



PUBLIC DISCLOSURE

June 27, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Federal Savings & Loan Association of Ravenswood
Charter Number 703542**

712 Washington Street
Ravenswood, West Virginia 26164

Office of the Comptroller of the Currency

Roanoke Office
4419 Pheasant Ridge Road, Suite 300
Roanoke, Virginia 24014

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 lending test is rated **Satisfactory**.

The major factors that support this rating include:

- The Lending Test rating is based on the First Federal Savings and Loan Association of Ravenswood's (bank) performance in the Charleston, West Virginia (WV) MSA.
- The bank's average loan-to-deposit (LTD) ratio is more than reasonable based on the bank's size, capacity to lend, demographic and economic factors present in the assessment area (AA), and the lending opportunities in the AA.
- A majority of the bank's mortgage loans are originated inside the AA.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels in the AA.
- The bank has had no consumer complaints regarding its community reinvestment performance during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable.

The LTD ratio is calculated on a bank-wide basis, covering the quarters as of March 31, 2018 through January 31, 2022. The average quarterly LTD ratio for the bank for the 17 consecutive quarters is 92.44 percent. This is above the average quarterly LTD ratio of 82.16 percent for similar asset-sized institutions during the same time period. The bank's average quarterly LTD ratios ranged from a low of 79.40 percent, to a high of 111.71 percent. The bank's average quarterly LTD ratio compares favorably with other West Virginia institutions of similar asset size, which ranged from an average quarterly low of 62.64 percent, to a quarterly high of 106.95 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment area (AA).

The bank originated 85.88 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

The analysis in Table D shows the institution's lending inside and outside the AA. The distribution of loans inside the AA indicates that the institution is serving the credit needs of its AA.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				
	Inside		Outside			Inside		Outside		Total
	#	%	#	%		#	\$	%	\$	%
Home Mortgage Loans	73	85.88	12	14.12	85	7,520	84.40	1,390	15.60	8,910
Total	73	85.88	12	14.12	85	7,520	84.40	1,390	15.60	8,910

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

The bank is a federally chartered mutual savings bank headquartered in Ravenswood, Jackson County, West Virginia (WV). The bank was established January 1, 1934, and operates one full-service banking office, serving Jackson County in West Virginia. The main office is located in Ravenswood, WV in a middle-income census tract (CT). The bank has no branch offices and did not open or close any branch offices during the evaluation period. There were no merger or acquisition activities during the evaluation period. As of December 31, 2021, the bank had total assets of \$26.5 million, and Tier 1 Capital of \$2.4 million.

The bank's AA is comprised of Jackson County in West Virginia, which is part of the Charleston, WV MSA. The AA consists of six census tracts, of which there are five middle-income CTs and one upper-income CT. The bank has not made any changes to the AA since the previous evaluation. According to the 2015 American Community Survey (ACS) U.S. Census, the total population for AA was 29,256, and the distribution of families by income level was 18.9 percent low-income, 17.4 percent moderate-income, 14.7 percent middle-income, and 48.9 percent upper income.

The largest industries by employment in Jackson County, WV, are Trade, Transportation, and Utilities (1,432); Government (1,345); Education and Health Services (1,071); and Leisure and Hospitality (776). WorkForce WV, a division of the West Virginia Department of Commerce, reported that the top five employers in Jackson County were Constellium Rolled Products Ravenswood LLC, Jackson County Board of Education, Wal-Mart Stores, Inc., Henkels & McCoy, Inc., and WVU Medicine. Constellium is one of the largest rolled aluminum plants in the world, employer of 1,100, and a key supplier of aerospace, defense, transportation, marine, and industrial uses. Ravenswood, WV is located in the heart of the Jackson County Inland District Port Authority, the only working port authority in West Virginia. Ripley is second in population for Jackson County with 3,252 people according to the 2010 U.S. Census. Ripley, the county seat of government, is located along Mill Creek, approximately 12 miles south of Ravenswood, WV. Retail trade is the most common industry in Ripley with Wal-Mart Stores, Inc. being the largest employer in this type of industry.

The bank's hours of service are 8:00 a.m. to 4:00 p.m., Monday through Friday. The bank offers a drive-up window; but does not have an automated teller machine (ATM), or an internet website. Deposit services provided are passbook savings and certificates of deposit. Due to the small size and limited staff, the institution does not carry cash and therefore does not cash checks or offer checking accounts. The bank's primary focus is on mortgage lending. The bank offers conventional fixed rate loans for the purchase and refinance of one-to-four family and multi-family dwellings, as well as second deed of trust home equity loans and loans secured by unimproved land. The bank offers share loans secured by a savings account or

certificate of deposit. While home improvement loans are not offered, funds obtained from refinance and equity loans may be used for that purpose. The bank does not originate mortgage loans for sale on the secondary market, and retains all originated mortgage loans in its portfolio.

As of December 31, 2021, residential mortgages, including multi-family were approximately 90 percent. The table below represents the distribution of the bank's loan portfolio as of December 31, 2021.

Table 1: Distribution of Loan Portfolio*		
TYPE OF LOAN	Balance Outstanding (\$000s)	% OF TOTAL LOANS
1-4 Family Residential Real Estate	16,973	87.62
Non-Farm/Non-Residential Real Estate	1,576	8.13
Construction & Land Development	395	2.04
Multi-family Residential Real Estate	323	1.67
Loans to Individuals	105	0.54
Total	\$19,372	100.00%

*Source: Schedule RC-C Part 1 – Loans and Leases as reported in the Consolidated Report of Condition and Income as of December 31, 2021.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. The bank received a "Satisfactory" rating on its April 16, 2018 Community Reinvestment Act Performance Evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assessed the bank's lending performance in its AA under the CRA. We evaluated the bank using the Small Bank evaluation procedures, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs in its AA through its lending activities. We reviewed the bank's primary loan product, home mortgage loans, originated during the time period of January 1, 2019 through December 31, 2021, to evaluate performance under the lending test. The bank is not a HMDA-reporter, therefore, home mortgage information is considered in the performance context because the analysis for non-HMDA reporting banks is typically based on a sample of loans, rather than on total originations and purchases over the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings.

The state ratings are based on performance in all bank AAs. We placed equal weight on the bank's performance in each year of the evaluation to reach our conclusions. Refer to the "Scope" section under each state Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of West Virginia

CRA rating for the State of West Virginia¹: Satisfactory

The Lending Test is rated Satisfactory.

The major factors that support this rating include:

- The bank's lending activities reflect a reasonable distribution among borrowers of different income levels in the AA.

Description of Institution's Operations in West Virginia

The bank has one AA within the state of West Virginia rating area located within the Charleston, WV MSA. Please refer to the *Description of the Institution* section for additional details. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income (LMI) geographies. During the evaluation period, there were no CTs designated as low- or moderate-income CTs in the AA. Refer to Appendix A for a listing of the bank's AAs.

Competition for mortgage loans is strong and includes local commercial and savings banks, branches of larger regional and nationwide banks, and national mortgage lenders. Based on the most recent 2020 Peer Mortgage Data, there were 110 lending institutions within the AA competing for mortgage applications. The top four lenders, with combined market share of 30.73 percent by count and 29.00 percent by total dollar amount, are City National Bank of West Virginia, Victorian Finance, LLC, Quicken Loans, LLC, and Truist Bank.

A review of the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Market Share Report for Jackson County, West Virginia, indicated there are nine offices, representing six FDIC-insured institutions varying in asset size. The bank ranked sixth with a deposit market share of 4.57 percent. The top institutions and their respective deposit market share percentages were United Bank with 28.72 percent; City National Bank of West Virginia with 22.49 percent; Truist Bank with 19.16 percent; Premier Bank, Inc., with 13.11 percent; and Wesbanco Bank, Inc., with 11.95 percent.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate in the Jackson County, WV reported an annual average for years of 2019, 2020, and 2021 is 5.1, 8.5, and 5.7 percent respectively. The state of West Virginia unemployment rates were somewhat below Jackson County's unemployment rates, reporting an annual average for 2019, 2020, and 2021 is 4.9, 8.2, and 5.1 percent, respectfully. The national average annual unemployment rates of 3.9, 8.1, and 5.4 percent were comparable to the state and county rates for the same time period.

¹This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

At the peak of the COVID-19 pandemic in April 2020, the AA’s unemployment rate was 15.0 percent. While 2020 showed dramatic increases in unemployment rates, the rates steadily declined during 2020 and 2021, as businesses re-opened, and employees returned to work.

Housing

There are no low- or moderate-income census tracts in Jackson County. The 2015 ACS U.S. Census data reported single family homes make up most of the housing stock in Jackson County, with 77.38 percent of the homes consisting of one-unit, detached dwellings. Mobile homes account for 18.5 percent of the housing stock, and only 4.1 percent were multi-family housing. The median housing value in the Charleston, WV MSA was \$112,585, for the evaluation period and the median gross rent was \$563 per month.

Community Contact

As part of our evaluation, we reached out to several potential community contacts for an assessment of the local market area and the community development needs for low- and moderate-income families. We contacted a local organization for comment, but were unable to speak directly with a contact from this organization. Based upon our review of the State of West Virginia 2020-2024 Consolidated Plan (“The Plan”), we identified affordable housing and economic development as the primary needs. There are concerns related to the types of housing available. The Plan identified that the Housing Authority of the County of Jackson has improved coordination with public housing needs to increase and improve affordable housing opportunities. The Plan identified that housing needs include several census tracts in Jackson County in which over a third of renters are cost burdened. The top housing needs include lead paint remediation, heating system repairs, weatherization, and roof repairs.

Charleston, West Virginia MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charleston WV MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	0.0	83.3	16.7	0.0
Population by Geography	29,256	0.0	0.0	89.3	10.7	0.0
Housing Units by Geography	13,259	0.0	0.0	91.0	9.0	0.0
Owner-Occupied Units by Geography	8,668	0.0	0.0	89.7	10.3	0.0
Occupied Rental Units by Geography	2,450	0.0	0.0	92.2	7.8	0.0
Vacant Units by Geography	2,141	0.0	0.0	95.0	5.0	0.0
Businesses by Geography	1,831	0.0	0.0	88.7	11.3	0.0
Farms by Geography	87	0.0	0.0	83.9	16.1	0.0
Family Distribution by Income Level	7,669	18.9	17.4	14.7	48.9	0.0
Household Distribution by Income Level	11,118	20.8	16.4	16.9	45.9	0.0
Median Family Income MSA - 16620 Charleston, WV MSA		\$54,658	Median Housing Value			\$112,585
			Median Gross Rent			\$563
			Families Below Poverty Level			12.3%

Source: 2015 ACS and 2021 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in the state of West Virginia

We performed a full-scope review of the Charleston WV MSA AA. We placed equal weight on the bank's performance in each year of the evaluation to reach our conclusions.

Lending Test

The bank's performance under the Lending Test in the state of West Virginia is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charleston, WV MSA AA is reasonable.

Distribution of Loans by Income Level of the Geography

An analysis of the distribution of loans by income level of the geography is not meaningful because there are no low- or moderate-income geographies in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P 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.

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank. In reaching a conclusion, we weighted the low- and moderate-income (LMI) borrowers equally as the proportionate percentage of families live within these CTs.

The distribution of the bank's lending to low-income borrowers was below the percentage of low-income families and exceeds the aggregate lending to low-income families. The distribution of the bank's lending to moderate-income borrowers is somewhat below the percentage of moderate-income families and near to the level of aggregate lending to moderate-income families. The limited number of families and the strong lender competition in the AA makes it more difficult to lend to LMI families.

When assessing performance, examiners considered the affordability of housing for low- and moderate-income borrowers in the AA due to demographic constraints. The median housing value was \$112,585 per the 2015 ACS U.S. Census data. The weighted average median family income was \$54,658 for the AA, which means the maximum income for low-income families (defined as less than 50.00 percent of the area median family income) is \$27,329; and for moderate-income families (defined as greater than 50.00 percent and less than 80 percent of the area median family income) is \$43,726. Hence, the cost of housing is approximately 4.0 times low- and moderate-income family earnings. Therefore, low- and moderate-income borrowers may have difficulty qualifying for home mortgages. Additionally, approximately 12 percent of the households in the AA are below the poverty level. Peer banks display similar difficulties with lending to low-income families.

Responses to Complaints

The bank did not receive any complaints regarding its CRA performance during this evaluation period. This has a neutral impact on the overall CRA rating.

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 MSAs and non-MSAs 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.”

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NONE		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
West Virginia		
Charleston WV MSA	Full Scope	All census tracts in Jackson County, WV

Appendix B: Summary of State Ratings

RATINGS: First Federal Savings and Loan Association of Ravenswood	
Overall Bank:	Lending Test Rating
First Federal Savings and Loan Association of Ravenswood	Satisfactory
State:	
State of West Virginia	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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 householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope 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 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 conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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) 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.

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 1 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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, 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: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th 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 P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - 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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Charleston WV MSA #16620	73	7,520	100.0	701	18.9	9.59	3.6	17.4	12.33	14.8	14.7	23.29	23.0	48.9	54.79	42.8	0.0	0.0	15.8	
Total	73	7,520	100.0	701	18.9	9.59	3.6	17.4	12.33	14.8	14.7	23.29	23.0	48.9	54.79	42.8	0.0	0.0	15.8	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*