



Comptroller of the Currency
Administrator of National Banks

LARGE BANK

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**City National Bank of West Virginia
Charter Number: 14807
3601 MacCorkle Avenue, S. E.
Charleston, West Virginia 25304**

**Office of the Comptroller of the Currency
Southeastern District Office
Marquis One Tower, Suite 600
245 Peachtree Center Ave., NE
Atlanta, Georgia 30303-1223**

NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **City National Bank of West Virginia** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **July 12, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate - Any company that controls, is controlled by, or is under common control by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA) - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA) - The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

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

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**Satisfactory.**”

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

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

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

The major factors that support this rating include:

- < City originated a good percentage of loans within its assessment areas (AAs). In 1998, 99% of all HMDA loans and 86% of small business loans were originated within the AAs.
- < Geographic distribution of loans is adequate. Geographic distribution of HMDA lending and small business lending is adequate.
- < Lending to borrowers of different income and businesses of different sizes is adequate. HMDA lending is adequate. Small business lending is good.
- < City made an adequate level of qualified community development investments within its assessment areas based on the bank’s investment opportunities. Investments in a single Small Business Investment Corporation (SBIC) targeted all of its AAs and accounted for most of the dollars invested.
- < City’s delivery systems were reasonably accessible to geographies and individuals of different income levels in its assessment areas based on population demographics and branch and ATM locations.

Description of Institution

City National Bank of West Virginia (City) is headquartered in Charleston, West Virginia. City is wholly owned by City Holding Company. In April 1999, City Holding Company merged with Horizon Bancorp, Inc. This merger resulted in City Holding Company acquiring five additional West Virginia banks. As a result, City Holding Company's assets totaled \$2.5 billion as of June 30, 1999. This CRA analysis is not based upon the recently acquired Horizon Bancorp, Inc. In addition to City, City Holding Company owns Del Amo Savings Bank in Torrance, California and City Financial Corporation in Charleston, West Virginia. City is an interstate bank and operates 53 branches and 59 full service ATMs in its assessment areas. The AAs are primarily located in the state of West Virginia and include the Charleston West Virginia MSA #1480, the West Virginia portion of the Washington DC-VA-MD-WV MSA #8840, seven contiguous nonmetropolitan counties (Braxton, Fayette, Greenbrier, Nicholas, Raleigh, Summers, and Wyoming), three noncontiguous counties (Harrison, Jackson, and Mason) and one nonmetropolitan county in Ohio (Meigs). Also included in the bank's AA is the Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400.

Since our prior CRA evaluation, City merged nine affiliate banks owned by City Holding Company into City. In addition to merging the nine affiliate banks into City, certain non-bank operations owned by City Holding Company became divisions of City. These include City Mortgage Services, City Net, RMI, Ltd.(RMI), and Jarrett/Aim Communications. As of December 31, 1998, City had total assets of \$1.5 billion. City's loan portfolio totaled \$1.1 billion and Tier 1 Capital totaled \$186 million. The loan portfolio (in dollars) consisted of 60% residential real estate; 26% commercial, commercial real estate and construction loans; 13% consumer loans; and 1% other loans.

Community banking is the core business segment of City. City has provided a relatively broad range of consumer and small business banking products and services for years. Over the past several years, City has diversified its business to offer additional products and services to existing and new customers. These include mortgage banking, (origination, acquisitions, servicing and sale); investment advisory, insurance, and Internet technology products.

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

Community credit needs and opportunities are discussed in the respective Assessment Area Market Profiles in Appendix C.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The data used for all home mortgage (HMDA), small business, small farm, and community development loans covered the time period from January 1, 1998 to December 31, 1998. At the end of 1997, ten banks merged to form City. The majority of the banks which were merged were not HMDA reporters. As a result, we limited lending data to 1998 because of the multiple reporting entities and the inaccuracies of the reported data. We analyzed the bank's qualified investments and retail banking services from January 1, 1997 through July 12, 1999. City received a "Satisfactory" rating at the last CRA examination dated December 19, 1996.

Data Integrity

During April of 1998, OCC examiners verified the accuracy of the lending registers that the bank is required to file annually with regulators. The registers contain loan application data for home mortgage, small business, and small farm lending. We found excessive errors and required the bank to refile the data for each area. As part of this analysis, we sampled the refiled data and found it to be accurate. The data used in this analysis is reliable.

Selection of Areas for Full-Scope Review

In assessing City's performance under the CRA, we performed full scope reviews of the Charleston MSA #1480; Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400; the West Virginia portion of the Washington DC-MD-VA-WV MSA # 8840; seven contiguous nonmetropolitan counties in West Virginia; and Meigs County, Ohio. Because the bank had branches in WV only in MSA #8840, this multi-state MSA was treated as a regular MSA for analysis purposes. Areas selected for full scope reviews represented 78% of total bank deposits and 77% of loan activities during this evaluation period. Limited scope reviews were performed for the other four nonmetropolitan counties in West Virginia (Harrison, Jackson and Mason and Morgan).

Ratings

The overall bank rating was driven by the bank's performance in the state of West Virginia since the substantial majority of the bank's lending activities, deposits and branches were in these areas. The performance in the Multi-state MSA #3400 and the state of Ohio had little impact in arriving at the overall bank rating because the bank only recently entered the Ohio market and the bank's presence in multi-state MSA#3400 is small relative to its overall resources. The bank's loans and deposit volumes in multi-state MSA#3400 approximated 6% and 5%, respectively. Also, City did not have a physical presence in Ohio until November 1998. We assigned an overall bank rating, a Multi-state MSA #3400 rating, a state of West Virginia rating, and a rating for the state of Ohio. The bank's performance in the full scope areas is individually discussed later in this evaluation.

In the limited scope areas, we performed a sufficient analysis to determine if the bank's level of performance was consistent with the overall performance in the state. We placed more weight on the bank's HMDA and small business lending activities because these made up the majority of the bank's total lending during this evaluation period. More weight was given to home purchase and home improvement loans since affordable and decent housing was identified as a credit need within the bank's AA. Also, more consideration was given to community development loans which facilitate job creation and job retention because these were identified as needs within the bank's AA. Small farm lending is not a part of this analysis since it is not a major bank product and represented only 1% of the bank's total reported loans during the evaluation period.

Fair Lending Review

Our fair lending review focused on residential home purchase loans made in 1998. We compared black approved applicants to white approved applicants to determine whether loan rates, terms, and conditions were set without regard to the applicant's race. Based on this sample, no violations of the substantive provisions of the antidiscrimination laws and regulations were identified.

Multi-state Metropolitan Area Rating

CRA Rating for the Huntington, WV/Ashland, KY/Ironton, OH MSA #3400: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- < Lending activity is good and reflects responsiveness to credit needs. City is ranked tenth in the market for home purchase, third for home improvement, and sixteenth for small business lending. City is ranked ninth in deposits with a 5% market share.
- < Geographic distribution is good. Geographic distribution of HMDA lending is excellent. Geographic distribution of small business lending is adequate.
- < Lending to borrowers of different incomes and to businesses of different sizes is excellent. HMDA and small business lending is excellent.
- < City made an adequate level of qualified community development investments within its AA based upon its size and available opportunities. Almost all of the bank's qualified investment is related to an equity investment in an SBIC, which targets the larger region-wide area including the AA.
- < City's delivery systems are reasonably accessible to geographies and individuals of different income levels based on population demographics and branch and ATM locations. There have been no branch closings. Branch hours and services are tailored to meet the needs of the community.

Description of Institution's Operations in the Huntington, WV/Ashland, KY/Ironton, OH Multi-state MSA #3400

Refer to the Market Profile for the Huntington WV/Ashland, KY/Ironton, OH multi-state MSA #3400 in Appendix C for detailed demographics and other performance context information.

LENDING TEST

Lending Activity

Refer to Table 1 in the Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400 section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's lending activity is good and reflects responsiveness to credit needs. During this evaluation period, City generated 215 home mortgage loans (HMDA) totaling \$13 million. In addition, City originated 12 small business loans approximating \$2 million, and one community development loan totaling \$34,000. City ranked tenth in the market for home purchase, third for home improvement, and sixteenth for small business loans. Small business loans were given less weight in the rating due to the small number of loans in relation to home mortgage loans. Home purchase loans were given more weight than refinance loans due to home purchase loans being identified as a credit need. As of June 30, 1998, City's deposit rank in this AA was ninth. We did not identify any unexplained conspicuous gaps in the bank's lending activities.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in the Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400 section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

The overall geographic distribution of HMDA lending is excellent. Home purchase loans to low income areas exceed the percentage of owner occupied units. Low income market share is less than overall market share. Loans to moderate income areas exceed the percentage of owner occupied units. Moderate income market share exceeds overall market share.

Home improvement lending is not a significant product and was not evaluated.

Refinanced loans to low income areas exceed the percentage of owner occupied units. Low income market share is less than overall market share. Loans to moderate income areas exceed the percentage of owner occupied units. Moderate income market share exceeds overall market share.

Small Business Loans

Refer to Table 5 in the Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400 section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

The overall geographical distribution of small business lending is adequate. Loans to low income areas are less than the percentage of businesses in low income areas. Low income market share exceeds overall market share. Loans to moderate income areas are less than the percentage of businesses in moderate income geographies. Moderate income market share is less than overall market share. The volume of small business loans is very small and has little impact on the rating.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in the Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400 section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

The overall distribution of the bank's HMDA loans to low and moderate income borrowers is excellent. Home purchase loans to low income borrowers are less than the percentage of low income families. Low income market share exceeds overall market share. Loans to moderate income borrowers exceed the percentage of moderate income families. Moderate income market share meets overall market share.

Home improvement lending is not a significant product and was not evaluated.

The distribution of refinance loans is excellent. Refinanced loans to low income borrowers are less than the percentage of low income families. Low income market share exceeds overall market share. Loans to moderate income borrowers exceed the percentage of moderate income families. Moderate income market share exceeds overall market share.

Small Business Loans

Refer to Table 10 in the Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400 section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

City's lending to small businesses is excellent. Ninety-two percent of City's small business loans were to businesses with revenues of \$1 million or less. This exceeds the market, which made 59% of its loans to businesses with revenues of \$1 million or less. Market share for loans to small businesses exceeds overall market share. Fifty-eight percent of City's small business loans were in the amount of \$100,000 or less.

Community Development Lending

Refer to Table 1 in the Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400 section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending is adequate. City made one community development loan during this evaluation period totaling \$34,300 to a nonprofit community action agency which provides services to low income individuals and families in southwestern West Virginia. This organization provides the following community services to low or moderate income individuals -housing to homeless individuals, child care services, and nutrition centers for low income individuals.

Product Innovation and Flexibility

City's lending programs are not considered innovative or flexible.

INVESTMENT TEST

Refer to Table 12 in the Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400 section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

City made an adequate level of qualified investment within its AA based on the bank's deposit share and investment opportunities. Investment opportunities in West Virginia have been limited historically but are increasing. Efforts are underway by the bank, other financial institutions and various community development organizations to identify and address the needs within the AA.

The majority of investment credit comes from a \$2.6 million investment in a Small Business Investment Company (SBIC) which targets a four-state area that includes all of the bank's AAs. The AA does not receive benefit of the full investment. The amount is distributed across all of the bank's AAs. There are five partners in the SBIC and City is the only bank partner. The SBIC provides venture capital to new small and independent established businesses.

In addition, City made donations and grants to 10 different community development organizations totaling \$3,000. These were to community development organizations that provide community services to low and moderate income people.

SERVICE TEST

Retail Banking Services

Refer to Table 13 in the Huntington, WV/Ashland, KY/Ironton, OH multi-state MSA #3400 section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

Overall, City's performance under the Service Test is adequate. The distribution of the bank's branches and ATMs is reasonably accessible to geographies and individuals of different income levels based on the population demographics. There have been no branch closings during this evaluation period. Branch hours and services offered are tailored to meet the needs of the community.

Community Development Services

City provided a poor level of community development services during this evaluation period. City did not provide any community development services despite available opportunities and qualified bank personnel to provide such services.

State Rating

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

The major factors that support this rating include:

- < Lending levels are good based upon the bank's strategy and resources and demonstrate responsiveness to credit needs. City made 2,900 home mortgage loans totaling \$172 million and 814 small business loans totaling \$54 million.
- < Geographic distribution is adequate. HMDA lending is adequate. Small business lending is adequate.
- < Lending to borrowers of different income and to businesses of different sizes is good. HMDA lending is adequate. Small business lending is excellent.
- < City made an adequate level of qualified community development investments within its AAs based on its size and opportunities. Most of the bank's qualified investment is related to an equity investment in an SBIC which targets the larger region-wide area which includes the AAs but primarily benefits West Virginia.
- < City's delivery systems are reasonably accessible to different geographies and individuals of different income levels in its assessment areas based upon population demographics and the location of the banks branches and ATMs. There have been no branch closings. City opened two branches during this period, one in a low income area and the other in a middle income area. Branch hours and services are tailored to meet the needs of their community.

Description of Institution's Operations in West Virginia

City operates 41 branches and 49 full service ATMs within its AAs in the state. As of June 30, 1998, the bank had total deposits in the state approximating \$981 million. As of December 31, 1998, City ranked third in deposit share in the state of West Virginia.

City's assessment areas (AAs) evaluated as part of the state rating include all of Charleston WV MSA #1480, the West Virginia portion of the Washington DC-MD-VA-WV MSA #8840, and 11 nonmetropolitan counties in West Virginia. These eleven counties include Braxton, Fayette, Greenbrier, Harrison, Jackson, Mason, Morgan, Nicholas, Raleigh, Summers, and Wyoming. The bank's AAs in the state include 167 census tracts and 744 thousand persons. Of the tracts in the bank's assessment areas, 2% is low income, 24% is moderate income, 59% is middle income, 15% is upper income, and 1% is unclassified.

Competition in the bank's AAs is strong as there are numerous banks and other financial institutions. The major competitors are Bank One-West Virginia NA, United National Bank, One Valley Bank, and Community Trust Bank of West Virginia.

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

Scope of Evaluation in West Virginia

We performed full scope reviews of the Charleston WV MSA#1480; the West Virginia portion of the Washington DC-MD-VA-WV MSA #8840; and seven contiguous nonmetropolitan counties in West Virginia (Braxton, Fayette, Greenbrier, Nicholas, Raleigh, Summers and Wyoming). Limited-scope reviews were performed for four nonmetropolitan counties (Harrison, Jackson, Mason and Morgan). Areas selected for full scope reviews represented 78% of the bank's total deposits in West Virginia and 76% of the bank's loan activity during this evaluation period. The rating was primarily driven by the results of those areas that received full scope reviews. The Charleston WV MSA#1480 and seven contiguous nonmetropolitan counties' AAs were weighted more heavily in the full scope reviews due to the higher levels of lending and resources associated with those communities. Refer to the table in Appendix A for more information.

We placed more weight on the bank's HMDA and small business lending activities because these represented a majority of the bank's total lending during this evaluation period. More weight was given to home purchase and home improvement loans since affordable and decent housing was identified as a credit need with the bank's AA. Also, more consideration was given to community development lending which facilitates job creation and job retention because these were identified as needs within the AA. Small farm lending is not a major bank product and only made up 1% of the bank's total reported loans during this evaluation period and was not evaluated.

Community credit and community development needs were determined by contacting a local organization involved in affordable housing within the Charleston MSA# 1480. Affordable one-to-four family housing and decent housing were identified as the primary credit needs within the bank's assessment areas as was the need for job creation. We also reviewed records from a combination of prior community contacts performed by various regulatory agencies, and U.S. Department of Housing and Urban Development (HUD) Consolidated Plans for the Charleston MSA and Huntington Multi-state MSA. We determined that there are available community development investment opportunities within the bank's assessment areas, particularly in the Charleston MSA and the Appalachian Region (KY, TN, VA, WV). These opportunities include nonprofit housing organizations that promote affordable housing which need funds for operations. Also, there are opportunities for small business and small farm loans, investments, and services. Efforts are underway by local banks and community development organizations to address the needs in the AAs.

LENDING TEST

Conclusions for Areas Receiving Full Scope Reviews

The bank's performance under the Lending Test in West Virginia is rated "Low Satisfactory." Based on full-scope reviews, lending performance in the Charleston WV MSA #1480, the West Virginia portion of the Washington DC-MD-VA-WV MSA #8840, and the seven contiguous nonmetropolitan areas is adequate in each.

Lending Activity

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

City's performance in meeting the credit needs within its communities in West Virginia is adequate. City made 2,900 HMDA loans totaling \$173 million. This represents 92% of the total bank HMDA lending in 1998. City made 814 small business loans totaling \$54 million or 95% of the bank's total small business lending. City's pro-rata share of community development loans extended by a CDC (West Virginia Capital Corporation) in which City invested totaled \$1.2 million. City's deposit rank was third in the state of West Virginia as of December 31, 1998. Also, as of June 30, 1998, approximately 95% of City's total deposits were in its West Virginia AAs. City ranked second in the market for home mortgage loans and third for small business loans in the Charleston MSA. In the Washington DC-MD-VA-WV MSA, City ranked sixth in home mortgage loans and ninth in small business loans. Additionally, City ranked first in the market for home mortgage and small business loans in the seven nonmetropolitan counties. There were no unexplained conspicuous gaps in the bank's lending activities.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of the bank's HMDA lending in West Virginia is adequate. Analysis of the Washington DC-MD-VA-WV MSA #8840 would not be meaningful since all census tracts are moderate income.

The overall distribution of home purchase loans is adequate. The distribution of home purchase loans in the Charleston WV MSA #1480 is adequate. In low income areas the penetration exceeds the nominal percentage of owner occupied housing. Low income market share is less than overall market share. In moderate income areas the penetration is less than the percentage of owner occupied housing. Moderate income market share meets overall market share. The distribution of home purchase loans in the seven contiguous nonmetropolitan counties area is adequate. There are no low income geographies. Loans in moderate income areas are less than the percentage of owner occupied units. Moderate income market share is less than overall market share.

The overall distribution of home improvement loans is adequate. The distribution of home improvement loans in the Charleston WV MSA #1480 is adequate. Loans to low income areas are less than the nominal percentage of owner occupied units. Loans to moderate income areas meet the percentage of owner occupied units. Moderate income market share is less than overall market share. The distribution of home improvement loans in the seven contiguous nonmetropolitan counties area is adequate. There are no low income geographies. Loans in moderate income areas are less than the percentage of owner occupied units. Moderate income market share is less than overall market share.

The overall distribution of home refinance loans is adequate. The distribution of the bank's home refinance loans in the Charleston WV MSA #1480 is adequate. Loans to low income areas are less than the nominal percentage of owner occupied units. Loans to moderate income areas are less than the percentage of owner occupied units. Moderate income market share meets overall market share. The distribution of home refinance loans in the seven contiguous nonmetropolitan counties is adequate. There are no low income geographies. Loans in moderate income areas meet the percentage of owner occupied units. Moderate income market share is less than overall market share.

Small Business Loans

Refer to Table 5 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

The overall distribution of the bank's small business loans is adequate. The distribution of small business loans in the Charleston WV MSA #1480 is adequate. Loans to low income areas are less than the percentage of businesses. Low income market share is less than overall market share. Loans to moderate income areas are less than the percentage of businesses. Moderate income market share is less than overall market share. The distribution of small business loans in the seven contiguous nonmetropolitan counties area is adequate. There are no low income geographies. Small business loans in moderate income areas meet the percentage of businesses. Moderate income market share is less than overall market share.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

The overall distribution of the bank's HMDA lending by borrower income in West Virginia is adequate. The distribution of the bank's home mortgage loans by income level in the Charleston WV MSA #1480 is good. Loans to low income borrowers are less than the percentage of low income families. Low income market share meets the overall market share. Loans to moderate income borrowers meet the percentage of moderate income families. Moderate income market share exceeds overall market share. The distribution of home purchase loans in the seven contiguous nonmetropolitan counties area is adequate. Loans to low income borrowers are less than the percentage of low income families. Low income market share is less than overall market share. Loans to moderate income borrowers meet the percentage of moderate income families. Moderate income market share is less than overall market share. The distribution of home purchase loans in the Washington DC-MD-VA-WV MSA#8840 is good. Loans to low income borrowers meet the percentage of low income families. Low income market share exceeds overall market share. Loans to moderate income borrowers are less than the percentage of moderate income families. Moderate income market share meets the overall market share.

The overall distribution of home improvement loans is adequate. The distribution of the bank's home improvement loans in the Charleston WV MSA #1480 is adequate. Loans to low income borrowers are less than the percentage of low income families. Low income market share is less than overall market share. Loans to moderate income borrowers exceed the percentage of moderate income families. Moderate income market share is less than overall market share. The distribution of home improvement loans in the seven contiguous nonmetropolitan counties area is adequate. Loans to low income borrowers are less than the percentage of low income families. Low income market share is less than overall market share. Loans to moderate income borrowers exceed the percentage of moderate income families. Moderate income market share is less than overall market share. The distribution of home improvement loans in the Washington DC-MD-VA-WV MSA#8840 is adequate. Loans to low income borrowers exceed the percentage of low income families. Low income market share meets the overall market share. Loans to moderate income borrowers are less than the percentage of moderate income families. Moderate income market share is less than overall market share.

The overall distribution of home refinance loans is adequate. The distribution of the bank's home refinance loans in the Charleston WV MSA #1480 is adequate. Loans to low income borrowers are less than the percentage of low income families. Low income market share meets overall market share. Loans to moderate income borrowers are less than the percentage of moderate income families. Moderate income market share meets the overall market share. The distribution of home improvement loans in the seven contiguous nonmetropolitan counties area is adequate. Loans to low income borrowers are less than the percentage of low income families. Low income market share is less than overall market share. Loans to moderate income borrowers are less than the percentage of moderate income families. Moderate income market share is less than overall market share. The distribution of home refinance loans in the Washington DC-MD-VA-WV MSA#8840 is excellent. Loans to low income borrowers meet the percentage of low income families. Low income market share exceeds overall market share. Loans to moderate income borrowers exceed the percentage of moderate income families. Moderate income market share meets the overall market share.

Small Business Loans

Refer to Table 10 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

The overall distribution of the bank's small business loans by income level of the borrowers in those AAs that received full scope reviews is excellent. The bank's performance in the Charleston WV MSA #1480 is excellent. The bank's performance in the Washington DC-MD-VA-WV MSA#8840 and seven nonmetropolitan counties AAs is good. In each AA the bank's percentage of lending to businesses with revenues of \$1 million or less exceeds the percentage of those businesses in the AAs. The percentage of loans that City made to those businesses exceeds the market percentage in the Charleston WV MSA#1480 and meets the market percentages in the Washington DC-MD-VA-WV MSA#8840 and seven nonmetropolitan county AAs.

Community Development Lending

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

City's level of community development loans was adequate. There were 17 loans totaling \$1.2 million. The substantial majority of the loans are attributed to a statewide project, the West Virginia Capital Corporation (WVCC). Of this amount, \$806,353 represents City's share of 15 loans funded by WVCC. There is also a \$244,593 line of credit to WVCC. In addition, there was a \$34,300 loan to a community development organization (Southwestern Community Action Council, Inc.). This organization provides nutrition centers to low- and moderate-income persons throughout southwestern West Virginia. WVCC is a statewide Community Development Corporation (CDC) owned by a group of 56 financial institutions and the West Virginia Bankers Association. The organization's primary focus is to promote economic development by making loans to small businesses which fail to meet normal bank lending requirements but are above the venture capital risk level. In addition, City made a \$150,000 line of credit to the Mason County Economic Development Authority. This organization promotes economic development by promoting small business retention and expansion and jobs creation and retention as outlined in the Appalachian Regional Commission Economic Development Plan.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the four nonmetropolitan noncontiguous counties is consistent with the bank's overall performance under the Lending Test in State of West Virginia. Refer to the Tables 1 through 11 in the state of West Virginia section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in West Virginia is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Charleston, WV MSA#1480, the West Virginia Portion of MSA #8840, and the seven contiguous nonmetropolitan counties in West Virginia is adequate.

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

City has provided an adequate level of qualified community development investments within the Charleston WV MSA #1480, Washington DC-MD-VA-WV MSA#8840, and seven nonmetropolitan counties AAs, based on its size and available opportunities. Investment opportunities in West Virginia have been limited historically but are increasing. During the past two years, significant efforts have been initiated to increase public and private partnerships to increase community development opportunities. The bank's adequate performance in its AAs is derived primarily from a large investment which benefits the broader region wide area that includes the bank's AAs but primarily benefits West Virginia. That investment of \$2.6 million occurred in 1998 and is in a Small Business Investment Company (SBIC). There are five partners in this limited partnership with City being the only bank partner.

In addition, City made donations and grants to 35 community development organizations totaling \$113,000. The bank's donations to these organizations were allocated to organizations that serve low and moderate income individuals and promote community development in low and moderate income areas. These funds were allocated to organizations that provide small business financing, homeless shelter, soup kitchens, youth programs, and day care services.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Investment Test in the four nonmetropolitan noncontiguous counties is consistent with the bank's overall "Low Satisfactory rating" performance under the Investment Test in the State of West Virginia. Refer to the Tables 12 in the state of West Virginia section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in State of West Virginia is rated "Low Satisfactory." Based on full scope reviews, the bank's performance in the Charleston, WV MSA #1480, the West Virginia portion of the Washington DC-MD-VA-WV MSA #8840, and the seven nonmetropolitan contiguous counties is adequate.

Retail Banking Services

Refer to Table 13 in the state of West Virginia section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

City's delivery systems are reasonably accessible to geographies and individuals of different income levels within its AAs in the state based upon population demographics and locations of the bank's branches and ATMs. There have been no branch closings. City opened two branches during this period, one in a low income area and the other in a middle income area. Branch hours and services are tailored to meet the needs of their community.

Community Development Services

City has provided an adequate level of community development services throughout its assessment areas in the state based on its size and opportunities. The volume of organizations primarily engaged in community development has historically been low in West Virginia but is increasing. Bank officers have provided technical assistance to four organizations that specifically targeted these assessment areas and two that provide a statewide benefit. Primary services include the provision of financial expertise; assistance in marketing efforts; fund raising efforts; and board/committee membership. Some examples of the services provided include:

- C **West Virginia Small Business Development Company (SBDC)** - This organization provides specialized managerial and technical assistance, counseling, and training to prospective and existing small business owners throughout the state of West Virginia. A bank loan officer provided technical assistance on financial matters to potential small business owners during this evaluation period.
- C **West Virginia Capital Corporation (WVCC)** - This is a privately owned company in which many West Virginia financial institutions pool their money to share the risks of helping enterprises grow. WVCC generally makes loans to existing small and medium side companies which required a source of supplemental financing in order to meet growth needs. A senior loan officer of City serves on the Board of this statewide organization and provides technical assistance on financial matters.
- C **Upper Kanawha Valley Economic Development Corporation** - This organization promotes economic development by assisting in the retention and expansion of existing businesses and providing construction of affordable housing and rental property renovations. The Upper Kanawha Valley area has been designated as an enterprise community and targeted by federal funds for redevelopment. Two officers of City provided technical assistance on financial matters to small businesses.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Service Test in the four nonmetropolitan non-contiguous counties in the State of West Virginia is consistent with the bank's overall "Low Satisfactory Rating" performance under the Service Test in the state of West Virginia. Refer to Table 13 in the state of West Virginia section of Appendix D for the facts and data that

support these conclusions.

State Rating

CRA Rating for the State of Ohio:	<u>Satisfactory</u>
The Lending Test is rated:	<u>Low Satisfactory</u>
The Investment Test is rated:	<u>Low Satisfactory</u>
The Service Test is rated:	<u>Low Satisfactory</u>

This rating is weighted into the overall bank rating in proportion to its size within City's operations. City did not have a presence in the Ohio market until November 1998.

Description of Bank's Operations in the state of Ohio

City operates one branch in this state which is located in Meigs County, Ohio. Meigs County is located in the southeast portion of the state bordering on West Virginia. There are six census tracts in City's AA in Meigs County. There are no low income tracts. Eighty-three percent of the census tracts are moderate income and 17% are middle income tracts.

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 the State of Ohio

City did not have a presence in the Ohio market until November 1998. The bank's deposit market share in this AA is nominal and loans made during the evaluation were not significant. Our analysis was limited to evaluating whether the bank's activity was consistent with what can be expected given the bank's resources, recent entry into the market, and demographic information. Because the bank did not have a presence in Ohio until late 1998, market rank and market share information was not available.

Lending Test

Lending Activity

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

City's performance in meeting the credit needs within its AA during its short presence is adequate. City made 70 loans totaling \$2.5 million since entering the Ohio market. There were 37 HMDA loans totaling \$1.2 million and 33 small business loans totaling \$1.3 million. There were no unexplained

conspicuous gaps in the bank's lending activities.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

There are no low income geographies in this AA. City's distribution of HMDA loans to moderate income geographies is good. The distribution of home purchase, improvement, and refinance loans is very similar and meets the percentage of owner occupied units in moderate income areas.

Small Business Loans

The distribution of City's 33 small business loans is excellent and exceeds the percentage of businesses in moderate income areas. There are no low income geographies in this AA.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

The overall distribution of City's HMDA loans is adequate considering the bank's recent entry into the Ohio market and loan volume. Home purchase and home improvement loans are identified credit needs. There were no home purchase loans to low or moderate income borrowers. City's home improvement loans to low and moderate income borrowers exceed the percentage of low- and moderate-income families in the AA. Home refinance loans to low income borrowers are less than the percentage of low income families. Home refinance loans to moderate income borrowers meet the percentage of moderate income families.

Small Business Loans

City's lending to small businesses is excellent. The percentage of loans to small businesses exceeds the percentage of small businesses. City's small loans to businesses are good. Market data was not available.

INVESTMENT TEST

City made an adequate level of qualified investments within its AA given the bank's recent entry into the Ohio market. During 1998, City made an investment in a region-wide SBIC which benefits a four state regional area which includes the bank's AA.

SERVICE TEST

Retail Banking Services

Refer to Table 13 in the state of Ohio section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

City's overall performance in the Service Test is adequate. The bank's branch is reasonably accessible to geographies and individuals of different income levels based on the population demographics. The branch is located in a moderate income area. Eighty-six percent of the population is located in moderate income census tracts. Branch hours and services are tailored to meet the needs of the geographies.

Community Development Services

City provided an adequate level of community development services within its AA. Several bank officers have provided assistance to various community development organizations by serving on loan review committees, assisting in marketing and fund raising efforts and providing financial expertise. These organizations promote economic development by creating jobs, providing affordable housing, and developing small businesses. Some examples of the services include:

- < **Regional Economical Development Authority** - This organization promotes economic development by assisting in financing small businesses throughout Meigs County, which has been designated as a distress county in the Appalachian Region. An executive officer of the bank serves on the Board of Directors of this organization and provides technical assistance by serving on the loan review committee of this organization.

- < **Meigs County Community Improvement Corporation** - This nonprofit organization is affiliated with the county government. The county has been targeted by the Appalachian Regional Commission for redevelopment as a distressed county. An executive officer of the bank provides technical assistance to this organization by soliciting and obtaining grant money to create a local industrial park. This organization promotes activities that revitalize and stabilize low- or moderate-income geographies.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “Full Scope”) and those that received a less comprehensive review (designated by the term “Limited Scope”).

Time Period Reviewed	Lending Test: January 1, 1998 to December 31, 1998 Investment Test: January 1, 1997 to July 12, 1999 Service Test: January 1, 1997 to July 12, 1999	
Financial Institution	Products Reviewed	
City National Bank of West Virginia (City) Charleston, West Virginia	Home Mortgage, Small Business and Community Development Loans	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Huntington, WV/Ashland, KY/Ironton, OH MSA #3400	Full Scope	
State of West Virginia Charleston WV MSA#1480	Full Scope	
Washington DC-MD-VA-WV MSA #8840	Full Scope	
Seven Contiguous Nonmetropolitan Counties	Full Scope	
Four Noncontiguous Nonmetropolitan counties	Limited Scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		CITY NATIONAL BANK OF WEST VIRGINIA		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
City National Bank of West Virginia	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Huntington, WV/Ashland, KY/Ironton, OH Multi-state #3400	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of West Virginia	Low Satisfactory	Low satisfactory	Low Satisfactory	Satisfactory
State of Ohio	Low Satisfactory	Low Satisfactory	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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Market Profiles for Areas Receiving Full-Scope Reviews

Huntington, WV/Ashland, KY/Ironton, OH Multi-state MSA #3400	31
Charleston WV MSA #1480	32-33
Washington DC-MD-VA-WV MSA #8840	34
Seven Contiguous Nonmetropolitan Counties/WV	35
Meigs County, OH	37

Huntington, WV/Ashland, KY/Ironton, OH Multi-state MSA #3400

Demographic Information for Full-Scope Area: Huntington, WV/Ashland, KY/Ironton, OH Multistage MSA #3400						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	47	6	23	47	19	5
Population by Geography	157,479	4	20	53	23	0
Owner-Occupied Housing by Geography	67,863	< 1	18	56	26	0
Businesses by Geography	4,147	18	21	42	19	0
Farms by Geography	56	2	18	46	34	0
Family Distribution by Income Level	43,900	24	17	18	41	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	8,889	4	96	0	0	0
Median Family Income	\$26,735	Median Housing Value		\$48,322		
HUD Adjusted Median Family Income for 1999	\$32,900	Unemployment Rate February 1999		7.3%		
Households Below the Poverty Level	21%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

The Huntington-Ashland-Ironton MSA consists of six counties in three adjoining states (West Virginia, Kentucky, and Ohio). City has designated select portions of three of the six counties that make up the Huntington-Ashland-Ironton MSA. City's AA within the Huntington MSA consists of 47 census tracts. Of these census tracts, 7% is low income, 23% is moderate income, 47% is middle income, 19% is upper income and 4% are unclassified. Included in City's AA are portions of Cabell and Wayne County, West Virginia and portions of Lawrence County, Ohio. Wayne County is primarily rural. Local manufacturing products include chemicals, building materials products, apparel, wood and glassware. Cabell County encompasses most of Huntington which is the second largest city in West Virginia. Its manufacturers produce nickel alloys, railway and mine cars, rod bolts, steel beams, rails, furniture, clothing, glassware, and chemicals. Lawrence County, Ohio's county seat is Ironton, a heavily industrialized strip bordering the Ohio River. Steel, cement, and chemicals are produced here. Most of Lawrence County is rural.

We identified community credit and development needs by reviewing the most recent Huntington, WV Department of Housing and Urban Development Consolidated Executive Plan and community contact forms from prior contacts performed by examiners. The needs identified include: rental and home buyer assistance for low- and moderate-income persons; rehabilitation of aging rental and owner-occupied housing; housing for the elderly and physically disabled; added child-care capacity; job training; and economic development activities designed to expand the job base. Opportunities for community development needs and services include the HOME Investment Partnership Program, Emergency Shelter Grant, Economic Development Initiative grants and the Cabell-Huntington-Wayne Housing Consortium.

State of West Virginia Full-Scope Areas

Charleston West Virginia MSA #1480

Demographic Information for Full-Scope Area: Charleston WV MSA #1480						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	61	2	21	56	21	0
Population by Geography	250,454	1	19	57	23	0
Owner-Occupied Housing by Geography	71,089	< 1	18	58	24	0
Businesses by Geography	7,371	13	20	45	22	0
Farms by Geography	62	3	16	53	28	0
Family Distribution by Income Level	71,638	21	18	21	40	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	13,476	2	98	0	0	0
Median Family Income	\$31,235	Median Housing Value		= \$58,052		
HUD Adjusted Median Family Income for 1999	\$38,900	Unemployment Rate February 1999		= 4.9%		
Households Below the Poverty Level	15%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

City's AA includes the entire MSA which is comprised of Kanawha and Putman Counties. The Charleston MSA is the bank's primary assessment area. The Charleston MSA is located in the southwestern portion of the state. The Charleston MSA contains the seat of state government which is the single largest employer. The medical field with four major hospitals is also a major employer. The chemical industry and its related industries continue to play a prominent, but declining role.

As of June 30, 1998, City had 44% of its deposits in the Charleston MSA. City operates 14 branches and 24 ATMs in the AA. There are 61 census tracts located in Kanawha and Putman counties. Of these census tracts, 2% is designated low income, 21% is moderate income, 56% is middle income, and 21% is upper income.

During this examination, we held discussions with one community representative to help determine the community credit and development needs in the AA. We also reviewed information from previous community meetings by other regulatory agencies and the Consolidated HUD plan for the MSA. Our contact identified affordable housing loans either directly from the banks or through nonprofit agencies as a credit need. Also, consumer credit counseling for low and moderate income persons who do not know how to deal with banks or who need help to reestablishing credit was identified as a need.

We also identified several investment opportunities in the Charleston MSA. Opportunities include: providing home ownership, micro-enterprise and banking education; increasing cooperation among nonprofit organizations, government agencies, businesses, and financial institutions to identify additional home ownership opportunities for low- and moderate income individuals and geographies; and increase financial and technical assistance resources for small business and micro-enterprise development.

State of West Virginia Full-Scope Areas

Washington DC-MD- VA-WV MSA #8840

Demographic Information for Full-Scope Area: Washington DC-MD-VA-WV MSA #8840						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	18	0	100	0	0	0
Population by Geography	95,179	0	100	0	0	0
Owner-Occupied Housing by Geography	25,599	0	100	0	0	0
Businesses by Geography	2,156	0	100	0	0	0
Farms by Geography	71	0	100	0	0	0
Family Distribution by Income Level	25,850	37	31	20	12	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	25,850	0	100	0	0	0
Median Family Income	\$33,395	Median Housing Value				\$75,427
HUD Adjusted Median Family Income for 1999	\$72,300	Unemployment Rate February 1999				3.6%
Households Below the Poverty Level	12%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

City operates 5 branches and 5 full service ATMs in this AA. Only 7% of City's deposits are in this AA. The AA consists of Berkeley and Jefferson Counties, the West Virginia portion of the Washington DC-MD-VA-WV MSA. Nearby metropolitan cities include Washington, D.C., Baltimore, MD, and Harrisburg, PA. There are 18 census tracts in this AA. All of the tracts are moderate income tracts.

Competition in the AA includes 32 financial institutions and branches of multi-state regional companies. Major employment in Jefferson County includes textiles, chemical, limestone, dolomite quarrying, and metal fabrication and assemblies which provide many skilled jobs. Berkeley county major employers include General Motors Corporation, Internal Revenue Service Data Center, US Postal Data Center, Veterans Administration Hospital, Berkeley County Board of Education and Corning Consumer Products Company.

State of West Virginia Full-Scope Areas

Seven Contiguous Nonmetropolitan Counties

Demographic Information for Full-Scope Area: Seven Contiguous Nonmetropolitan Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	52	0	17	73	10	0
Population by Geography	242,431	0	10	81	9	0
Owner-Occupied Housing by Geography	71,055	0	11	76	13	0
Businesses by Geography	5,264	0	10	71	19	0
Farms by Geography	69	0	4	77	19	0
Family Distribution by Income Level	242,431	22	18	19	41	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	62,682	11	89	0	0	0
Median Family Income	\$22,500	Median Housing Value		\$28,200		
HUD Adjusted Median Family Income for 1999	\$28,200	Unemployment Rate February 1999		10.3%		
Households Below the Poverty Level	22%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

City operates 15 branches and 18 full service ATMs in this AA. The AA includes seven contiguous nonmetropolitan counties which are located in the Appalachian Region of West Virginia. These include Braxton, Fayette, Greenbrier, Nicholas, Raleigh, Summers and Wyoming counties. These are very distressed counties with high rates of poverty and unemployment. The AA includes 52 census tracts. Of these census tracts, 17% is moderate income, 73% is middle income and 10% is upper income. There are no low income census tracts in the AA. The area's economy has traditionally been highly dependent on coal.

Competition in the AA is dominated by several large regional and community banks. To help determine community credit needs, we contacted one local nonprofit organization during this examination. The contact identified the greatest needs in this area to be decent housing and employment. There are opportunities for affordable housing in this assessment area and job creation.

We reviewed prior community contact forms and the state of WV Consolidated HUD Plan which identified community credit needs to include: affordable single family housing for low and moderate income persons; programs serving first-time home buyers; rehabilitation of substandard housing occupied by elderly renters and owners; job creation/retention; micro-loans for small businesses; and community/neighborhood revitalization. Opportunities for community and development partnering

include: the Appalachian By Design (small business/farm financing); Federation of Appalachian Housing Enterprises (affordable housing and revitalization); HOME Investment Partnership Programs, and the West Virginia Housing Development Fund.

State of Ohio Full-Scope Areas

Meigs County, Ohio

Demographic Information for Full-Scope Area: Meigs County, Ohio						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	6	0	83	17	0	0
Population by Geography	22,987	0	86	14	0	0
Owner-Occupied Housing by Geography	6,814	0	84	16	0	0
Businesses by Geography	474	0	72	28	0	0
Farms by Geography	23	0	78	22	0	0
Family Distribution by Income Level	6,580	34	22	19	25	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	5,655	0	100	0	0	0
Median Family Income	\$21,804	Median Housing Value		\$35,706		
HUD Adjusted Median Family Income for 1999	\$40,500	Unemployment Rate January 1999		14%		
Households Below the Poverty Level	26%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

City operates one branch in this state which is located in Meigs County, Ohio. Meigs County is located in the southeast portion of the state bordering on West Virginia. Meigs County is a part of the Ohio Appalachian Region. Its principal industries are coal, wood, products, and agriculture.

There are 6 census tracts in City's AA in Meigs County. There are no low income tracts. Eighty-three percent of the census tracts are moderate income and 17% are middle income tracts.

Appendix D: Tables of Performance Data

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Content of Standardized Tables

A separate set of tables is provided for each state. All multistage metropolitan areas are presented in one set of tables. The tables cover the entire CRA evaluation period. 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; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (<\$1 million) to businesses originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (<\$500,000) to farms originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares

the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations - See Table 7.

Table 9. Borrower Distribution of HMDA Refinance Loan Originations - See Table 7.

Table 10. Borrower Distribution of Small Business Loan Originations - Compares the percentage distribution of the number of small loans (<\$1 million) originated by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 11. Borrower Distribution of Small Farm Loan Originations - Compares the percentage distribution of the number of small loans (<\$500 thousand) originated by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 12. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.

Table 13. Distribution of Branch and ATM Delivery System - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 14. Geographic and Borrower Distribution of Consumer Loan Originations (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 the population 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 MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME		State: Multi-state MSA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998						
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope:												
Huntington-WV/Ashland-KY/Ironton-OH MSA #3400	100%	215	12,746	12	1,623	0	0	1	34	228	14,403	100%

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE		State: Multi-state MSA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998										
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Huntington-WV/Ashland-KY/Ironton-OH MSA#3400	.43%	1.05%	17.69%	17.89%	55.82%	48.42%	26.06%	32.64%	10	3.81	0	4.71	3.77	3.64	95	100%

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT																State: Multi-state MSA		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans				
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Huntington-WV/Ashland-KY/Ironton-OH MSA #3400	.43%	0%	17.69%	22.22%	55.82%	66.67%	26.06%	11.11%	0	0	0	0	0	0	9	100%			

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE																State: Multi-state MSA		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans				
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Huntington-WV/Ashland-KY/Ironton-OH MSA #3400	.43%	.93%	17.69%	28.70%	55.82%	49.07%	26.06%	21.30%	3	6.79	0	17.7	7.5	1.5	108	100%			

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS																	State: Multi-state MSA		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans								
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
Huntington-WV/Ashland-KY/Ironton-OH MSA #3400	18.16%	8.33%	21.27%	8.34%	41.19%	33.33%	19.38%	50.00%	16	.66	1.83	0	.61	.56	12	100%							

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM																	State: Multi-state MSA		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans								
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
Huntington-WV/Ashland-KY/Ironton-OH MSA #3400	1.79%	0%	17.86%	0%	46.43%	0%	33.92%	0%	2	0	0	0	0	0	0	0%							

(*) Based on 1997 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HOME PURCHASE																	State: Multi-state MSA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998			
MSA/ Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Purchase Loans									
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total								
Full-Scope:																								
Huntington-WV/Ashland-KY/Ironton-OH MSA #3400	23.77%	11.58%	17.17%	33.68%	18.11%	20.00%	40.95%	34.74%	10	3.81	7.46	4.65	4.68	3.09	95	100%								

(*) As a percentage of loans with borrower income information available.

(**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT																	State: Multi-state MSA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998			
MSA/ Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Improvement Loans									
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total								
Full-Scope:																								
Huntington-WV/Ashland-KY /Ironton-OH MSA #3400	23.77%	11.11%	17.17%	55.56%	18.11%	11.11%	40.95%	22.22%	0	0	0	0	0	0	9	100%								

(*) As a percentage of loans with borrower income information available.

(**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE																State: Multi-state MSA		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/ Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans				
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	Rank* *	Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Huntington-WV/Ashland-KY /Ironton-OH MSA #3400	23.77%	8.49%	17.17%	22.64%	18.11%	20.75%	40.95%	48.12%	3	6.79	16.39	11.02	11.50	3.61	108	100%			

(*) As a percentage of loans with borrower income information available. No information was available for 1.85% of loans originated by City.

(**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS											State: Multi-state MSA		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans					
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size			
Full Scope:														
Huntington-WV/Ashland-KY/Ironton-OH MSA #3400	89%	92%	59%	58%	33%	9%	.66	1.10	12	100%	\$135			

(*) As a percentage of businesses with known revenues.

(**) As a percentage of loans with revenue information available.

(***) The market consists of all other Small Business reporters in City's assessment area and is based on 1997 Aggregate Small Business Data only.

(****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM			State: Multi-state MSA			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998					
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Huntington-WV/Ashland-KY/Ironton-OH MSA #3400	100%	0%	100%	0%	0%	0%	0	0	0	0%	\$0

(*) As a percentage of farms with known revenues.

(**) As a percentage of loans with revenue information available.

(***) The market consists of all other Small Farm reporters in City's assessment area and is based on 1997 Aggregate Small Farm Data only.

(****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS			State: Multi-state MSA			Evaluation Period: JANUARY 1, 1997 TO JULY 12, 1999					
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments				
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s		
Full-Scope:											
Huntington-WV/Ashland-KY/Ironton-OH MSA #3400	0	0	\$0	10	3	100%	10	3	100%		

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Areas that is prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																State: Multi-state MSA				Evaluation Period: JANUARY 1, 1997 TO JULY 12, 1999			
MSA/Assessment Area:	Deposits	Branches						ATMs						Population									
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
Full-Scope:																							
Huntington-WV/Ashland-KY/Ironton-OH MSA#3400	100%	4	100%	0%	25%	50%	25%	6	100%	17%	0%	33%	50%	4%	20%	53%	23%						

Table 1. Lending Volume

LENDING VOLUME												State: West Virginia		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
Full-Scope:															
Charleston WV MSA#1480	44%	1,139	94,668	330	26,590	0	0	0	0	1,469	121,258	38.88%			
Washington DC-MD-VA-WV MSA#8840	7%	242	17,021	29	673	0	0	0	0	271	17,694	7.17%			
Seven Nonmetropolitan Areas/WV	27%	864	32,277	232	10,853	20	311	0	0	1,116	43,441	29.53%			
Limited-Scope:															
Four Nonmetropolitan Areas/ WV	22%	655	28,374	223	15,558	26	1,258	1	150	905	45,340	23.95%			
Region-wide	0%	0	0	0	0	0	0	17	1,181	17	1,181	.47%			

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE		State: West Virginia				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998										
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Charleston WV MSA #1480	.14%	.21%	17.47%	12.00%	57.99%	53.05%	24.40%	34.74%	2	9.09	5.56	9.30	10.08	7.59	475	45%
Washington DC-MD-VA-WV MSA#8840	0%	0%	100.00%	100.00%	0%	0%	0%	0%	6	5.17	0	5.46	0	0	129	12%
Seven Nonmetropolitan Areas/WV	0%	0%	10.19%	8.26%	81.06%	86.70%	8.75%	5.04%	16	1.02	0	0	0	0	218	21%
Limited Scope:																
Four Nonmetropolitan Areas/WV	0%	0%	0%	0%	79.99%	89.96%	20.01%	10.04%	14	2.09	0	0	.35	2.06	239	22%

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT																
State: West Virginia																
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Charleston WV MSA #1480	.14%	0%	17.47%	16.22%	57.99%	66.22%	24.40%	17.56%	4	7.06	0	5.93	8.24	4.62	74	17%
Washington-DC-MD-VA-WV MSA#8840	0%	0%	100.00%	100.00%	0%	0%	0%	0%	3	7.63	0	9.05	0	0	30	7%
Seven Nonmetropolitan Areas/WV	0%	0%	10.19%	7.19%	81.06%	92.22%	8.75%	.59%	11	.40	0	0	.58	0	167	39%
Limited Scope:																
Four Nonmetropolitan Areas/WV	0%	0%	0%	0%	79.99%	100.00%	20.01%	0%	11	1.47	0	0	1.35	3.13	155	37%

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE																State: West Virginia		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Refinance Loans				
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Charleston WV MSA #1480	.14%	0%	17.47%	8.26%	57.99%	55.77%	24.40%	35.97%	2	6.32	0	6.60	6.58	5.71	581	41%			
Washington DC-MD-VA-WV MSA#8840	0%	0%	100.00%	100.00%	0%	0%	0%	0%	9	2.54	0	2.82	0	0	83	6%			
Seven Nonmetropolitan Areas/WV	0%	0%	10.19%	11.32%	81.06%	85.12%	8.75%	3.56%	36	.32	0	0	0	.76	477	34%			
Limited Scope:																			
Four Nonmetropolitan Areas/WV	0%	0%	0%	0%	79.99%	84.62%	20.01%	15.38%	23	.94	0	0	.83	.63	260	19%			

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS																
State: West Virginia																
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Charleston WV MSA #1480	12.67%	6.06%	20.27%	13.33%	44.58%	54.24%	22.48%	26.37%	3	12.62	6.08	5.96	14.30	15.70	330	40%
Washington DC-MD-VA-WV MSA #8840	0%	0%	100.00%	100.00%	0%	0%	0%	0%	9	3.10	0	3.10	0	0	29	4%
Seven Nonmetropolitan Areas/WV	0%	0%	10.28%	9.91%	70.74%	87.50%	18.98%	2.59%	4	10.30	0	8.28	13.67	0.41	232	29%
Limited Scope:																
Four Nonmetropolitan Areas/WV	0%	0%	0%	0%	81.22%	88.34%	18.77%	11.66%	1	30.15	0	0.00	34.40	13.21	223	27%

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM																
State: West Virginia																
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Up p	#	% of Total
Full-Scope:																
Charleston WV MSA #1480	3.23%	0%	16.13%	0%	53.23%	0%	27.41%	0%	0	0	0	0	0	0	0	0%
Washington DC-MD-VA-WV MSA #8840	0%	0%	100.00%	0%	0%	0%	0.00%	0%	1	45.00	0	42.86	0	0	0	0%
Seven Nonmetropolitan Areas WV	0%	0%	4.35%	0%	76.81%	100.00%	18.84%	0%	1	28.69	0	0	30.70	0	20	43%
Limited Scope:																
Four Nonmetropolitan Areas WV	0%	0%	0%	0%	88.64%	100.00%	11.36%	0%	1	54.17	0	0	61.90	0	26	57%

(*) Based on 1997 Aggregate Small Business Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HOME PURCHASE																	State: West Virginia		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/ Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Purchase Loans					
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Charleston WV MSA #1480	21.16%	6.74%	18.36%	19.57%	21.00%	25.22%	39.48%	48.47%	2	9.09	8.47	13.91	10.31	7.68	475	45%				
Washington DC-MD-VA-WV MSA #8840	36.85%	39.52%	31.63%	26.61%	19.74%	20.16%	11.78%	13.71%	7	5.46	7.23	5.03	5.63	3.67	129	12%				
Seven Nonmetropolitan Areas/ WV	22.26%	6.94%	17.93%	18.06%	19.43%	25.93%	40.38%	49.07%	16	1.02	0	.68	1.09	1.36	218	21%				
Limited-Scope:																				
Four Nonmetropolitan Areas/ WV	18.58%	5.04%	15.37%	13.03%	20.00%	24.37%	46.05%	57.56%	14	2.09	0	2.24	4.10	1.58	239	22%				

(*) As a percentage of loans with borrower income information available. No information was available for 2.16% of loans originated by City.

(**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT State: West Virginia Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998																
MSA/ Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank* *	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Charleston WV MSA #1480	21.16%	8.96%	18.36%	28.36%	21.00%	32.84%	39.48%	29.84%	4	7.06	5.39	5.35	9.12	7.47	74	17%
Washington-DC-MC-VA-WV MSA #8840	36.85%	44.83%	31.63%	27.59%	19.74%	24.14%	11.78%	3.44%	3	9.05	8.41	5.96	8.79	5.71	30	7%
Seven Nonmetropolitan Areas/ WV	22.26%	14.11%	17.93%	22.09%	19.43%	25.15%	40.38%	38.65%	11	.40	0	0	0	.94	167	39%
Limited-Scope:																
Four Nonmetropolitan Areas/ WV	18.58%	9.74%	15.37%	18.83%	20.00%	31.17%	46.05%	40.26%	11	1.47	2.13	2.56	0	1.64	155	37%

(*) As a percentage of loans with borrower income information available. No information was available for 3.05% of loans originated by City.

(**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE State: West Virginia Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998																
MSA/ Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Charleston WV MSA #1480	21.16%	3.65%	18.36%	12.96%	21.00%	23.91%	39.48%	59.49%	2	6.32	7.39	6.56	7.05	6.62	581	41%
Washington-DC-MD-VA-WV MSA #8840	36.85%	37.97%	31.63%	35.44%	19.74%	18.99%	11.78%	7.59%	8	2.82	4.19	2.04	3.11	1.11	83	6%
Seven Nonmetropolitan Areas/ WV	22.26%	7.87%	17.93%	9.79%	19.43%	24.89%	40.38%	57.45%	36	.32	0	0	0	.64	477	34%
Limited-Scope:																
Four Nonmetropolitan Areas/ WV	18.58%	3.53%	15.37%	7.45%	20.00%	20.78%	46.05%	68.24%	23	.94	3.85	0	.52	1.33	260	19%

(*) As a percentage of loans with borrower income information available. No information was available for 3.52% of loans originated by City.

(**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS												State: West Virginia		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998								
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans													
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size											
Full Scope:																						
Charleston WV MSA #1480	69%	90%	46%	79%	15%	6%	12.62	23.71	330	40%	\$81											
Washington-DC-MD-VA-WV MSA #8840	73%	100%	65%	100%	0%	0%	3.10	4.68	29	4%	\$23											
Seven Nonmetropolitan Areas/ WV	72%	89%	38%	90%	8%	2%	10.30	16.95	232	29%	\$47											
Limited Scope:																						
Four Nonmetropolitan Areas/ WV	74%	91%	37%	86%	7%	7%	30.15	48.32	223	27%	\$70											

(*) As a percentage of businesses with known revenues.

(**) As a percentage of loans with revenue information available.

(***) The market consists of all other Small Business reporters in City's assessment area and is based on 1997 Aggregate Small Business Data only.

(****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM State: West Virginia Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998												
MSA/Assessment Area	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans			
	% of Farm'	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size	
Full Scope:												
Charleston WV MSA #1480	95%	0%	100%	0%	0%	0%	0	0	0	0%	\$0	
Washington-DC-MD-VA-WV MSA #8840	90%	0%	91%	0%	0%	0%	45.00	42.86	0	0%	\$0	
Seven Nonmetropolitan Areas/WV	91%	100%	93%	100%	0%	0%	28.69	30.97	20	43%	\$16	
Limited Scope:												
Four Nonmetropolitan Areas/WV	91%	100%	17%	88%	4%	8%	54.17	92.86	26	57%	\$48	

(*) As a percentage of farms with known revenues.

(**) As a percentage of loans with revenue information available.

(***) The market consists of all other Small Farm reporters in City's assessment area and is based on 1997 Aggregate Small Farm Data only.

(****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
State: West Virginia			Evaluation Period: JANUARY 1, 1997 TO July 12, 1999						
MSA/Assessment Area:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Charleston WV MSA #1480	0	0	\$0	15	64	100%	15	64	2.35%
Washington-DC-MD-VA-WV MSA #8840	0	0	\$0	3	4	100%	3	4	.15%
Seven Nonmetropolitan Areas/ WV	0	0	\$0	6	22	100%	6	22	.61%
Limited Scope:									
Four Nonmetropolitan Areas/ WV	0	0	\$0	11	23	100%	11	23	.84%
Region-wide	0	0	\$0	1	2,610	100%	1	2,610	95.85%

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Areas that is prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				State: West Virginia				Evaluation Period: JANUARY 1, 1997 TO July 12, 1999									
MSA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Charleston WV MSA #1480	44%	14	34%	14%	7%	36%	43%	22	40%	14%	14%	27%	45%	1%	19%	58%	22%
Washington-DC-MD-VA-WV MSA #8840	7%	5	12%	0%	100%	0%	0%	5	9%	0%	100%	0%	0%	0%	100%	0%	0%
Seven Nonmetropolitan Areas/ WV	27%	13	32%	0%	0%	100%	0%	15	27%	0%	7%	80%	13%	0%	10%	81%	9%
Limited Scope:																	
Four Nonmetropolitan Areas/ WV	22%	9	22%	0%	0%	89%	11%	7	13%	0%	14%	86%	0%	0%	0%	81%	19%

Table 1. Lending Volume

LENDING VOLUME													State: Ohio		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full-Scope:																
Meigs County, OH	100%	37	1,207	33	1,361	0	0	0	0	70	2,568	100%				

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE													State: Ohio		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Meigs County, OH	0%	0%	85.69%	76.92%	14.31%	23.08%	0%	0%	0	0	0	0	0	0	13	100%

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT										State: Ohio		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998						
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans			
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total		
Full-Scope:																		
Meigs County, OH	0%	0%	85.69%	77.78%	14.31%	22.22%	0%	0%	0	0	0	0	0	0	9	100%		

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE										State: Ohio		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998						
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans			
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total		
Full-Scope:																		
Meigs County, OH	0%	0%	85.69%	78.57%	14.31%	21.43%	0%	0%	0	0	0	0	0	0	14	100%		

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS																State: Ohio		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998					
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans								
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
Meigs County, OH	0%	0%	71.94%	90.91%	28.06%	9.09%	0%	0%	1	22.67	0	23.2 1	26.3 2	0	33	100%							

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM																State: Ohio		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998					
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans								
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
Meigs County, OH	0%	0%	78.26%	0%	21.74%	0%	0%	0%	0	0	0	0	0	0	0	0%							

(*) Based on 1997 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HOME PURCHASE																	State: Ohio		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998				
MSA/ Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Purchase Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
Meigs County, OH	33.98%	0%	21.76%	0%	19.18%	53.85%	25.08%	46.15%	0	0	0	0	0	0	13	100%							

(*) As a percentage of loans with borrower income information available. .

(**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT																	State: Ohio		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998				
MSA/ Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Improvement Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
Meigs County, OH	33.98%	33.33%	21.76%	22.22%	19.18%	22.22%	25.08%	22.23%	0	0	0	0	0	0	9	100%							

(*) As a percentage of loans with borrower income information available.

(**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE State: Ohio Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998																
MSA/ Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	Rank* *	Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Meigs County, OH	33.98%	14.29%	21.76%	21.43%	19.18%	21.43%	25.08%	42.85%	0	0	0	0	.0	0	14	100%

(*) As a percentage of loans with borrower income information available.

(**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS State: Ohio Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998												
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans			
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size	
Full-Scope:												
Meigs County, OH	76%	85%	53%	91%	6%	3%	.37	.52	33	100%	\$41	

(*) As a percentage of businesses with known revenues.

(**) As a percentage of loans with revenue information available.

(***) The market consists of all other Small Business reporters in City's assessment area and is based on 1997 Aggregate Small Business Data only.

(****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM State: Ohio Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1998											
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Meigs County, OH	96%	0%	100%	0%	0%	0%	0	0	0	0%	\$0

(*) As a percentage of farms with known revenues.

(**) As a percentage of loans with revenue information available.

(***) The market consists of all other Small Farm reporters in City's assessment area and is based on 1997 Aggregate Small Farm Data only.

(****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: Ohio Evaluation Period: JANUARY 1, 1997 TO JULY 12, 1999									
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Meigs County, OH	0	0	\$0	0	0	0%	0	0	0%

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Areas that is prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																State: Ohio				Evaluation Period: JANUARY 1, 1997 TO JULY 12, 1999			
MSA/Assessment Area:	Deposits	Branches						ATMs						Population									
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
Full-Scope:																							
Meigs County, OH	100%	1	100%	0%	100%	0%	0%	0	0%	0%	0%	0%	0%	0%	86%	14%	0%						