bank’s market share for home purchase loans in moderate-income geographies exceeds its overall market share.

### **Home Refinance Loans**

The geographic distribution of the bank’s home refinance loans is good. PBNA’s percentage of home refinance loans made in moderate-income geographies is somewhat below the percentage of owner-occupied housing units in moderate-income geographies. The bank’s market share for home refinance loans in moderate-income geographies significantly exceeds its overall market share.

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

PBNA’s lending within this AA was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank’s home mortgage loans. No unexplained or conspicuous gaps were identified.

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

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank’s AAs, including two multistate MAs. Refer to analysis within the Parkersburg-Marietta MA section.

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

The overall distribution of home mortgage loans by income level of the borrower in the AA is excellent.

We considered the following factors in assessing the bank’s lending performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank’s lending performance relative to the level of low- and moderate-income families within the AA. Twenty-three percent of the AA is listed as low-income and 15

percent are listed as moderate-income. Additionally, 20percent of the households in the AA are below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage loan opportunities for low-income families in the AA are limited. This issue was factored into the analysis of home purchase and home refinance loans.

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

Refer to Tables 8, 9, and 10 in the “Multistate Metropolitan Areas” 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 borrower distribution of the bank’s home purchase loans is good.

PBNA’s percentage of home purchase loans made to low-income borrowers is below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank’s market share for home purchase loans to low-income borrowers is below than its overall market share.

PBNA’s percentage of home purchase loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. The bank’s market share for home purchase loans to moderate-income borrowers equals its overall market share.

### **Home Refinance Loans**

The borrower distribution of the bank’s home refinance loans is excellent.

PBNA’s percentage of home refinance loans made to low-income borrowers is below the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank’s market share for home refinance loans to low-income borrowers substantially meets its overall market share.

PBNA’s percentage of home refinance loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank’s market share for home refinance loans to moderate-income borrowers significantly exceeds its overall market share.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the “Multistate Metropolitan Area(s)” section of appendix D for the facts and data used to evaluate the bank’s level of community

development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

The bank did not originate any qualified community development loans in this AA during the evaluation period. This had a neutral impact on the lending performance in the AA.

### **Product Innovation and Flexibility**

PBNA does offer a flexible home mortgage loan product targeted to low- or moderate-income individuals within its AA. The bank's Residential Assistance Program (RAP) includes flexible criteria including 5% down payment, no minimum loan amounts, no points, no private mortgage insurance requirement and higher qualifying debt ratios. Eligibility for the program is based on HUD's annual family income schedule. During the evaluation period, the bank did not originate any RAP loans within the Huntington-Ashland AA. This had a neutral impact on the bank's lending performance in the AA.

### **INVESTMENT TEST**

Refer to Table 14 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

PBNA's performance under the Investment Test in the Huntington-Ashland MA is rated Low Satisfactory. Based on a full scope review, the bank's performance in the AA is adequate.

Investments met social service needs through donations to community organizations with community development purpose. In formulating our conclusions, we considered the bank's level of capacity, dollar amount of investments, community development opportunities, and identified credit needs. More weight was given to the bank's limited presence in this AA and the lack of qualified investment opportunities within the AA. We identified a limited level of investment opportunities. Refer to the Market Profile for Huntington-Ashland MSA in Appendix C for needs and opportunities. The opportunity to invest was primarily in charitable donations and grants. We did not identify any local low-income housing projects, school or economic development bonds for low-and moderate-income. The bank's investments are not innovative or complex.

During the review period, the bank made nine investments totaling \$1thousand. The donations were provided to community organizations that provide community and social services to low- and moderate-income persons.

## **SERVICE TEST**

The bank's performance under the Service Test in the Huntington-Ashland MA is rated Outstanding. Based on a full-scope review, the bank's performance in this AA is excellent. We placed the most weight on the distribution of the bank's branch delivery system in determining overall Service Test performance.

### **Retail Banking Services**

Refer to Table 15 in the "Multistate Metropolitan Areas" 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.

In the Ashland-Huntington MA, PBNA's delivery systems are readily accessible to essentially all portions of the AA. PBNA operates five full-service branches in the AA. The percentage of the bank's branches located in moderate-income geographies exceeds the percentage of the population residing in those geographies. There are no low-income geographies in the AA. Only one of the bank's locations, located in upper-income geography, has an ATM. PBNA did not open or close any branches in the AA during the evaluation period. Products and services do not vary among branches in a manner that inconveniences individuals or geographies

### **Community Development Services**

PBNA provides a limited level of CD services. A bank associate conducted financial classes for low-income individuals as a part of their education to obtain a job in conjunction with a local agency. A bank officer is a board member and provides financial expertise to the Catlettsburg Housing Authority (CHA), which provides housing to low- and moderate-income individuals and families.

## State Rating

### State of Ohio

<b>CRA Rating for Ohio<sup>3</sup>:</b>	<u>Satisfactory</u>
<b>The lending test is rated:</b>	<u>High Satisfactory</u>
<b>The investment test is rated:</b>	<u>Low Satisfactory</u>
<b>The service test is rated:</b>	<u>High Satisfactory</u>

The major factors that support this rating include:

- Overall lending levels reflect a good responsiveness to meeting the credit needs of the AA.
- The geographic distribution of loans is good. The geographic distribution of home mortgage loans is good. The geographic distribution of small loans to businesses is good.
- The distribution of loans by income level of the borrower is good. The distribution of home mortgage loans by borrower income level is good. The distribution of small loans to businesses with annual revenues of \$1 million or less is good.
- Flexible home mortgage products had a positive impact on the lending test conclusions.
- Given the available opportunities within the bank's assessment area, the level of qualified investments is adequate.
- Delivery systems are accessible to all geographies and individuals of different income levels throughout its AAs.

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<sup>3</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 institutions performance in that area.

## **Description of Institution's Operations in Ohio**

PBNA operates in the Columbus MA and six Non-MA counties within the state of Ohio. The majority of the bank's Ohio deposits, loans and branches are located within the Non-MA counties, which are contiguous to both the Parkersburg-Marietta MA and Huntington-Ashland MA.

Refer to the market profiles for the state of Ohio in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in Ohio**

PBNA's Non-MA of Ohio AA contains portions of six Ohio counties that are not located within a metropolitan statistical area. For the purposes of this evaluation, those geographies were combined into a single AA and received a full-scope review. These geographies represent PBNA's major markets in the state and account for 95 percent of the loans originated in Ohio.

The Columbus MA received a limited-scope review based on the limited presence the bank has in that AA. PBNA has only one branch within the MA and has delineated only four geographies as its AA.

The ratings for Ohio are based primarily on the results of the Non-MA of Ohio AA, which received a full-scope review. Loans, Investments and Services within the multi-state Parkersburg-Marietta MA were not considered in the evaluation for the state of Ohio.

## **LENDING TEST**

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

The bank's performance under the lending test in the state of Ohio is rated High Satisfactory. Based on the full-scope review, the bank's lending performance in the Non-MA of Ohio AA is good.

We placed more emphasis on home mortgage loans when evaluating product performance based on identified credit needs and the fact that PBNA originated more home mortgage loans than small loans to businesses. Based on volume we placed more weight on home refinance loans (473). Home purchase loans (305) received moderate weight and home improvement loans (61) received the least weight. Because the number of the bank's multifamily loans is not significant enough to perform a meaningful analysis, we did not consider multifamily loans in evaluating the bank's geographic distribution of loans in the AA.

## **Lending Activity**

Refer to Tables 1 Lending Volume in the state of Ohio 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 of the AA. Relative to its deposit market rank, PBNA's home mortgage lending levels are excellent and its small business lending levels are adequate. Within the AA, the bank ranks second in deposits (14 percent market share), first in home mortgages (11 percent market share) and fifth in small loans to businesses (8 percent market share). By home mortgage product, PBNA ranks first (10 percent market share) for home purchase, fourth (9 percent market share) for home improvement and second (10 percent market share) for home refinance loans.

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

The overall geographic distribution of loans in the Non-MA of Ohio AA is good. The geographic distribution for home mortgage loans is good and for small loans to businesses is good.

We considered the following factors in assessing the bank's lending performance in low- and moderate-income geographies. For home mortgage loans, our review focused on the bank's lending performance relative to the level of owner-occupied units in low- and moderate-income geographies. The AA has 1 percent of its owner-occupied housing units in low-income geographies and 51 percent in moderate-income geographies. For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses located within low- and moderate-income geographies. The AA has 7 percent of its businesses located in low-income geographies and 36 percent in moderate-income geographies.

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

Refer to Tables 2, 3, 4, and 5 in the state of Ohio 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 geographic distribution of the bank's home purchase loans in the Non-MA of Ohio AA is excellent. PBNA's percentage of home purchase loans made in low-income geographies exceeds the percentage of owner-occupied housing units within the same. The bank's market share for home purchase loans in low-income geographies exceeds its overall market share. PBNA's percentage of home purchase loans made in moderate-income geographies is equal to the percentage of owner-occupied housing

units within the same. The bank's market share for home purchase loans made in moderate-income geographies is equal to its overall market share.

### **Home Improvement Loans**

The geographic distribution of the bank's home improvement loans in the Non-MA of Ohio AA is excellent. PBNA's percentage of home improvement loans made in low-income geographies is lower than the percentage of owner-occupied housing units in those geographies. The bank's percentage of home improvement loans made in moderate-income geographies exceeds the percentage of owner-occupied housing units within the same. The bank's market share for home improvement loans in both low- and moderate-income geographies exceeds its overall market share.

### **Home Refinance Loans**

The geographic distribution of the bank's home refinance loans in the Non-MA of Ohio AA is good. PBNA's percentage of home refinance loans made in low-income geographies is lower than the percentage of owner-occupied housing units within the same. PBNA's percentage of home refinance loans made in moderate-income geographies is near to the percentage of owner-occupied housing units within the same. The bank's market share for home refinance loans in both low- and moderate-income geographies exceeds its overall market share.

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

Refer to Table 6 in the state of Ohio 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 geographic distribution of the bank's small loans to businesses in the Non-MA of Ohio is good. PBNA's percentage of small loans to businesses is lower than the percentage of businesses located within low-income geographies. PBNA's percentage of small loans to businesses is equal to the percentage of businesses located within moderate-income geographies. The bank's market share for small loans to businesses in both low- and moderate-income geographies exceeds its overall market share.

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

PBNA's lending within the state of Ohio was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank's home mortgage and small business loans. No unexplained or conspicuous gaps were identified.

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

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank's AAs, including two multistate MAs. Refer to analysis within the Parkersburg-Marietta MA section.

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

The overall distribution of loans by income level of borrower in the Non-MA of Ohio AA is good. The distribution of home mortgage loans by borrower income level is good. The distribution of small loans to businesses with annual revenues of \$1 million or less is good.

We considered the following factors in assessing the bank's performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank's lending performance relative to the level of low- and moderate-income borrowers within the AA. Twenty-eight percent of the AA is listed as low-income and 21 percent is listed as moderate-income. Additionally, 24 percent of the households in the AA are below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage opportunities for low-income families in the AA are limited. This issue was factored into the analysis of home purchase and home refinance loans.

For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses with annual revenues of \$1 million or less. Eighty-eight percent of the businesses located in the AA have reported gross annual revenues of \$1 million or less.

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

Refer to Tables 8, 9 and 10 in the state of Ohio 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 borrower distribution of the bank's home purchase loans in the Non-MA of Ohio AA is excellent.

PBNA's percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home purchase loans to low-income borrowers is near to its overall market share. PBNA is also the overall leader, with a market rank of number one, for home purchase loans to low-income borrowers in the AA.

PBNA's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to moderate-income borrowers is near to its overall market share.

### **Home Improvement Loans**

The borrower distribution of the bank's home improvement loans in the Non-MA of Ohio AA is good.

PBNA's percentage of home improvement loans to low-income borrowers is somewhat lower than the percentage of low-income families in the AA. PBNA's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home improvement loans to both low- and moderate-income families exceeds its overall market share.

### **Home Refinance Loans**

The borrower distribution of the bank's home refinance loans in the Non-MA of Ohio AA is good.

PBNA's percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home purchase loans to low-income borrowers is somewhat lower than its overall market share. PBNA is also a home mortgage leader in the AA, with a market rank of number two, for home refinance loans to low-income borrowers in the AA.

PBNA's percentage of home refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home refinance loans to moderate-income borrowers is somewhat lower than its overall market share.

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

Refer to Table 11 in the state of Ohio 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 borrower distribution of the bank's small loans to businesses in the Non-MA of Ohio AA is good. PBNA's percentage of loans to businesses with revenues of \$1 million or less was lower than the percentage of businesses defined as such. The bank's market share for loans to businesses with revenues of \$1 million or less exceeds its overall market share. Additionally, a significant percentage of PBNA's loans were for amounts of \$100,000 or less, which reflects the credit needs of the AA.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Ohio section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The bank did not originate any qualified community development loans in this AA during the evaluation period. This had a neutral impact on the lending performance in the state of Ohio.

## **Product Innovation and Flexibility**

PBNA offers two flexible home mortgage loan products designed to assist low- and moderate-income borrowers obtain financing. Loans originated under these products are evaluated as home mortgage loans under the Lending Test. While both programs provide flexible terms and conditions, neither is considered innovative. The bank's flexible home mortgage products had a positive impact on the lending performance of the AA.

The bank's Residential Assistance Program (RAP) includes flexible criteria including 5% down payment, no minimum loan amounts, no points, no private mortgage insurance requirement and higher qualifying debt ratios. Eligibility for the program is based on HUD's annual family income schedule. During the evaluation period, the bank originated 31 RAP loans within the AA totaling \$1.2 million. PBNA also originates home mortgage loans to the Community Action Group, which constructs new and rehabilitates existing single-family residences for low-income individuals. Community Action Group serves individuals and families in Morgan County. During the evaluation period, the bank originated eight home mortgage loans in coordination with the Community Action Group totaling \$690 thousand.

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

Based on the limited-scope review, the bank's performance under the lending test in the Columbus MA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Ohio. Refer to Tables 1-11 in the state of Ohio section of Appendix D for the facts and data used to evaluate the Columbus MA.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Ohio is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Non-MA of Ohio is adequate.

Refer to Table 14 in the state of Ohio section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Investments are primarily centered in donations and the bank committed significant dollars to a statewide low-income housing tax credit program. Investments addressed social service needs of low- and moderate-income individuals and limited affordable housing needs in the AA. In formulating our conclusions, we considered the bank's level of capacity, dollar amount of investments, community development opportunities, and identified credit needs. We identified a moderate level of investment opportunities. When drawing conclusions, we placed more weight on the dollar and volume of investments that were distributed to a number of active community organizations. Refer to the Market Profile for the Non-MA of Ohio AA in Appendix C for needs and opportunities. The opportunity to invest is primarily in charitable donations and grants. We did not identify any school or economic development bonds for low- and moderate-income individuals or agencies that serve low- and moderate-income individuals

During the evaluation period, PBNA committed to and began investing in two LIHTC projects through the Ohio Capital Corporation. One project in these statewide LIHTC projects is located in this AA (Meigs County). Given the proximity of the AAs and the regional benefit of these projects, we allocated the bank's investment in the Ohio Capital Corporation based on its pro-rata share of PBNA deposits within the AA. The bank's investments are not considered innovative or complex.

During the review period, the bank made 32 investments totaling \$234 thousand.

Investment activities included:

- Ohio Equity Funds Project IX – Allocated funding in this AA is \$228 thousand. This Fund contains 20 properties with 939 affordable housing units. The allocated unfunded commitment for this project is \$912 thousand.
- Ohio Equity Fund Project XI – This project has not yet been funded as units are under construction. This Fund contains 28 properties with 1,918 affordable housing units. Properties located within this AA include Colonial Park Property in Meigs County, Ohio that has 48 units of low- and moderate-income housing. The allocated unfunded commitment is \$ 1.1 million.
- Donations - During the review period, the bank made 30 donations totaling \$ 6 thousand to local community organizations that provide community and social services to low- and moderate-income individuals and families.

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

Based on the limited-scope review, the bank's performance under the investment test in the Columbus MA is not inconsistent with the State of Ohio's overall Low Satisfactory performance.

Refer to Table 14 in Appendix C 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 Ohio is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Non-MA of Ohio AA is good. We placed the most weight on the distribution of the bank's branch delivery system in determining overall Service Test performance.

### **Retail Banking Services**

Refer to Table 15 in the state of Ohio 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.

In the Non-MA of Ohio AA, PBNA's delivery systems are accessible to all portions of the AA. The bank operates 14 full-service branches in the AA. Delivery systems are readily accessible to low-income geographies, where the percentage of the bank's branches exceeds the percentage of the population residing in those geographies. Delivery systems are reasonably accessible to moderate-income geographies, where the percentage of the bank's branches is slightly lower than the percentage of the population residing in those geographies. The bank maintains eight 24-hour automated teller machines (ATMs) within the AA. Of these, three (38 percent) are located in low-income geographies, two (25 percent) are located in moderate-income geographies, one (12 percent) is located in a middle-income geography and two (25 percent) are located in upper-income geographies. Services do not vary in a way that inconveniences any portion of the AA. There were no openings or relocations of branches or closures during the evaluation period.

### **Community Development Services**

PBNA provides a limited level of CD services to the AA. A loan officer conducted presentations regarding the home mortgage application process to prospective borrowers in conjunction with a local housing agency that works with low- and moderate-income families to help them purchase affordable housing. The agency rehabilitates properties for resale to low- and moderate-income clients.

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

Based on the limited-scope review, the bank's performance under the service test in Columbus MA is not inconsistent with the bank's overall High Satisfactory performance under the service test in Ohio.

Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

## State Rating

### State of West Virginia

**CRA Rating for West Virginia<sup>4</sup>:** Satisfactory  
**The lending test is rated:** High Satisfactory  
**The investment test is rated:** Needs to Improve  
**The service test is rated:** Low Satisfactory

The major factors that support this rating include:

- Overall lending levels reflect an excellent responsiveness to meeting the credit needs of the AA.
- The distribution of loans by income level of the borrower is good. The distribution of home mortgage loans by borrower income level is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is adequate.
- Given the available opportunities within the bank's AA, the level of qualified investments is poor.
- Delivery systems are reasonably accessible to all geographies and individuals of different income levels throughout its AAs.

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<sup>4</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**

Refer to the market profile for the Non-MA of West Virginia in Appendix C for detailed demographics and other performance context information.

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

PBNA's AA contains portions of two West Virginia counties that are not located within a metropolitan statistical area. For the purposes of this evaluation, those geographies were combined into a single AA (Non MA of West Virginia AA) and received a full-scope review. These geographies represent PBNA's major markets in the state and account for 100 percent of the loans originated in West Virginia.

The ratings of West Virginia are based solely on the results of the Non MA of West Virginia AA. Loans, Investments and Services within the multi-state Parkersburg-Marietta MA and Huntington-Ashland MA were not considered in the evaluation for the state of West Virginia.

## **LENDING TEST**

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

The bank's performance under the lending test in the state of West Virginia is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Non-MA of West Virginia AA is good.

We placed more emphasis on home mortgage loans when evaluating product performance based on identified credit needs and the fact that PBNA originated more home mortgage loans than small loans to businesses. Based on volume, we placed the equal weight on home purchase (125) and home refinance (124) loans. Home improvement loans (41) received the least weight.

### **Lending Activity**

Refer to Tables 1 Lending Volume 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 reflect excellent responsiveness to meeting the credit needs of the AA. Relative to its deposit market rank, PBNA's home mortgage lending levels are excellent and its small business lending levels are good. Within the AA, the bank ranks first in deposits (27 percent market share), second in home mortgages (13 percent market share) and third in small loans to businesses (11 percent market share). By home mortgage product, PBNA ranks third (13 percent market share) in home

purchase, second (15 percent market share) in home improvement and first (14 percent market share) in home refinance loans.

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

There are no low- or moderate-income geographies within PBNA's Non-MA of West Virginia AA. As such, an analysis of the geographic distribution of loans would not be meaningful.

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

PBNA's lending within this AA was evaluated to determine if any unexplained or conspicuous gaps were identified regarding the geographic distribution of the bank's home mortgage and small business loans. No unexplained or conspicuous gaps were identified.

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

We performed the inside/outside ratio lending analysis at the bank level. We based this determination on the contiguous nature of the bank's AAs, including two multistate MAs. Refer to analysis within the Parkersburg-Marietta MA section.

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

The overall distribution of loans by income level of borrower in the Non-MA of West Virginia AA is good. The distribution of home mortgage loans by borrower income is excellent. The distribution of small loans to businesses with annual revenues of \$1 million or less is adequate.

We considered the following factors in assessing the bank's performance to low- and moderate-income borrowers. For home mortgage loans, our review focused on the bank's lending performance relative to the level of low- and moderate-income borrowers within the AA. Twenty-one percent of the AA is listed as low-income and 14 percent is listed as moderate-income. Additionally, 22 percent of the households in the AA are below the poverty level. Information obtained from local realtors and community organizations regarding the median and average sales price for single-family residences in the AA was used to determine the affordability of home mortgage loans for low-income borrowers. Based on this information, it was determined that home mortgage opportunities for low-income families in the AA are limited. This issue was factored into the analysis of home purchase and home refinance loans.

For small loans to businesses, our review focused on the bank's lending performance relative to the percentage of businesses with annual revenues of \$1 million or less. Eighty-eight percent of the businesses located in the AA have reported gross annual revenues of \$1 million or less.

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

Refer to Tables 8, 9 and 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 home mortgage loan originations and purchases.

### **Home Purchase Loans**

The borrower distribution of the bank's home purchase loans is excellent.

PBNA's percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home purchase loans to low-income borrowers exceeds its overall market share. PBNA is also the overall leader, with a market rank of number one, for home purchase loans to low-income borrowers.

PBNA's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to moderate-income borrowers is near to its overall market share.

### **Home Improvement Loans**

The borrower distribution of the bank's home improvement loans is excellent.

PBNA's percentage of home improvement loans to low-income borrowers exceeds the percentage of low-income families in the AA. The bank's market share for home improvement loans to low-income borrowers exceeds its overall market share.

PBNA's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home improvement loans to moderate-income borrowers exceeds its overall market share.

### **Home Refinance Loans**

The borrower distribution of the bank's home refinance loans is excellent.

PBNA's percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. Performance context issues outlined above mitigate this data. The bank's market share for home refinance loans to low-income borrowers is somewhat lower than its overall market share. Of the top six home refinance lenders to low-income borrowers in the AA, two tied for the lead market share and four tied for the second highest market share for the AA. PBNA is among the financial institutions tied for the second highest market share for home refinance loans to low-income borrowers.

PBNA's percentage of home refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for home refinance loans to moderate-income borrowers exceeds its overall market share.

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

Refer to Table 11 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 borrower distribution of the bank's small loans to businesses is adequate. PBNA's percentage of loans to businesses with revenues of \$1 million or less is lower than the percentage of businesses defined as such. The bank's market share of loans to businesses with revenues of \$1 million or less is near to its overall market share. Additionally, a significant percentage of PBNA's loan originations are for amounts of \$100,000 or less, which reflects the credit needs of the AA.

### **Community Development Lending**

Refer to Table 1 Lending Volume 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.

The bank did not originate any qualified community development loans in this AA during the evaluation period. This had a neutral impact on the lending performance in the AA.

### **Product Innovation and Flexibility**

PBNA does offer a flexible home mortgage loan product targeted to low- or moderate-income individuals within its AA. The bank's Residential Assistance Program (RAP) includes flexible criteria including 5% down payment, no minimum loan amounts, no points, no private mortgage insurance requirement and higher qualifying debt ratios. Eligibility for the program is based on HUD's annual family income schedule

During the evaluation period, the bank did not originate any RAP loans within the Non-MA West Virginia AA. This had a neutral impact on the lending performance of the bank.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in West Virginia is rated "Needs to Improve". Based on the full-scope review, the bank's performance in the Non-MA of West Virginia AA is poor.

Refer to Table 14 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.

PBNA's poor performance is a result of the low volume and dollar amount invested in relation to the bank's capacity, level of presence within the AA, identified opportunities and community needs. We identified a moderate level of investment opportunities. Refer to the Market Profile for the Non-MA of West Virginia AA in Appendix C.

The opportunity to invest was primarily in charitable donations and grants. We did not identify any LIHTC projects, school or economic development bonds for low- and moderate-income individuals or agencies that serve low- and moderate-income individuals. The bank's investments are not considered innovative or complex.

The bank made 12 investments totaling \$3 thousand. Investments were donations given to community development organizations that provide community and social services to low- and moderate-income individuals and families.

During the review period, PBNA invested a substantial amount of dollars in national LIHTC programs through Boston Financial Institutional Tax Credit and Lease Lend Tax Credit Programs. These programs are operating partnerships that own and operate low-income housing projects throughout the United States through the use of tax credits. These two programs benefit broader regional areas that include the bank's AA. However, due to the bank's poor performance in the AA, we could not consider these investments in the overall investment 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 the full-scope review, the bank's performance in the Non-MA of West Virginia AA is adequate.

### **Retail Banking Services**

Refer to Table 15 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.

PBNA's delivery systems are reasonably accessible to all portions of the AA. The bank operates five full-service branches in the AA. There are no low- or moderate-income geographies in the AA. Services do not vary in a way that inconveniences any portion of the AA. The bank maintains ATMs at all of its branch locations in the AA. There were no branch openings or relocations of branches or closures during the evaluation period.

## **Community Development Services**

PBNA provides a limited level of community development services in the AA. A bank associate conducted financial education seminars to prospective low-income borrowers in conjunction with a local housing authority that serves low- and moderate-income individuals and families.

## 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 non-metropolitan 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 (excludes CD loans): 01/01/2000 to 12/31/2001  Investment and Service Tests and CD Loans: 12/06/1997 to 06/01/2002	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Peoples Bank, N.A. (PBNA) Marietta, Ohio		Home Mortgage Loans Small Loans to Businesses Community Development Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Parkersburg-Marietta MA	Full-Scope	County of Washington, OH County of Wood, WV
Huntington-Ashland MA	Full-Scope	Counties of Boyd, Carter, Greenup, KY AA includes 1 geography in Cabell County, WV
Non-MA of Ohio	Full-Scope	Counties of Athens, Galia, Hocking, Meigs, Morgan, Noble, OH
Non-MA of West Virginia	Full-Scope	Counties of Mason and Wetzel, WV
Columbus MA	Limited-Scope	AA includes 4 geographies in Fairfield County, OH

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

RATINGS		BANK NAME		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Peoples Bank, N.A.	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Parkersburg-Marietta MA	High Satisfactory	Outstanding	Outstanding	Outstanding
Huntington-Ashland MA	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
State of Ohio	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
State of West Virginia	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory

(\*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

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

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**Parkersburg-Marietta MA**

Demographic Information for Full-Scope Area: Parkersburg-Marietta MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	45	0.00	20.00	60.00	20.00	0.00
Population by Geography	149,169	NA	15.93	67.23	16.83	0.00
Owner-Occupied Housing by Geography	42,816	NA	14.29	67.15	18.56	0.00
Businesses by Geography	5,684	NA	22.77	60.43	16.80	0.00
Farms by Geography	335	NA	13.13	80.60	6.27	0.00
Family Distribution by Income Level	42,736	20.90	17.69	22.40	39.01	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	16,489	NA	21.91	66.44	11.65	0.00
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below the Poverty Level	= \$30,476 = \$43,800 = 14.65%	Median Housing Value Unemployment Rate		= \$50,131 = 5.4%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2001 HUD updated MFI.

The AA consists of the entire Parkersburg-Marietta, WV-OH MA. The Parkersburg-Marietta MA is a multi-state MA, which includes Wood County in West Virginia and Washington County in Ohio. Wood County is located on the northwestern border of West Virginia along the Ohio River and is smaller than Washington County in total area. Vienna, Williamstown, and the county seat of Parkersburg are the county’s largest municipalities. In Washington County, Marietta is the county seat. Within the AA there are no low-income geographies, nine moderate-income geographies, 27 middle-income geographies, and nine upper-income geographies.

PBNA has 13 full service branches and eight ATMs in the AA, which conduct traditional banking services. The bank’s primary business focus in the AA is traditional retail banking.

PBNAs deposits in the Parkersburg Marietta MA total approximately \$388 million. Based on FDIC deposit market share data as of June 30, 2001, this represents 47 percent of the bank’s total deposits and equates to a 19 percent deposit market share that ranks PBNA as the second largest deposit taking institution in the MA. Competitors in the Parkersburg-Marietta MA include, but are not limited to, United National Bank, Bank One, N.A., Wesbanco, Branch Banking and Trust Company, and Marietta Savings.

Total bank loans in the AA equal \$112 million and represent 45 percent of total reported loans in the AA.

The unemployment rate for Washington County (Marietta) is 5.2 percent, as of April 2002, and is slightly below the Ohio state average of 5.4 percent. The unemployment rate for Wood County (Parkersburg) is 5.8 percent, as of April 2002, and is slightly below the West Virginia state average of 6.1 percent. Manufacturing, retail trade and services are the major industry trades in the MA.

The 2001 HUD adjusted median family income for the AA is \$43,800. Based on the 1990 census data, 21 percent of the families in the AA are low-income and 18 percent are moderate-income. The 1990 median housing value is \$50,131.

We identified the following credit and non-credit related needs in this AA.

- Affordable housing (i.e. single family rental, multifamily rental, homeownership, and rehabilitation) for low- and moderate-income individuals. Public and rental assisted housing and down payment assistance were also identified as needs.
- Small business working capital loans to existing and start up business in amounts of \$25,000 and less. Technical assistance to new and existing businesses was also identified as a need.
- Social services to low- and moderate-income families, including child care services, counseling and job training, credit and home ownership counseling, food donation, and health care services.

We determined these community needs by contacting representatives from local housing and community service agencies, and small business development organizations.

We determined that the opportunity to make CD loans and qualified investments, and to provide CD services within this AA is moderate. These opportunities include LIHTC projects, non-profit housing organizations, small business development centers, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities for partnerships are moderate. Competition for CD loans, qualified investments and CD services is moderate and consists primarily of several other financial institutions that have a presence within the AA.

**Huntington-Ashland MA**

Demographic Information for Full-Scope Area: Huntington-Ashland MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	0.00	39.29	39.29	21.43	0.00
Population by Geography	113,678	NA	25.38	50.17	24.45	0.00
Owner-Occupied Housing by Geography	32,658	NA	23.65	49.36	26.99	0.00
Businesses by Geography	3,989	NA	32.14	47.25	20.61	0.00
Farms by Geography	111	NA	22.52	57.66	19.82	0.00
Family Distribution by Income Level	32,849	23.48	15.43	18.49	42.61	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	12,789	NA	35.27	48.37	16.36	0.00
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below the Poverty Level	= \$27,934 = \$36,300 = 19.67%	Median Housing Value Unemployment Rate		= \$42,813 = 4.9% - 10.6%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2001HUD updated MFI.

The AA consists of the majority of the Huntington-Ashland, WV-KY, MA 3400. The Huntington-Ashland MA is a multi-state, which includes Cabell County in West Virginia and Boyd, Carter and Greenup Counties in Kentucky. The bank's AA includes one geography (0016.00) in Cabell County and all tracts in Boyd, Carter and Greenup Counties in Kentucky. Cabell County in West Virginia is located on the northwestern border of West Virginia along the Ohio River and contains the town of Huntington. Boyd and Greenup Counties in Kentucky are located in the Northeast corner of Kentucky and also border the Ohio River. Carter County is adjacent to both Boyd and Greenup Counties. The city of Ashland is located in Boyd County. Within the AA there are no low-income geographies, 11 moderate-income geographies, 11 middle-income geographies and six upper-income geographies.

PBNA has five full service branches and one ATM in the AA, which conduct traditional banking services. The bank's primary business focus in the AA is traditional retail banking.

PBNAs deposits in the Huntington-Ashland, WV-KY, MA total approximately \$65 million. Based on FDIC deposit market share data as of June 30, 2001, this represents 8 percent of the bank's total deposits and equates to a 2 percent deposit market share that ranks PBNA as 25<sup>th</sup> in deposit taking institution in the MA. Other competitors in the Huntington-Ashland WV-KY MA include, but are not limited to Bank One, NA, Huntington Federal Savings Bank, City National Bank, United National Bank, and Community Trust Bank, NA

Total bank loans in the AA equal \$12 million and represent 7 percent of total reported bank loans in the AA.

The unemployment rate for Cabell County (Huntington) is 4.9 percent, as of April 2002, and is below the West Virginia state average of 6.1 percent. The unemployment rate for Boyd is 5 percent, Greenup is 4.9 percent, and Carter County is 10.6 percent, as of April 2002. Boyd and Greenup Counties are slightly below the Kentucky state average of 5.1 percent, while Carter County is more than double the state average. In Huntington the major business industries are manufacturing and retail services. Federal, State and local governments are also considered major employers in the area. In Kentucky major industry is manufacturing.

The 2001 HUD adjusted median family income for the AA is \$36,300. Based on the 1990 census data, 23 percent of the families in the AA are low-income and 15 percent are moderate-income. Median Housing Value is \$42,813. Twenty-one percent of the households in the AA are below poverty level.

We identified the following credit and non-credit related needs in this AA.

- Affordable housing (i.e. single family homeownership, and rehabilitation) for low- and moderate-income individuals. Rental assisted housing and down payment assistance were also identified as needs.
- Small business working capital loans to existing and start up business in amounts of \$25,000 and less. Technical assistance to new and existing businesses was also identified as a need.
- Social services to low- and moderate-income families including child care services, counseling and job training, credit and home ownership counseling, food donation, health care services, and public transportation.
- There is also a great need for additional economic development of the area as one gets further away from the Ohio River. Revitalization of existing commercial areas and development of new areas is a necessity. Infrastructure improvements (roads, water, sewer, etc.) need to be completed in order to expand business areas.

We determined these community needs by contacting representatives from community service agencies and rural business development organizations.

We determined that the opportunity to make CD loans and qualified investments and to provide CD services within this AA is moderate. These opportunities include low-income housing tax credits, non-profit housing organizations, small business development centers, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities for partnerships are moderate. Competition for CD loans, qualified investments and CD services is moderate and consists primarily of several other financial institutions that have a presence within the MA.

**State of Ohio**

**Non-MA of Ohio AA**

Demographic Information for Full-Scope Area: Non-MA of Ohio AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	39	2.56	48.72	41.03	5.13	2.56
Population by Geography	157,392	8.31	46.16	41.06	4.77	0.00
Owner-Occupied Housing by Geography	39,959	0.57	50.41	44.77	4.25	0.00
Businesses by Geography	5,887	6.74	36.44	50.27	6.55	0.00
Farms by Geography	619	0.00	50.51	46.23	3.25	0.00
Family Distribution by Income Level	40,060	28.31	20.78	22.05	28.86	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	19,663	1.57	56.70	39.98	1.75	0.00
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below the Poverty Level	= \$25,127 = \$46,500 =23.58%	Median Housing Value Unemployment Rate		= \$43,315 = 4.1% - 13.6%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2001 HUD updated MFI.

The AA consists of Athens, Gallia, Hocking, Meigs, Morgan, and Noble Counties. Gallia and Meigs Counties border the Ohio River in the southeastern part of Ohio. Athens County is adjacent to Meigs County and is home to Ohio University. Morgan, Noble, and Athens Counties are all adjacent to Washington County, which is located in the Marietta-Parkersburg MA. Hocking County is adjacent to Athens County. Within the AA there is one low-income geography, 19 moderate-income geographies, 16 middle-income geographies and two upper-income geographies.

PBNA has 14 full service branches and eight ATMs in the AA, which conduct traditional banking services. Three of the branches are located in the low-income geographies.

PBNAs deposits in the Non-MA of Ohio total approximately \$227million. Based on FDIC deposit market share data as of June 30, 2001, this represents 27 percent of the banks total deposits and equates to a 14 percent deposit market share that ranks PBNA as the second largest deposit taking institution in the AA. Other competitors in the assessment area include, but are not limited to Ohio Valley Bank Company, Hocking Valley Bank, Bank One, NA, and Citizens Bank.

Total bank loans in the AA equal \$60 million and represent 35 percent of all total reported bank loans in the AA.

The unemployment rate for the counties are as follows: Athens 4.1 percent, Gallia 6.1 percent, Hocking 6 percent, Meigs 9.4 percent, Morgan 13.6 percent, and Noble 7.1 percent. All county rates range above the state average except for Athens County. The lower unemployment rate in Athens County is attributed to the employment opportunities at and around Ohio University. In Morgan and Meigs Counties the loss of several major industries in the last few years has increased unemployment. Ohio University is the largest employer in the area. Retail trade and services are the second and third largest employment industries in the area.

The 2001 HUD adjusted median family income for the AA is \$46,500. Based on the 1990 census data, 28 percent of the families in the AA are low-income and 21 percent are moderate-income. Median Housing Value is \$43,315. Twenty-four percent of the households in the AA are below poverty level.

We identified the following credit and non-credit related needs in this AA.

- Affordable housing (i.e. single family homeownership, and rehabilitation) for low- and moderate-income individuals. Rental assisted housing and down payment assistance were also identified as needs.
- Social services to low- and moderate-income families including child care services, credit and home ownership counseling, food donation, health care services, and public transportation.
- There is also a great need for additional economic development of the area as one gets further away from the Ohio River. Revitalization of existing commercial areas and development of new areas is a necessity. Infrastructure improvements (roads, water, sewer, etc.) need to be completed in order to expand business areas.
- Job services, education, training and retraining.

We determined these community needs by contacting representatives from local housing and community service agencies, and small business development organizations.

We determined that the opportunity to make CD loans and qualified investments and to provide CD services within this AA is moderate. These opportunities include low-income housing tax credits, non-profit housing organizations, small business development centers, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities for partnerships are moderate. Competition for CD loans, qualified investments and CD services is moderate and consists primarily of other financial institutions that have a presence within the AA.

**State of West Virginia**

**Non-MA of West Virginia AA**

Demographic Information for Full-Scope Area: Non-MA of West Virginia AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	8	NA	NA	87.50	12.50	0.00
Population by Geography	44,436	NA	NA	87.30	12.70	0.00
Owner-Occupied Housing by Geography	13,177	NA	NA	87.66	12.34	0.00
Businesses by Geography	1,233	NA	NA	79.32	20.68	NA
Farms by Geography	71	NA	NA	87.32	12.68	NA
Family Distribution by Income Level	12,679	21.44	14.21	17.62	46.73	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	4,520	NA	NA	87.39	12.61	NA
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below the Poverty Level	= \$26,040 = \$31,000 =22.03%	Median Housing Value Unemployment Rate		= \$46,759 = 7.7%/10.6%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2001HUD updated MFI.

The AA consists of Mason and Wetzel counties in West Virginia. Within the AA there are no low-income or moderate-income geographies. Wetzel County is located in the northwestern border of the state and Mason County is on the midwestern border of the state. Both counties border the Ohio River.

PBNA has five full service branches and five ATMs in the AA, which conduct traditional banking services. The bank’s primary business focus in the assessment area is traditional retail banking.

PBNAs deposits in the Non-MA of West Virginia AA total approximately \$131 million. Based on FDIC deposit market share data as of June 30, 2001, this represents 16 percent of the banks total deposits and equates to a 27 percent market share that ranks PBNA as the largest deposit taking institution in the AA. Other competitors in the assessment area include, but are not limited to Ohio Valley Bank Company, Wesbanco, City National Bank of West Virginia, and Branch Banking and Trust Company.

Total bank loans in the AA equal \$14 million and represent 12 percent of all total reported bank loans in the AA.

The unemployment rates for the counties are: Mason County 10.6 percent and Wetzel County 7.7 percent as of April 2002. Both county rates are above the West Virginia State average of 6.1 percent. The loss of several major industries, mining and manufacturing, in the last few years has increased unemployment. Service and retail trades are now considered the largest employer industry trades in the area.

The 2001 HUD adjusted median family income for the AA is \$31,000. Based on the 1990 census data, 21 percent of the families in the AA are low-income and 14 percent are moderate-income. Median Housing Value is \$42,702. Twenty-three percent of the households in the AA are below poverty level.

We identified the following credit and non-credit related needs in this AA.

- Affordable housing (i.e. single family homeownership, and rehabilitation) for low- and moderate-income individuals. Down payment assistance were also identified as needs.
- Social services to low- and moderate-income families including child care services, credit and home ownership counseling, food donation, health care services, and public transportation.

We determined these community needs by contacting representatives from rural development agencies, and small business development organizations.

We determined that the opportunity to make CD loans and qualified investments and to provide CD services within this AA is moderate. These opportunities include low-income housing tax credits, non-profit housing organizations, small business development centers, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities for partnerships are moderate. Competition for CD loans, qualified investments and CD services is moderate and consists primarily of other financial institutions that have a presence within the AA.

# Appendix D: Tables of Performance Data

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## Content of Standardized Tables

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A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases 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 MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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 MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- 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 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 Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income

geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6.** Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. 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 share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. 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. 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 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to

\$500,000) 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. 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 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)**

- For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

**Table 14. Qualified Investments**

- Presents the number and dollar amount of qualified investments made by the bank in each MA/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 be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

**Table 15. 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 MA/AA. The table also presents data on branch openings and closings in each MA/AA.

### Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
<b>Full Review:</b>												
Parkersburg-Marietta MA	85.98	1,103	68,910	317	31,547	4	204	3	11,470	1,337	112,131	85.67
Huntington-Ashland MA	14.02	208	10,947	10	980	0	0	0	0	218	11,927	14.23

\*Loan Data as of December 31, 2001. Rated Area refers to either the state or multistate MA rating area.

\*\*The evaluation period for Community Development Loans is December 6, 1997 to June 1, 2002.

\*\*\*Deposit Data as of June 30, 2001. Rated Area refers to either the state, multistate MA or institution, as appropriate.

### Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: January 01, 2000 TO December 31, 2001							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Parkersburg-Marietta MA	335	81.90	0.00	0.00	14.29	12.54	67.15	74.63	18.56	12.84	14.93	0.00	9.92	16.28	12.99
Huntington-Ashland MA	74	18.10	0.00	0.00	23.65	16.22	49.36	54.05	26.99	29.73	1.94	0.00	2.11	1.97	1.83

\*Based on 2000 Peer Mortgage Data: Central & North East Regions.

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

\*\*\*Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 1990 Census information.

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

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE METROPOLITAN AREAS										Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% 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	
<b>Full Review:</b>																
Parkersburg-Marietta MA	52	89.65	0.00	0.00	14.29	15.38	67.15	75.00	18.56	9.62	18.13	0.00	15.15	19.01	16.67	
Huntington-Ashland MA	6	10.35	0.00	0.00	23.65	0.00	49.36	50.00	26.99	50.00	0.79	0.00	0.00	0.49	1.54	

\*Based on 2000 Peer Mortgage Data: Central & North East Regions.

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

\*\*\*Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATE METROPOLITAN AREAS										Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% 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	
<b>Full Review:</b>																
Parkersburg-Marietta MA	624	83.09	0.00	0.00	14.29	11.22	67.15	74.20	18.56	14.58	22.39	0.00	14.18	23.80	25.00	
Huntington-Ashland MA	127	16.01	0.00	0.00	23.65	18.90	49.36	46.46	26.99	34.65	4.62	0.00	6.90	4.48	3.86	

\*Based on 2000 Peer Mortgage Data: Central & North East Regions.

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

\*\*\*Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

### Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MULTISTATE METROPOLITAN AREAS								Evaluation Period: January 01, 2000 TO December 31, 2001					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Parkersburg-Marietta MA	2	66.67	0.00	0.00	23.00	50.00	57.53	50.00	19.47	0.00	16.67	0.00	100.00	0.00	0.00
Huntington-Ashland MA	1	33.23	0.00	0.00	54.46	0.00	30.91	100.00	14.63	0.00	0.00	0.00	0.00	0.00	0.00

\*Based on 2000 Peer Mortgage Data: Central & North East Regions.

\*\*Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\*Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

### Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATE METROPOLITAN AREAS								Evaluation Period: January 01, 2000 TO December 31, 2001					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Parkersburg-Marietta MA	317	96.94	0.00	0.00	22.77	16.09	60.43	59.31	16.80	24.61	8.91	0.00	6.67	9.61	12.25
Huntington-Ashland MA	10	3.06	0.00	0.00	32.14	0.00	47.25	40.00	20.61	60.00	0.36	0.00	0.00	0.31	0.86

\*Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Source Data – Dun and Bradstreet 2002.

## Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: MULTISTATE METROPOLITAN AREAS				Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography									
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
<b>Full Review:</b>																				
Parkersburg-Marietta MA	4	100.00	0.00	0.00	13.13	25.00	80.60	75.00	6.27	0.00	7.14	0.00	0.00	8.33	0.00					
Huntington-Ashland MA	0	0.00	0.00	0.00	22.52	0.00	57.66	0.00	19.82	0.00	0.00	0.00	0.00	0.00	0.00					

\*Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Source Data – Dun and Bradstreet 2002

## Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE												Geography: MULTISTATE METROPOLITAN AREAS				Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share									
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp					
<b>Full Review:</b>																				
Parkersburg-Marietta MA	335	81.90	20.90	8.44	17.69	18.44	22.40	28.44	39.01	44.69	15.45	15.85	11.18	13.97	18.86					
Huntington-Ashland MA	74	18.10	23.48	6.76	15.43	13.51	18.49	36.49	42.61	43.24	2.50	0.78	2.51	2.80	2.65					

\*Based on 2000 Peer Mortgage Data: Central & North East Region.

\*\*As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the Bank.

\*\*\*Percentage of Families is based on the 1990 Census information.

## Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: January 01, 2000 TO December 31, 2001							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Parkersburg-Marietta MA	52	89.65	20.90	25.49	17.69	27.45	22.40	17.65	39.01	29.41	18.28	40.00	22.22	12.50	11.76
Huntington-Ashland MA	6	10.35	23.48	0.00	15.43	0.00	18.49	50.00	42.61	50.00	0.81	0.00	0.00	0.99	1.22

\*Based on 2000 Peer Mortgage Data: Central & North East Region.

\*\*As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the Bank.

\*\*\*Percentage of Families is based on the 1990 Census information.

## Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: January 01, 2000 TO December 31, 2001							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Parkersburg-Marietta MA	624	83.09	20.90	8.31	17.69	23.39	22.40	29.49	39.01	38.81	23.16	18.09	25.37	25.89	21.03
Huntington-Ashland MA	127	16.01	23.48	8.73	15.43	19.84	18.49	18.45	42.61	53.17	5.30	5.26	6.82	4.30	5.33

\*Based on 2000 Peer Mortgage Data: Central & North East Region.

\*\*As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the Bank.

\*\*\*Percentage of Families is based on the 1990 Census information.

## Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES      Geography: MULTISTATE METROPOLITAN AREAS      Evaluation Period: January 1, 2000 TO December 31, 2001									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Parkersburg-Marietta MA	317	96.94	86.65	48.26	71.92	18.30	9.78	8.91	7.61
Huntington-Ashland MA	10	3.06	86.04	10.00	50.00	50.00	0.00	0.36	0.00

\*Based on 2000 Peer Small Business Data: U.S.

\*\*Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B 2002).

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

## Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS      Geography: MULTISTATE METROPOLITAN AREAS      Evaluation Period: January 01, 2000 TO December 31, 2001									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Parkersburg-Marietta MA	4	100.00	97.61	50.00	75.00	25.00	0.00	7.14	0.00
Huntington-Ashland MA	0	0.00	91.89	0.00	0.00	0.00	0.00	0.00	0.00

\*Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B 2002).

### Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MULTISTATE METROPOLITAN AREAS				Evaluation Period: December 06, 1997 TO June 01, 2002					
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Parkersburg-Marietta MA	1	1,463	54	1,995	55	3,458	93.26	2	3,240
Huntington-Ashland MA	0	0	9	1	9	1	0.03	0	0

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

\*\*Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

### Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MULTISTATE METROPOLITAN AREAS																	
Evaluation Period: December 06, 1997 TO June 01, 2002																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Parkersburg-Marietta MA	85.98	13	34.21	0.00	15.38	69.23	15.38	2	0			+2		0.00	15.93	67.23	16.83
Huntington-Ashland MA	14.02	5	13.16	0.00	40.00	20.00	40.00	0	0					0.00	25.38	50.17	24.45

### Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO						Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
<b>Full Review:</b>												
Non-MA of Ohio	95.13	841	48,364	190	12,111	2	86	0	0	1,033	60,561	94.54
<b>Limited Review:</b>												
Columbus MA	4.87	38	4,308	15	2,180	0	0	0	0	53	64,88	5.46

\*Loan Data as of December 31, 2001. Rated area refers to either the state or multistate MA rating area.

\*\*The evaluation period for Community Development Loans is December 6, 1997 to June 1, 2002.

\*\*\*Deposit Data as of June 30, 2001. Rated Area refers to either the state, multistate MA or institution, as appropriate.

### Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OHIO						Evaluation Period: January 01, 2000 TO December 31, 2001							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of Ohio	305	93.84	0.57	2.30	50.41	49.51	44.77	44.59	4.25	3.61	10.99	23.08	10.84	11.18	7.37
<b>Limited Review:</b>															
Columbus MA	20	6.16	0.00	0.00	0.00	0.00	72.09	70.00	27.91	30.00	4.31	0.00	0.00	4.68	3.54

\*Based on 2000 Peer Mortgage Data: Central Region.

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

\*\*\*Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: January 01, 2000 TO December 31, 2001								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% 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
<b>Full Review:</b>															
Non-MA of Ohio	61	100.00	0.57	0.62	50.41	55.74	44.77	42.62	4.25	0.00	10.55	100.00	13.04	8.45	0.00
<b>Limited Review:</b>															
Columbus MA	0	0.00	0.00	0.00	0.00	0.00	72.09	0.00	27.91	0.00	0.00	0.00	0.00	0.00	0.00

\*Based on 2000 Peer Mortgage Data: Central Region.

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

\*\*\*Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: January 01, 2000 TO December 31, 2001								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% 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
<b>Full Review:</b>															
Non-MA of Ohio	473	96.33	0.57	1.27	50.41	46.93	44.77	48.84	4.25	2.96	11.71	27.27	11.85	10.56	18.52
<b>Limited Review:</b>															
Columbus MA	18	3.67	0.00	0.00	0.00	0.00	72.09	66.67	27.91	33.33	1.64	0.00	0.00	1.35	2.44

\*Based on 2000 Peer Mortgage Data: Central Region

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

\*\*\*Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

### Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: OHIO								Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of Ohio	0	0.00	30.35	0.00	23.26	100.00	36.35	0.00	10.04	0.00	50.00	0.00	100.00	0.00	0.00
<b>Limited Review:</b>															
Columbus MA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

\*Based on 2000 Peer Mortgage Data: Central Region.

\*\*Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\*Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

### Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO								Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of Ohio	190	92.68	6.74	4.21	36.44	36.32	50.27	53.68	6.55	5.79	7.96	10.91	9.93	7.03	9.86
<b>Limited Review:</b>															
Columbus MA	15	7.32	0.00	0.00	0.00	0.00	75.85	60.00	24.15	40.00	2.11	0.00	0.00	3.13	0.63

\* Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Source Data – Dun and Bradstreet 2002

### Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO						Evaluation Period: January 01, 2000 TO December 31, 2001						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of Ohio	2	100.00	0.00	0.00	50.51	0.00	46.23	100.00	3.25	0.00	1.69	0.00	0.00	3.13	0.00
<b>Limited Review:</b>															
Columbus MA	0	0.00	0.00	0.00	0.00	0.00	54.84	0.00	45.16	0.00	0.00	0.00	0.00	0.00	0.00

\*Based on 2000 Small Business Peer Data: U.S.

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

\*\*\*Source Data – Dun and Bradstreet 2002

### Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: OHIO						Evaluation Period: January 01, 2000 TO December 31, 2001						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of Ohio	305	93.84	28.31	13.29	20.78	27.91	22.05	25.58	28.86	33.22	12.36	12.11	11.70	11.81	13.53
<b>Limited Review:</b>															
Columbus MA	20	6.16	18.06	0.00	19.88	26.32	27.26	31.58	34.81	42.11	5.45	0.00	6.25	4.60	7.23

\*Based on 2000 Peer Mortgage Data: Central Region

\*\*As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased in the rated area.

\*\*\*Percentage of families is based on the 1990 Census information.

\*\*\*\*Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased by Bank.

### Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: OHIO						Evaluation Period: January 01, 2000 TO December 31, 2001						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of Ohio	61	100.00	28.31	22.96	20.78	27.87	22.05	31.15	28.86	18.03	10.81	16.00	11.65	10.48	8.04
<b>Limited Review:</b>															
Columbus MA	0	0.00	18.06	0.00	19.88	0.00	27.26	0.00	34.81	0.00	0.00	0.00	0.00	0.00	0.00

\*Based on 2000 Peer Mortgage Data: Central Region.

\*\*As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased in the rated area.

\*\*\*Percentage of families is based on the 1990 Census information.

\*\*\*\*Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased by Bank.

### Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO						Evaluation Period: January 01, 2000 TO December 31, 2001						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of Ohio	473	96.33	28.31	12.77	20.78	26.19	22.05	27.71	28.86	33.33	12.85	10.40	10.18	13.20	16.39
<b>Limited Review:</b>															
Columbus MA	18	3.67	18.06	23.53	19.88	17.65	27.26	35.29	34.81	23.53	1.84	0.00	0.00	4.88	1.32

\*Based on 2000 Peer Mortgage Data: Central Region.

\*\*As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased in the rated area.

\*\*\*Percentage of families is based on the 1990 Census information.

\*\*\*\*Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased by Bank.

### Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: OHIO			Evaluation Period: January 1, 2000 TO December 31, 2001	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Non-MA Ohio	190	92.68	87.66	55.26	86.84	7.37	5.79	7.96	9.21
<b>Limited Review:</b>									
Columbus MA	15	7.32	88.46	46.67	53.33	26.67	20.00	2.11	1.64

\*Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B 2002).

\*\*\*\*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 0% of small loans to businesses originated and purchased by the Bank.

### Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: OHIO			Evaluation Period: January 01, 2000 TO December 31, 2001	
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Non-MA Ohio	2	100.00	95.89	100.00	100.00	0.00	0.00	1.69	0.00
<b>Limited Review:</b>									
Columbus MA	0	0.00	95.70	0.00	0.00	0.00	0.00	0.00	0.00

\*Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B 2002).

\*\*\*\*Small loans to farms with revenues of \$1 million or less as a percentage of all loans to farms originated and purchased by the Bank.

### Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: December 06, 1997 TO June 01, 2002			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Non-MA Ohio	0	0	32	234	32	234	6.31	2	2,052
<b>Limited Review:</b>									
Columbus MA	0	0	1	12	1	12	0.32	0	0

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

\*\*Unfunded Commitment means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

### Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: OHIO							
Evaluation Period: December 06, 1997 TO June 01, 2002																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Non-MA Ohio	95.13	14	36.84	14.29	35.71	42.86	7.14	0	0					8.31	46.16	41.06	4.47
<b>Limited Review:</b>																	
Columbus MA	4.87	1	2.63	0.00	0.00	100.00	0.00	0	0					0.00	0.00	73.55	26.45

## Table 1. Lending Volume

LENDING VOLUME		Geography: WEST VIRGINIA						Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Non-MA of West Virginia	100.00	290	12,223	54	2,107	1	70	0	0	345	14,400	100.00

\*Loan Data as of December 31, 2001. Rated area refers to either the state or multistate MA rating area.

\*\*The evaluation period for Community Development Loans is December 6, 1997 to June 1, 2002.

\*\*\*Deposit Data as of June 30, 2001. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

## Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: WEST VIRGINIA						Evaluation Period: January 01, 2000 TO December 31, 2001							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of West Virginia	125	100.00	0.00	0.00	0.00	0.00	87.66	88.00	12.34	12.00	16.18	0.00	0.00	15.06	24.44

\*Based on 2000 Peer Mortgage Data: North East Regions.

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

\*\*\*Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME IMPROVEMENT			Geography: WEST VIRGINIA				Evaluation Period: January 01, 2000 TO December 31, 2001					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Non-MA of West Virginia	41	100.00	0.00	1.64	0.00	0.00	87.66	97.56	12.34	2.44	17.17	0.00	0.00	18.09	0.00	

Based on 2000 Peer Mortgage Data: North East Regions.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: WEST VIRGINIA				Evaluation Period: January 01, 2000 TO December 31, 2001					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Non-MA of West Virginia	124	100.00	0.00	1.27	0.00	0.00	87.66	91.13	12.34	8.87	15.03	0.00	0.00	14.60	18.75	

Based on 2000 Peer Mortgage Data: North East Regions.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

### Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: WEST VIRGINIA				Evaluation Period: January 01, 2000 TO December 31, 2001								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of West Virginia	2	100.00	0.00	0.00	0.00	0.00	69.28	0.00	30.72	0.00	0.00	0.00	0.00	0.00	0.00

\*Based on 2000 Peer Mortgage Data: North East Region.

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

\*\*\*Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information

### Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: WEST VIRGINIA				Evaluation Period: January 01, 2000 TO December 31, 2001								
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of West Virginia	54	100.00	0.00	0.00	0.00	0.00	79.32	98.15	20.68	1.85	10.60	0.00	0.00	12.59	2.22

\*Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Source Data – Dun and Bradstreet 2002

### Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: WEST VIRGINIA				Evaluation Period: January 01, 2000 TO December 31, 2001				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography									
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
<b>Full Review:</b>																				
Non-MA of West Virginia	1	100.00	0.00	0.00	0.00	0.00	87.32	100.00	12.68	0.00	0.00	0.00	0.00	0.00	0.00					

\*Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Source Data – Dun and Bradstreet 2002.

### Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE												Geography: WEST VIRGINIA				
Evaluation Period: January 01, 2000 TO December 31, 2001																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Non-MA of West Virginia	125	100.00	21.44	6.40	14.21	15.20	17.62	28.80	46.73	49.60	16.18	21.50	13.85	16.49	18.08	

\*Based on 2000 Peer Mortgage Data: North East Region

\*\*As a percentage of loans with borrower income information available. No information was available for 0% of the loans originated and purchased by the Bank.

\*\*\*Percentage of families is based on the 1990 Census information.

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

### Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: WEST VIRGINIA						Evaluation Period: January 01, 2000 TO December 31, 2001						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of West Virginia	41	100.00	21.44	26.83	14.21	21.95	17.62	19.51	46.73	31.71	17.17	62.50	19.05	10.71	12.50

\*Based on 2000 Peer Mortgage Data: North East Region.

\*\*As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.

\*\*\*Percentage of families is based on the 1990 Census information.

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

### Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: WEST VIRGINIA						Evaluation Period: January 01, 2000 TO December 31, 2001						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA of West Virginia	124	100.00	21.44	6.50	14.21	15.45	17.62	30.89	46.73	47.15	15.03	11.54	20.00	14.75	16.89

\*Based on 2000 Peer Mortgage Data: North East Region.

\*\*As a percentage of loans with borrower income information available. No information was available for 0% of the loans originated and purchased in the rated area.

\*\*\*Percentage of families is based on the 1990 Census information.

\*\*\*\*Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased by the bank.

### Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: WEST VIRGINIA		Evaluation Period: January 1, 2000 TO December 31, 2001			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Non-MA West Virginia	54	100.00	88.32	51.85	94.44	1.85	3.70	10.60	9.23

\*Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B 2002).

\*\*\*\*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 0% of small loans to businesses originated and purchased by the Bank.

### Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: WEST VIRGINIA		Evaluation Period: January 01, 2000 TO December 31, 2001			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Non-MA West Virginia	1	100.00	94.37	100.00	100.00	0.00	0.00	0.00	0.00

\*Based on 2000 Peer Small Business Data: U.S.

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

\*\*\*Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B 2002).

\*\*\*\*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.

### Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WEST VIRGINIA				Evaluation Period: December 06, 1997 TO June 01, 2002				
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
Non-MA West Virginia	0	0	12	3	12	3	0.08	0	0	

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

\*\*Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

### Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: WEST VIRGINIA									
Evaluation Period: December 06, 1997 TO June 01, 2002																	
MA/Assessment Area:	Deposits		Branches				Branch Openings/Closings				Population						
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Non-MA West Virginia	100.00	5	13.16	0.00	0.00	60.00	40.00	0	0					0.00	0.00	87.30	12.70

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