



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Peoples Bank, National Association
Charter Number: 5552

138 Putnam Street
Marietta, Ohio 45750

Office of the Comptroller of the Currency

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

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THE AA IS PRIMARILY A RURAL AREA WITH VILLAGES, TOWNSHIPS, AND SMALL CITIES LOCATED THROUGHOUT. WHILE MODERATE-INCOME AREAS COMPRISE ONE-THIRD OF ALL GEOGRAPHIES, THERE IS ONLY ONE DESIGNATED LOW-INCOME CENSUS TRACT WITHIN THE ENTIRE AREA. MIDDLE-INCOME TRACTS COMPRISE NEARLY 60 PERCENT OF ALL GEOGRAPHIES, AND ALL WERE DESIGNATED AS DISTRESSED AND/OR UNDERSERVED DURING AT LEAST A PORTION OF THE EVALUATION PERIOD. 5

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THE AA IS PRIMARILY RURAL. WHILE THERE ARE NO LOW- OR MODERATE-INCOME GEOGRAPHIES, THE AREA IS PRIMARILY COMPRISED OF MIDDLE-INCOME CENSUS TRACTS, ALL OF WHICH WERE DESIGNATED AS DISTRESSED FOR THE MAJORITY OF THE EVALUATION PERIOD. U.S. CENSUS BUREAU DATA REFLECTS THAT THE LEADING EMPLOYMENT SECTORS ARE GOVERNMENT, RETAIL, HEALTH CARE / SOCIAL ASSISTANCE IN MASON COUNTY, AND GOVERNMENT AND RETAIL IN WETZEL COUNTY. U.S. BUREAU OF LABOR STATISTICS DATA REFLECTS THAT THE UNEMPLOYMENT RATE IN WEST VIRGINIA INCREASED DURING THE EVALUATION PERIOD. THE ANNUAL UNADJUSTED UNEMPLOYMENT LEVEL WENT FROM 4.5 PERCENT IN 2006 TO 7.9 PERCENT IN 2009. BOTH MASON AND WETZEL COUNTIES HAVE BEEN HIGHER THAN THE STATE AVERAGE. AS OF OCTOBER 2010, THE UNADJUSTED RATE IN MASON COUNTY WAS 11.7 PERCENT, AND 11.5 PERCENT IN WETZEL COUNTY. 8

JUNE 30, 2010 FDIC DEPOSIT DATA REFLECTS THAT PBNA IS RANKED FIRST IN SIZE WITHIN THE AREA WITH 28 PERCENT OF THE INSURED DEPOSIT MARKET. FINANCIAL INSTITUTIONS RANGE FROM LOCAL COMMUNITY BANKS TO REGIONAL COMPANIES. COMPETITION IS STRONG AS THERE ARE 10 INSURED INSTITUTIONS OPERATING 20 OFFICES IN THIS TWO-COUNTY AREA WITH A POPULATION UNDER 50 THOUSAND. MANY COMPETITORS DO NOT HAVE BRANCHES LOCATED IN THE AREA OR ARE NOT DEPOSITORY INSTITUTIONS. ACCORDING TO AGGREGATE HMDA DATA, 50 LENDERS ORIGINATED HOME MORTGAGE LOANS IN THE AA DURING 2009. 8

APPENDIX D: TABLES OF PERFORMANCE DATA 1

Overall CRA Rating

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

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

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

*The Lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The borrower distribution of lending is good in all of the bank’s rating areas.
- The geographic distribution of loans is good overall.
- Qualified investment activity is adequate overall, with good activity levels in the Huntington-Ashland Multistate and State of Ohio rating areas.
- PBNA offices are readily accessible to geographies and individuals of different income levels in most rating areas.
- PBNA has an excellent record of participating in community development initiatives within its local communities.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

Geography: A census tract 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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

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

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

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

Peoples Bank, National Association (PBNA) is a full service interstate bank headquartered in Marietta, Ohio. With 44 banking offices in southeast Ohio and the neighboring parts of Kentucky and West Virginia, PNBA had total assets of \$1.9 billion as of September 30, 2010. PBNA is a wholly-owned subsidiary of Peoples Bancorp, Inc. a \$2 billion one-bank holding company also located in Marietta.

PNBA offers a full range of banking products and services for consumers and businesses. Financial advisory services are offered through its Peoples Financial Advisors division. Insurance products are offered through Peoples Insurance Agency, LLC. As of September 30, 2010 the bank's \$1 billion loan portfolio was comprised of real estate secured loans (74 percent), commercial loans (17 percent), loans to individuals (8 percent), and other loans (1 percent). Within the real estate segment, 50 percent were for non-farm / non residential purposes, 36 percent for 1-4 family residential, 7 percent were multifamily, and 7 percent construction and development. Tier 1 Capital was \$164.5 million as of September 30, 2010, which included funds obtained through the bank's participation in the Troubled Asset Relief Program (TARP) Capital Purchase Program.

At the bank's request, we considered investments made by Peoples Capital Corporation, a subsidiary of the holding company. We also considered CRA-qualified grants provided by Peoples Bancorp Foundation, Inc. The foundation was formed and incorporated as a non-profit for charitable purposes in September 2003, focusing on community investment and economic development, youth and education, human services programs that improve the social needs of low- and moderate-income communities and individuals, and arts and culture. These affiliates increase PBNA's capacity to reinvest in the community through qualified investments. We also considered CRA-qualified community development services provided by staff members of Peoples Financial Advisors. The activities of other affiliates do not materially impact the bank's capacity for community investment.

No financial or legal impediments hindered PBNA's ability to address community needs during the evaluation period. The last CRA evaluation was performed as of October 23, 2006 and resulted in an "Outstanding" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is October 23, 2006 through November 22, 2010. The start of the evaluation period corresponds to the date that the prior evaluation was performed. We analyzed home mortgage loan and small loans to business data for the calendar years 2006 through 2009. The review period for Community Development (CD) loans, qualified investments, and CD services is October 23, 2006 through November 22, 2010. Refer to appendix A for additional information.

Data Integrity

We tested the accuracy of public information filed by the bank for home mortgage loans and small loans to businesses and farms. We also reviewed CD loans, qualified investments, and CD services to ensure that they meet the regulatory definition of CD. We found the data to be substantially accurate, although some corrections to reported CD activities were needed. This evaluation is based on accurate information.

Selection of Areas for Full-Scope Review

The Huntington-Ashland, Parkersburg-Marietta, Ohio Non-MSA, and West Virginia Non-MSA assessment areas (AAs) were selected for full-scope reviews. These areas represent PBNA's major markets in each state that the bank operates in, and account for 96 percent of the bank's deposits, 93 percent of reported loans, and 89 percent of branches. These areas also represent the substantial majority of the population, owner-occupied housing units, and businesses within the bank's AAs in total. We assessed performance in the remaining two AAs through limited-scope procedures. Refer to the Scope of Evaluation section under each State and Multistate Metropolitan Area Rating section for details regarding how areas were selected for full-scope reviews. Also refer to appendix A for additional information regarding which areas received full-scope and limited-scope reviews.

PBNA closed its office in Grayson, Kentucky (Carter County) in 2008. As the bank no longer has a presence in Kentucky outside of the Huntington-Ashland multistate MSA, performance for the State of Kentucky is not being rated separately.

Ratings

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings. The Parkersburg-Marietta multistate metropolitan area and the State of Ohio received the most weight as they represent where the greatest degrees of PBNA's deposits, loans, and offices are located.

The multistate metropolitan area ratings and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

When drawing conclusions for the lending test in each AA, loan products were weighted according to their relative percentage of volume within that AA. This approach provided consideration to the bank's varied presence within the individual AAs.

Other

Our evaluation took into consideration information derived from members of the local communities. We contacted organizations that focus on providing or supporting community development activities, including affordable housing and social services to low- and moderate-income individuals. This is further discussed within the Market Profile section in appendix B.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Multistate Metropolitan Area Rating

Huntington-Ashland, WV-KY-OH MSA (26580)

CRA rating for the Huntington-Ashland, WV-KY-OH MSA)¹: **Satisfactory**

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: Outstanding

The major factors that support this rating include:

- The borrower distribution of loans is good in the Huntington-Ashland AA.
- The geographic distribution of loans is adequate in the Huntington-Ashland AA.
- Community development lending is excellent, and has a positive impact on the lending test for the Huntington-Ashland multistate MSA.
- The impact of qualified investment activity on the Huntington-Ashland AA is good.
- Offices are readily accessible to geographies and individuals of different income levels in the Huntington-Ashland AA.
- PBNA has a good record of participating in community development initiatives within the Huntington-Ashland AA.

Description of Institution's Operations in the Huntington-Ashland, WV-KY-OH MSA

PBNA has six offices within the Huntington-Ashland multistate MSA, offering its full range of residential, consumer, and commercial financial products and services. Offices are located in Cabell County in West Virginia, and Boyd and Greenup counties in Kentucky. With deposits of approximately \$125 million, this market represents approximately nine percent of the bank's deposits and eleven percent of reported loans. Please refer to the market profile in appendix C for detailed demographics and other performance context information for the assessment area the bank has within this MSA.

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

Scope of Evaluation in the Huntington-Ashland, WV-KY-OH MSA

PBNA has one AA within the Huntington-Ashland multistate MSA. Representing a portion of the MSA, the Huntington-Ashland AA is comprised of Cabell County in West Virginia, and Boyd County and Greenup County in Kentucky. Please refer to the market profile in appendix C for additional information.

We evaluated the bank's performance in the Huntington-Ashland AA using full-scope procedures, which is also the basis for our ratings of this area. In drawing conclusions relative to the bank's performance, we took into consideration information derived from members of the community. We met with a community development organization located in the area, as described in appendix C.

LENDING TEST

The bank's performance under the lending test in the Huntington-Ashland, WV-KY-OH MSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance within the Huntington-Ashland AA is good.

Lending Activity

Refer to Table 1 - Lending Volume for the "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the bank's lending activity.

PBNA's lending activity is adequate in the Huntington-Ashland AA. Lending is generally commensurate with the bank's share of the local deposit market, especially when considering the large number of lenders operating in the area. As described in the Market Profile section in appendix C, the majority of lenders operating in the AA do not have branches in the area or are not insured depository institutions.

June 30, 2010 FDIC deposit information reflects that PBNA ranks twelfth in deposits among depository institutions with a four percent share of the market. According to 2009 aggregate HMDA data, PBNA is ranked twenty-sixth in volume of originated/purchased home purchase loans with a one percent market share, sixteenth in home refinance lending with a two percent market share, and ninth in home improvement lending with a three percent market share. According to small business aggregate data for 2009, PBNA is ranked seventeenth in volume with a one percent share of the market.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is adequate in the Huntington-Ashland AA. This is based on performance from home purchase loans, home improvement loans, home refinance loans, and small loans to businesses. PBNA's lending activity for multifamily loans and small loans to farms is too small for meaningful analyses.

Home Mortgage Loans

The geographic distribution of home mortgage loans is adequate in the Huntington-Ashland AA. Refer to Tables 2, 3, 4, and 5 for the “Multistate Metropolitan Areas” in appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases. When drawing conclusions, we considered that there are limited opportunities for mortgage lending in low-income geographies, as there are few owner-occupied housing units located in those census tracts. Therefore, conclusions are based primarily on lending in moderate-income tracts. When drawing conclusions, individual loan products were weighted according to their relative percentage of volume within that AA.

The geographic distribution of home purchase loans is good in the Huntington-Ashland AA. The percentage of loans originated/purchased in moderate-income areas is near the percentage of owner-occupied housing units located in those neighborhoods. PBNA’s 2009 home purchase market share is too small for meaningful analyses.

The geographic distribution of home improvement loans is adequate. The percentage of loans originated/purchased in moderate-income areas is below the percentage of owner-occupied housing units located in those neighborhoods. While PBNA made no loans in moderate-income areas in 2009, market share information from prior years reflected stronger performance.

The geographic distribution of home refinance loans is poor. The percentage of loans in moderate-income areas is well below the percentage of owner-occupied housing units located in those areas. The bank’s 2009 market share of home refinance loans in moderate-income areas is somewhat lower than its overall home refinance market share, and is considered adequate.

Small Loans to Businesses

Refer to Table 6 for the “Multistate Metropolitan Areas” in appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. While the percentage of loans in low-income areas is well below the percentage of businesses located in those areas, the percentage of loans in moderate-income areas exceeds the demographic. PBNA’s 2009 small business market share is too small for meaningful analyses.

Lending Gap Analysis

We analyzed PBNA’s home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Inside/Outside Ratio

A significant portion of originated and purchased loans reported by PBNA during the evaluation period are within the bank's AAs. Overall, 84 percent of the number of loans and 72 percent of loan dollars are from the bank's AAs. Eighty-eight percent of the bank's home mortgage loans, 74 percent of small loans to businesses and farms, and 85 percent of CD loans are within the AAs. These calculations are done on a bank-wide basis. This record of AA lending was given positive consideration when drawing conclusions relative to the overall geographic distribution of lending performance for the bank as a whole.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is good in the Huntington-Ashland AA. This is based on performance from home mortgage lending and small loans to businesses. PBNA's lending activity for small loans to farms was too small for meaningful analyses.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good in the Huntington-Ashland AA. Refer to Tables 8, 9, and 10 for the "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the market profiles in appendix C for demographic information, including poverty rates.

The borrower distribution of home purchase loans is good in the Huntington-Ashland AA. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home purchase market share was too small in this AA for meaningful analysis.

The borrower distribution of home improvement loans is adequate. The percentage of loans to moderate-income borrowers is below the percentage of moderate-income families in the AA, but is considered adequate. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home improvement market share to low-income borrowers significantly exceeded its overall market share, but was well below that level for moderate-income borrowers.

The distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home refinance market share for low-income borrowers was near its overall home refinance market share in this AA, while its share of the moderate-income segment exceeded the overall share.

Small Loans to Businesses

Refer to Table 11 for "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses in the Huntington-Ashland AA is good. The percentage of loans to businesses with revenues of \$1 million or less is generally near the percentage of area businesses that have revenues of \$1 million or less. PBNA's market share of small loans to businesses is too small for meaningful analysis. The majority of small loans to businesses are for amounts \$100 thousand or less.

Community Development Lending

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

Community Development lending is excellent in the Huntington-Ashland AA, and has a positive impact on the bank's lending test rating for the Huntington-Ashland, WV-KY-OH MSA. PBNA made five loans totaling \$2.2 million during the evaluation period that positively impact the AA.

Two loans financed the purchase and renovation, and provided permanent financing, of a 92-unit mental health treatment center and additional units for long-term transitional housing. The facility will primarily serve low- and moderate-income individuals. A degree of complexity existed as multiple entities were involved. PBNA provided below-market-rate financing and a grant, and took a leadership role in arranging financing (including the sponsoring of a Federal Home Loan Bank grant). The project is also supported by state funds. As the organization serves several West Virginia counties including those located in both the Huntington-Ashland AA and the West Virginia Non-MSA AA, the loans are allocated between these two AAs based on the bank's presence in these markets. The allocation for this AA is \$1.27 million.

The bank partnered with community action organizations to fund three affordable housing projects. Three loans totaling \$940 thousand were made for affordable rental housing projects targeted to low- and moderate-income individuals. Two projects are for the construction of a total of 21 single-family homes, while the third project is for an 8-unit multifamily complex. All three projects are also supported by Ohio Housing Finance Authority Grants, linked deposits,

and a grant from the Finance Fund. While these three projects are located in adjacent Lawrence and Scioto counties, they are in close proximity to the bank's Huntington-Ashland offices and impact this AA.

Product Innovation and Flexibility

PBNA participates in several flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. The activity has a neutral impact on the lending test rating for the Huntington-Ashland, WV-KY-OH MSA.

My Community Mortgage loans are offered by PBNA. This is a flexible financing option through Fannie Mae that features low down payment options, low mortgage insurance requirements, and underwriting that includes credit history flexibility. The majority of loans made by PBNA under this program were to low- or moderate-income borrowers. During the evaluation period the bank made three loans to borrowers within this AA.

PBNA participated in the U.S. Department of Agriculture's Rural Housing Section 502 guaranteed loan program. This is a flexible financing option that features no down payment requirements. Loan proceeds can be used to construct, purchase, and rehabilitate single family homes. The majority of loans made by PBNA under this program were to low- or moderate-income borrowers. During the evaluation period the bank made seven loans to borrowers within this AA.

The bank also made two West Virginia Housing and one Federal Housing Association loans to low- or moderate-income borrowers. Furthermore, three low- and moderate-income borrowers were provided Federal Home Loan Bank Welcome Home Grants through PBNA for down payment and closing cost assistance.

INVESTMENT TEST

The bank's performance under the investment test in the Huntington-Ashland, WV-KY-OH MSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Huntington-Ashland AA is good. Refer to Table 14 for the "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the bank's level of qualified investments.

In drawing our conclusions on investment performance, we considered the impact of the investments on the AA, their level of complexity and responsiveness, the bank's capacity for investments, the high degree of competition in the area, and the limited opportunities available for investment in large projects. Refer to the AA's market profile in appendix C.

During the evaluation period the bank purchased \$1.1 million in local school bonds for communities adjacent to the AA. These investments have some impact to the bank's AA. A \$200 thousand prior period investment in a school bond within the AA continues to be outstanding as well. All of the bonds supported construction and improvement projects of schools and districts that primarily serve students from low- and moderate-income families and areas. In addition, grants totaling \$55 thousand to 27 community organizations for community development purposes were made through the bank and Peoples Bancorp Foundation, Inc.

While investments are responsive to local needs, they are not innovative or complex. At times PBNA has combined grants, CD loans and CD services to support initiatives in multiple ways.

SERVICE TEST

The bank's performance under the service test in the Huntington-Ashland, WV-KY-OH MSA is rated "Outstanding." Based on a full-scope review, the bank's performance in the Huntington-Ashland AA is excellent.

Retail Banking Services

Refer to Table 15 for "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

PBNA offices are readily accessible to geographies and individuals of different income levels in the AA. The bank operates six offices in the area. The percentage of offices located in moderate-income tracts exceeds the portion of the population living in those areas. While no offices are located in low-income census tracts, less than three percent of the AA's population resides within the area's three low-income tracts. During the evaluation period, PBNA opened one office located in a middle-income part of the AA, and closed no offices. Overall, the branch activity did not have a significant impact on the availability of PBNA products and services in the area.

Branch office hours and the level of services available do not vary in ways that inconvenience any portions of the bank's assessment areas, including the low- and moderate-income areas. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. Extended banking hours are also supplemented by Saturday hours. In addition, the Automated Teller Machine (ATM) network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. PBNA operates five full-service ATMs within the AA, and does not charge fees for accessing several off-site non-proprietary units, including some in low- and moderate-income neighborhoods.

Community Development Services

PBNA has a good record of participating in community development initiatives within its local communities. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, and programs for financing small businesses.

PBNA assisted a non-profit mental health organization obtain an affordable housing grant from the Federal Home Loan Bank of Cincinnati. By successfully sponsoring the grant application, providing financing (see discussion under the community development lending section), and providing a grant of its own, PBNA played a key role in a project to purchase and renovate a property for a mental health treatment center and long-term transitional housing. The facility

will primarily serve low- and moderate-income individuals in this AA as well as the West Virginia Non-MSA AA.

PBNA has also participated in the Federal Home Loan Bank's Welcome Home Program, which provides grants for home mortgage closing costs and down payments to low- and moderate-income families. As mentioned under the Lending Test's Product Innovation and Flexibility section, PBNA was awarded three grants for mortgage customers in this AA.

At times, officers and employees have used their financial expertise as members of director boards and leading project committees. Examples of roles that bank officers and employees have held and used their financial expertise are summarized below.

- A bank employee served as a board member and chairman of a local housing authority that administers affordable housing programs. In these capacities, he used his financial expertise for budget planning, program development, financial consulting, and investment consulting purposes.
- A bank loan officer has served on the board of a local community development company that makes loans to small businesses and provides training for start-up companies. The bank employee uses his lending expertise to help underwrite the loans.
- Several employees are involved with providing financial education to students of schools where a majority of students are from low- and moderate-income families. These efforts include school savings programs administered at two schools and a general banking program at another school.

Multistate Metropolitan Area Rating

Parkersburg-Marietta, WV-OH MSA (37620)

CRA rating for the Parkersburg-Marietta, WV-OH MSA²: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans is good in the Parkersburg-Marietta AA.
- The borrower distribution of loans is good in the Parkersburg-Marietta AA.
- Qualified investment activity in the Parkersburg-Marietta AA is adequate.
- Offices are readily accessible to geographies and individuals of different income levels in the Parkersburg-Marietta AA.
- PBNA has an excellent record of participating in community development initiatives within the Parkersburg-Marietta AA.

Description of Institution's Operations in the Parkersburg-Marietta, WV-OH MSA

PBNA has 12 offices within the Parkersburg-Marietta multistate MSA, offering its full range of residential, consumer, and commercial financial products and services. Offices are located in Wood County, West Virginia and Washington County, Ohio. This is one of the bank's primary market areas, and is where the bank is headquartered. With deposits of approximately \$692 million, this market represents approximately 49 percent of the bank's deposits and 40 percent of reported loans. Please refer to the market profile in appendix C for detailed demographics and other performance context information for the assessment area the bank has within this MSA.

Scope of Evaluation in the Parkersburg-Marietta, WV-OH MSA

PBNA has one AA within the Parkersburg-Marietta multistate MSA. Representing a portion of the MSA, the Parkersburg-Marietta AA is comprised of Wood County, West Virginia and

² This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Washington County, Ohio. Please refer to the market profile in appendix C for additional information.

We evaluated the bank's performance of this AA using full-scope procedures, which is also the basis for our ratings of this area. In drawing conclusions relative to the bank's performance, we took into consideration information derived from members of the community. We met with two community development organization located in the area, as described in appendix C.

LENDING TEST

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

Lending Activity

Refer to Table 1 - Lending Volume for the "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the bank's lending activity.

PBNA's lending activity is good in the Parkersburg-Marietta AA. Lending is commensurate with the bank's share of the local deposit market, especially when considering the large number of lenders operating in the area. As described in the Market Profile section in appendix C, the majority of lenders operating in the AA do not have branches in the area or are not insured depository institutions.

June 30, 2010 FDIC deposit information reflects that PBNA ranks first in deposits among depository institutions with a 26 percent share of the market. According to 2009 aggregate HMDA data, PBNA is the leading home mortgage lender in the AA. PNBA ranked second in volume of originated/purchased home purchase loans with a nine percent market share, first in home refinance lending with a fifteen percent market share, and fifth in home improvement lending with an eight percent market share. According to small business aggregate data for 2009, PBNA is ranked sixth in volume with a three percent market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is good in the Parkersburg-Marietta AA. This is based on performance from home purchase loans, home improvement loans, home refinance loans, and small loans to businesses. PBNA's lending activity for multifamily loans and small loans to farms is too small for meaningful analyses.

Home Mortgage Loans

The geographic distribution of home mortgage loans is adequate in the Parkersburg-Marietta AA. Refer to Tables 2, 3, 4, and 5 for the "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. With no low-income geographies in this AA, conclusions are

based primarily on lending in moderate-income tracts. When drawing conclusions, individual loan products were weighted according to their relative percentage of volume within the AA.

The geographic distribution of home purchase loans is good in the Parkersburg-Marietta AA. The percentage of loans originated/purchased in moderate-income areas is near the percentage of owner-occupied housing units located in those neighborhoods. While PBNA's 2009 home purchase market share in moderate-income areas was well below its overall home purchase market share in the area, market share performance in earlier years during the evaluation period reflected stronger performance.

The geographic distribution of home improvement loans is good. The percentage of loans originated/purchased in moderate-income areas is near the percentage of owner-occupied housing units located in those neighborhoods. PBNA's 2009 home improvement market share in moderate-income areas significantly exceeded its overall home improvement market share in the area.

The geographic distribution of home refinance loans is poor. The percentage of loans in moderate-income areas is well below the percentage of owner-occupied housing units located in those areas, and the bank's 2009 market share of loans in moderate-income areas is well below its overall home refinance market share for the AA.

Small Loans to Businesses

Refer to Table 6 for the "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The percentage of loans in moderate-income areas exceeds the percentage of businesses located in those areas, and the bank's 2009 market share of lending in moderate-income areas exceeded its overall 2009 small business market share in the Parkersburg-Marietta AA.

Lending Gap Analysis

We analyzed PBNA's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Inside/Outside Ratio

A significant portion of originated and purchased loans reported by PBNA during the evaluation period are within the bank's AAs. Overall, 84 percent of the number of loans and 72 percent of loan dollars are from the bank's AAs. Eighty-eight percent of the bank's home mortgage loans, 74 percent of small loans to businesses and farms, and 85 percent of CD loans are within the AAs. These calculations are done on a bank-wide basis. This record of AA lending was given positive consideration when drawing conclusions relative to the overall geographic distribution of lending performance for the bank as a whole.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is good in the Parkersburg-Marietta AA. This is based on performance from home purchase loans, home refinance loans, and small loans to businesses. PBNA's lending activity for small loans to farms was too small for meaningful analyses.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good in the Parkersburg-Marietta AA. Refer to Tables 8, 9, and 10 for the "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the market profiles in appendix C for demographic information, including poverty rates.

The borrower distribution of home purchase loans is excellent in the Parkersburg-Marietta AA. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is below the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home purchase market share in low-income areas exceeded its overall home purchase market share, and was near to its overall market share in moderate-income areas.

The borrower distribution of home improvement loans is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is below the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home improvement market share to low-income and moderate-income borrowers exceeded its overall home improvement market share for the AA.

The distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers is generally near the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home refinance market share to low-income and moderate-income borrowers exceeded its overall home refinance market share for the AA.

Small Loans to Businesses

Refer to Table 11 for “Multistate Metropolitan Areas” in appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses in the Parkersburg-Marietta AA is good. The percentage of loans to businesses with revenues of \$1 million or less is generally near the percentage of area businesses that have revenues of \$1 million or less. PBNA’s market share of this segment of the market significantly exceeded its overall share of small business lending in 2009. The majority of small loans to businesses are for amounts \$100 thousand or less.

Community Development Lending

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

PBNA made nine CD loans totaling \$923 thousand within the Parkersburg-Marietta AA during the evaluation period. Considering the size of the AA, this level of activity has a neutral impact on the lending test rating for the Parkersburg-Marietta, WV-OH MSA. The bank’s CD lending activity is summarized below:

- As part of a state-sponsored economic development job creation program, a \$514 thousand loan was made to a municipality located in a moderate-income area for energy conservation related improvements. A degree of complexity was involved, as the loan was made in conjunction with a state-sponsored linked-deposit program that provided for a reduced interest rate.
- A \$200 thousand operating line of credit was made to a non-profit organization that primarily serves low- and moderate-income individuals who are disabled or mentally impaired.
- Seven loans totaling \$209 thousand were made to local non-profit community organizations that focus on providing social services to low- and moderate-income individuals. Three loans provided temporary financing while an organization waited receipt of grant funds. Three loans were for building repairs and equipment needed to sustain an organization’s initiatives. One loan financed a bus for a local Head Start program.

Product Innovation and Flexibility

PBNA participates in several flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Considering the size of the AA and volume of overall lending performed, the activity under flexible programs has a neutral impact on the lending test rating for the Parkersburg-Marietta, WV-OH MSA.

My Community Mortgage loans are offered by PBNA. This is a flexible financing option through Fannie Mae that features low down payment options, low mortgage insurance requirements, and underwriting that includes credit history flexibility. The majority of loans made by PBNA under this program were to low- or moderate-income borrowers. During the evaluation period the bank made 19 My Community Mortgage loans to borrowers within this AA.

PBNA participated in the U.S. Department of Agriculture's Rural Housing Section 502 guaranteed loan program. This is a flexible financing option that features no down payment requirements, where loan proceeds can be used to construct, purchase, and rehabilitate single family homes. The majority of loans made by PBNA under this program were to low- or moderate-income borrowers. During the evaluation period the bank made 37 loans to borrowers within this AA.

Loans were made through Ohio Housing Finance Authority's First Time Homebuyer and Target Area Loan programs. These programs feature flexible financing that include below-market interest rates and low fees loans. More than half of the loans made by PBNA under these programs were to low- or moderate-income borrowers or to borrowers located in low- or moderate-income areas. During the evaluation period, the bank made 22 loans under these programs to borrowers within this AA.

The bank also made several West Virginia Housing and Federal Housing Association loans to low- or moderate-income borrowers. Furthermore, 15 low- and moderate-income borrowers were provided Federal Home Loan Bank Welcome Home Grants through PBNA for down payment and closing cost assistance.

INVESTMENT TEST

The bank's performance under the investment test in Parkersburg-Marietta, WV-OH MSA is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Parkersburg-Marietta AA is adequate. Refer to Table 14 for the "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the bank's level of qualified investments.

In drawing our conclusions on investment performance, we considered the impact of the investments on the AA, their level of complexity and responsiveness, the bank's capacity for investments, the high degree of competition in the area, and the limited opportunities available for investment in large projects. Refer to the AA's market profile in appendix C.

PBNA's qualified investments in this AA are comprised of an investment in a new markets tax credit facility, and grants provided by the bank and Peoples Bancorp Foundation, Inc. to local organizations to support CD initiatives within the bank's AAs. While Peoples investments are responsive to local needs, they are not innovative or complex.

Peoples Capital Corporation made a \$1 million investment in the Ohio Finance Fund, which has the potential to positively impact the bank's AAs located in Ohio through various development projects in low-income communities that qualify for new markets tax credits. This investment is reflected as a statewide investment on Table 14 for the State of Ohio. The portion of the investment funded during this evaluation period is reflected as a current period investment. For evaluation purposes, we allocated the investment to the AAs based on estimated potential impact and the projects currently being supported by the Fund. \$460 thousand is allocated to this AA. While there is potential for this investment to impact the Parkersburg-Marietta AA, no projects have been identified to date.

Grants totaling \$181 thousand to 41 community organizations for community development purposes were made through the bank and Peoples Bancorp Foundation, Inc. At times PBNA has combined grants, CD loans and CD services to support initiatives in multiple ways.

SERVICE TEST

The bank's performance under the service test in the Parkersburg-Marietta, WV-OH MSA is rated "Outstanding." Based on a full-scope review, the bank's performance in the Parkersburg-Marietta AA is excellent.

Retail Banking Services

Refer to Table 15 for "Multistate Metropolitan Areas" in appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

PBNA's branches are readily accessible to geographies and individuals of different income levels in the AA. The bank operates 12 offices in the area. The percentage of offices located in moderate-income tracts significantly exceeds the portion of the population living in those areas. No portions of the AA are defined as being low-income. During the evaluation period, PBNA closed one office located in a middle-income part of the AA. No offices were opened. Overall, the branch activity did not have a significant impact on the availability of PBNA products and services in the area.

Branch office hours and the level of services available do not vary in ways that inconvenience any portions of the bank's assessment areas, including moderate-income areas. Office hours and services provided in the AA are comparable among all locations regardless of the income level of the geography where the offices are located. Extended banking hours are also supplemented by Saturday hours, and Sunday hours are available at offices located within retail store locations. In addition, the Automated Teller Machine (ATM) network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. PBNA operates six full-service ATMs within the AA, and does not charge fees

for accessing several off-site non-proprietary units, including some in moderate-income neighborhoods.

Community Development Services

PBNA has an excellent record of participating in community development initiatives within its local communities. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, and financial education programs.

In two instances, PNBA assisted non-profit organizations obtain American Dream Homeownership Challenge grants from the Federal Home Loan Bank of Cincinnati (FHLB). One project provided home ownership opportunities for three low- and moderate-income persons with mental disabilities. The second project was for the construction of three homes for low- and moderate-income individuals.

The bank partnered with a local service organization to provide affordable housing to a low- or moderate-income homebuyer. The donated home was renovated, in part using no-cost bank financing. A bank employee chaired the family selection committee.

PBNA has also participated in the FHLB's Welcome Home Program, which provides grants for home mortgage closing costs and down payments to low- and moderate-income families. As mentioned under the Lending Test's Product Innovation and Flexibility section, PBNA was awarded 15 grants for mortgage customers in this AA.

Officers and employees often used their financial expertise to support CD initiatives, including acting in leadership roles on boards of directors and project committees. Examples of roles that bank officers and employees have held and used their financial expertise are:

- A senior officer served as vice chairman for a regional port authority, using his financial expertise to assist with economic development project planning, compliance with regulations, and providing consultation on economic issues.
- A senior officer served as a member of a scholarship committee for an organization providing college scholarships to low- and moderate-income students. Using her financial expertise, she helped to evaluate the income qualifications of applicants.
- A bank loan officer has served on the board of a local community development company that makes loans to small businesses and provides training for start-up companies. The officer uses his lending expertise to help underwrite the loans.
- Many employees are involved with providing financial education to low- and moderate-income individuals and students under a variety of initiatives. Examples include holding bank information clinics at local food banks; banking education sessions; savings account training through a community action financial literacy program; homebuyer education seminars with a community action agency; participating in a math and banking financial counseling program through a family learning center; and presentations on real estate loans and welcome home grants.

State Rating

State of Ohio

CRA Rating for Ohio³: **Satisfactory**
 The lending test is rated: High Satisfactory
 The investment test is rated: High Satisfactory
 The service test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans is excellent in the Ohio Non-MSA AA.
- The borrower distribution of loans is good in the Ohio Non-MSA AA.
- Qualified investment activity in the Ohio Non-MSA AA is good.
- Offices are readily accessible to geographies and individuals of different income levels in the Ohio Non-MSA AA.
- PBNA has an excellent record of participating in community development initiatives within the Ohio Non-MSA AA.

Description of Institution's Operations in Ohio

PBNA offers its full range of residential, consumer, and commercial financial products and services through 21 offices serving portions of south-east and central Ohio. With deposits of approximately \$445 million, this is one of the bank's primary rating areas. Approximately 31 percent of the bank's deposits and 43 percent of reported loans are from Ohio.

PBNA has three AAs in Ohio. The AAs consist of the Fairfield County portion of the Columbus MSA (Fairfield); a portion of Belmont County within the Wheeling, West Virginia-Ohio multistate MSA (Belmont); and a contiguous area not located in any MSA comprised of Athens, Gallia, Guernsey, Meigs, Morgan, Muskingum and Noble counties, plus a portion of Hocking County (Ohio Non-MSA). Please refer to the market profile in appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in Ohio

The Ohio Non-MSA AA was selected for a full-scope review. This AA represents PBNA's major market in Ohio and accounts for approximately 87 percent of its Ohio deposits and 83 percent of reported Ohio loans for the evaluation period. Limited-scope reviews were performed for the Fairfield and Belmont AAs. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

Ohio ratings are based primarily on conclusions reached for PBNA's performance in the Ohio Non-MSA AA where we used full-scope procedures. In drawing conclusions relative to the bank's performance, we took into consideration information derived from members of the community. We met with three community development organization located in the full-scope area, as described in appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the State of Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Ohio Non-MSA AA is good.

Lending Activity

Refer to Table 1 - Lending Volume for the State of Ohio in appendix D for the facts and data used to evaluate the bank's lending activity.

PBNA's lending activity is good in the Ohio Non-MSA AA. Lending is commensurate with the bank's share of the local deposit market, especially when considering the large number of lenders operating in the area. As described in the Market Profile section in appendix C, the majority of lenders operating in the AA do not have branches in the area or are not insured depository institutions.

June 30, 2010 FDIC deposit information reflects that PBNA ranks third in terms of deposits among depository institutions with a ten percent share of the market. According to 2009 aggregate HMDA data, PBNA is one of the top four home mortgage lenders in the AA. PBNA is ranked sixth in volume of originated/purchased home purchase loans with a five percent market share, fourth in home mortgage refinance loans with a six percent market share, and second in home improvement loans with a fourteen percent market share. According to small business aggregate data for 2009, PBNA is ranked ninth in volume with a two percent market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent in the Ohio Non-MSA AA. This is based on performance from home purchase loans, home improvement loans, home refinance loans, and small loans to businesses. PBNA's lending activity for multifamily loans and small loans to farms activity was too small for meaningful analyses.

Middle-income tracts comprise nearly 60 percent of all geographies, and all were designated as distressed and/or underserved during at least a portion of the evaluation period. This was given consideration when assessing the geographic distribution of loans.

Home Mortgage Loans

The geographic distribution of home mortgage loans is excellent in the Ohio Non-MSA AA. Refer to Tables 2, 3, 4, and 5 for the “State of Ohio” in appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases. When drawing conclusions, we considered that there are limited opportunities for mortgage lending in low-income geographies, as there are very few owner-occupied housing units located in those census tracts. Therefore, conclusions are based primarily on lending in moderate-income tracts. When drawing conclusions, individual loan products were weighted according to their relative percentage of volume within that AA.

The geographic distribution of home purchase loans is excellent in the Ohio Non-MSA AA. The percentage of loans originated/purchased in moderate-income areas significantly exceeds the percentage of owner-occupied housing units located in those neighborhoods. PBNA’s 2009 home purchase market share in moderate-income areas significantly exceeded its overall home purchase market share in the area.

The geographic distribution of home improvement loans is excellent in the Ohio Non-MSA AA. The percentage of loans originated/purchased in moderate-income areas significantly exceeds the percentage of owner-occupied housing units located in those neighborhoods. While PBNA’s 2009 home purchase market share in moderate-income areas was well below its overall home improvement market share in the area, market share performance during other years in the evaluation period reflected strong performance.

The distribution of home refinance loans is excellent. The percentage of loans in moderate-income areas exceeds the percentage of owner-occupied housing units located in those areas, and the bank’s 2009 market share of loans in moderate-income areas significantly exceeded its overall home refinance market share for the AA.

Small Loans to Businesses

Refer to Table 6 for the State of Ohio in appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The percentage of loans in moderate-income areas exceeds the percentage of businesses located in those areas, and the bank’s 2009 market share of lending in moderate-income areas significantly exceeded its overall 2009 small business market share in the AA. The percentage of loans in low-income areas was somewhat near the percentage of businesses located in those areas, and PBNA’s 2009 market share significantly exceeded the banks overall small business market share.

Lending Gap Analysis

We analyzed PBNA's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Inside/Outside Ratio

A significant portion of originated and purchased loans reported by PBNA during the evaluation period are within the bank's AAs. Overall, 84 percent of the number of loans and 72 percent of loan dollars are from the bank's AAs. Eighty-eight percent of the bank's home mortgage loans, 74 percent of small loans to businesses and farms, and 85 percent of CD loans are within the AAs. These calculations are done on a bank-wide basis. This record of AA lending was given positive consideration when drawing conclusions relative to the overall geographic distribution of lending performance for the bank as a whole.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is good in the Ohio Non-MSA AA. This is based on performance from home purchase loans, home refinance loans, and small loans to businesses. PBNA's lending activity for small loans to farms was too small for meaningful analyses.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good in the Ohio Non-MSA AA. Refer to Tables 8, 9, and 10 for the State of Ohio in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the market profiles in appendix C for demographic information, including poverty rates.

The borrower distribution of home purchase loans is good in the Ohio Non-MSA AA. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home purchase market share in moderate-income areas exceeded its overall home purchase market share, and was below its overall market share in low-income areas.

The borrower distribution of home improvement loans is excellent. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is below the percentage of low-income

families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home improvement market shares to low-income and moderate-income borrowers are below its overall home improvement market share in 2009.

The distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the AA, performance is adequate considering the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home refinance market share to moderate-income individuals exceeded its overall home refinance market share, and was near the overall level to low-income borrowers.

Small Loans to Businesses

Refer to Table 11 for State of Ohio in appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses in the Ohio Non-MSA AA is excellent. The percentage of loans to businesses with revenues of \$1 million or less exceeds the percentage of area businesses that have revenues of \$1 million or less. PBNA's market share of this segment of the market significantly exceeded its overall share of small business lending in 2009. A high majority of small loans to businesses are for amounts \$100 thousand or less.

Community Development Lending

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

PBNA made three CD loans totaling \$197 thousand within the Ohio Non-MSA AA during the evaluation period. Considering the size of the AA, this level of activity has a neutral impact on the lending test rating for the State of Ohio.

One loan was to a non-profit organization to renovate a group home in a moderate-income area for children with mental health needs. One loan was made to a coalition of community action agencies that primarily provides social services to low-income individuals. One loan was to a public safety organization serving a middle-income area that is designated as both distressed and underserved.

Product Innovation and Flexibility

PBNA participates in several flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. Considering the size of the AA and volume of overall lending performed, the activity under flexible programs has a neutral impact on the lending test rating for the State of Ohio.

My Community Mortgage loans are offered by PBNA. This is a flexible financing option through Fannie Mae that features low down payment options, low mortgage insurance requirements, and underwriting that includes credit history flexibility. The majority of loans made by PBNA under this program were to low- or moderate-income borrowers. During the evaluation period the bank made 34 loans to borrowers within this AA.

PBNA participated in the U.S. Department of Agriculture's Rural Housing Section 502 guaranteed loan program. This is a flexible financing option that features no down payment requirements, where loan proceeds can be used to construct, purchase, and rehabilitate single family homes. The majority of loans made by PBNA under this program were to low- or moderate-income borrowers. During the evaluation period the bank made 36 loans to borrowers within this AA.

Loans were made through Ohio Housing Finance Authority's First Time Homebuyer and Target Area Loan programs. These programs feature flexible financing that include below-market interest rates and low fees loans. More than half of the loans made by PBNA under these programs were to low- or moderate-income borrowers or to borrowers located in low- or moderate-income areas. During the evaluation period, the bank made ten loans under these programs to borrowers within this AA.

Furthermore, 14 low- and moderate-income borrowers were provided Federal Home Loan Bank Welcome Home Grants through PBNA for down payment and closing cost assistance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Belmont AA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in the State of Ohio. In the Fairfield AA the bank's performance is weaker than the bank's overall performance in the state, as reflected by the geographic and borrower distribution records in that AA. Due to the relative size of the area, the weaker performance in the Fairfield AA did not materially impact our overall lending test conclusions for Ohio. Refer to the Tables 1 through 12 for the State of Ohio in 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 Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Ohio Non-MSA AA is good. Refer to Table 14 for the State of Ohio in appendix D for the facts and data used to evaluate the bank's level of qualified investments.

In drawing our conclusions on investment performance, we considered the impact of the investments on the AA, their level of complexity and responsiveness, the bank's capacity for investments, the high degree of competition in the area, and the limited opportunities available for investment in large projects. Refer to the AA's market profile in appendix C.

PBNA's qualified investments are comprised of investments in low-income housing tax credit facilities; a new markets tax credit facility, bonds supporting construction and improvement projects of school districts that primarily serve students from low- and moderate-income families and areas, and grants provided by the bank and Peoples Bancorp Foundation, Inc. to local organizations to support CD initiatives within the bank's AAs.

Peoples Capital Corporation made a \$1 million investment in the Ohio Finance Fund, which has the potential to positively impact the bank's AAs located in Ohio through various economic development projects that qualify for new markets tax credits. This investment is reflected as a statewide investment on Table 14 for the State of Ohio. The \$600 thousand portion of the investment funded during this evaluation period is reflected as a current period investment. The \$400 thousand portion previously funded is reflected as a prior period investment. For evaluation purposes, we allocated the investment to the AAs based on estimated potential impact and the projects currently being supported by the Fund. \$500 thousand is allocated to this AA. One project supported by the Fund is located within this AA.

During a prior evaluation period Peoples Capital Corporation invested in two Ohio Equity Fund Limited Partnership program funds administered by the Ohio Capital Corporation for Housing. Funds are used to construct and rehabilitate affordable housing rental units throughout Ohio, including the bank's AAs. These investments allow the bank to take advantage of low-income housing tax credits (LIHTC). With a current book value of \$340 thousand, these investments are reflected as prior period statewide investments on Table 14 for the State of Ohio. During the evaluation period Peoples continued to fund the commitments. For evaluation purposes, we allocated the investments to the AAs based on the location of the projects supported by the Fund. \$170 thousand is allocated to this AA. One project supported by one of the Funds is located within this AA.

During a prior evaluation period the bank purchased \$525 thousand of local school bonds that continue to be outstanding. The bonds supported construction and improvement projects of schools and districts that primarily serve students from low- and moderate-income families and areas within the AA.

Grants totaling \$193 thousand to 59 community organizations for community development purposes were made by the bank and Peoples Bancorp Foundation, Inc. At times PBNA has combined grants, CD loans and CD services to support initiatives in multiple ways.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Belmont AA is not inconsistent with the bank's overall "high satisfactory" performance under the investment test in Ohio. In the Fairfield AA, the bank's performance is weaker than the bank's overall performance in the state, based on investment volume relative to the bank's presence in that area. The weaker performance in the Fairfield AA did not materially impact our overall conclusions for the investment test in Ohio. Refer to the Table 14 for the State of Ohio in 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 Ohio is rated "Outstanding." Based on a full-scope review, the bank's performance in the Ohio Non-MSA AA is excellent.

Retail Banking Services

Refer to Table 15 for the State of Ohio in appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

PBNA's branches are readily accessible to geographies and individuals of different income levels in the AA. The bank operates 16 offices in the area. The percentage of offices located in moderate-income tracts significantly exceeds the portion of the population living in those areas. While no offices are located in the AA's low-income census tract, less than one percent of the AA's population resides in low-income areas. During the evaluation period, PBNA closed three and opened two offices, all within moderate-income areas. Overall, the branch activity did not have a significant impact on the availability of PBNA products and services in the area.

Branch office hours and the level of services available do not vary in ways that inconvenience any portions of the bank's assessment areas, including the low- and moderate-income areas. Office hours and services provided in the AA are comparable among locations regardless of the income level of the geography where the offices are located. Extended banking hours are also supplemented by Saturday hours at the majority of the banking facilities located in the AA, including those located in the moderate-income areas. In addition, the Automated Teller Machine (ATM) network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. PBNA operates seven full-service and eight cash-dispensing ATMs within the AA, and does not charge fees for accessing several off-site non-proprietary units, including some moderate-income neighborhoods.

Community Development Services

PBNA has an excellent record of participating in community development initiatives within its local communities. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financing small businesses, and financial education programs.

PBNA assisted a non-profit organization to obtain an American Dream Homeownership Challenge grant from the Federal Home Loan Bank of Cincinnati (FHLB). The project provided home ownership opportunities for low- and moderate-income persons with mental disabilities.

PBNA has also participated in the FHLB's Welcome Home Program, which provides grants for home mortgage closing costs and down payments to low- and moderate-income families. As mentioned under the Lending Test's 'Product Innovation and Flexibility' section, PBNA was awarded fourteen grants for low- and moderate-income mortgage customers in this AA during the evaluation period.

Officers and employees often used their financial expertise to support CD initiatives, including acting in leadership roles on boards of directors and project committees. Examples of roles that bank officers and employees have held and used their financial expertise are summarized below.

- A bank officer serves as an underwriter for the local port authority's loan committee where loans are underwritten for start-up small businesses. Similarly, a senior officer chairs a revolving loan fund for another organization where small business and start-up business loans are underwritten.
- A bank officer has served as a board member to an organization providing social services to low- and moderate-income individuals. She uses her financial expertise to help find sources of funding for training programs and planning youth programs.
- A bank employee serves on a grant committee of a local charitable organization. Another employee assists with budget planning for a county health program serving primarily low- and moderate-income people. A third employee serves on a local downtown economic corporation committee.
- Many employees are involved with providing financial education to low- and moderate-income individuals and students under a variety of initiatives. A few examples include 'how to do your banking' programs at a local food bank; budgeting and homeowner counseling sessions through the local community action agency and housing authority; identification theft and fraud prevention sessions; various banking and savings programs at several schools where students primarily come from low- and moderate-income families; a financial planning seminar for low- and moderate-income senior citizens; and homebuyer education classes through community action organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Fairfield AA is not inconsistent with the bank's overall "Outstanding" performance under the service test in Ohio. In the Belmont AA the bank's performance is weaker than the bank's overall performance in the state as the bank's office is reasonably accessible to geographies and individuals of different income levels. The weaker performance in the Belmont AA did not materially impact our overall service test conclusions for Ohio. Refer to Table 15 for the State of Ohio in appendix D for the facts and data that support these conclusions.

State Rating

State of West Virginia

CRA Rating for West Virginia⁴:	<u>Satisfactory</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Low Satisfactory</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- The borrower distribution of loans is good in the West Virginia Non-MSA AA. As there are no low- or moderate-income areas within this AA, geographic distribution analyses are less meaningful.
- Community development lending is excellent in the West Virginia Non-MSA. While a positive factor, CD activity does not raise the West Virginia lending test rating further.
- Qualified investment activity in the West Virginia Non-MSA AA is good.
- Offices are accessible to essentially all geographies and individuals of different income levels in the West Virginia Non-MSA AA.
- PBNA has a good record of participating in community development initiatives within the West Virginia Non-MSA AA.

Description of Institution's Operations in West Virginia

PBNA offers its full range of residential, consumer, and commercial financial products and services through five offices located in western West Virginia's Mason and Wetzel counties. With deposits of approximately \$162 million, this market represents approximately eleven percent of the bank's deposits and six percent of reported loans. Please refer to the market profile in appendix C for detailed demographics and other performance context information for the assessment area the bank has within this MSA.

⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in West Virginia

PBNA has one AA in West Virginia. Not located in any MSA, the AA is comprised of Mason and Wetzel counties. Please refer to the market profile in appendix C for additional information.

We evaluated the bank's performance using full-scope procedures for the West Virginia Non-MSA AA, which is also the basis for our ratings for the State. In drawing conclusions relative to the bank's performance, we took into consideration information derived from members of the community. We met with a community development organization located in the area, as described in appendix C.

LENDING TEST

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

Lending Activity

Refer to Table 1 - Lending Volume for the State of West Virginia in appendix D for the facts and data used to evaluate the bank's lending activity.

PBNA's lending activity is adequate in the West Virginia Non-MSA AA. Lending is generally commensurate with the bank's share of the local deposit market, especially when considering the large number of lenders operating in the area. As described in the Market Profile section in appendix C, the majority of lenders operating in the AA do not have branches in the area or are not insured depository institutions.

June 30, 2010 FDIC deposit information reflects that PBNA ranks first in terms of deposits among depository institutions with a 28 percent share of the market. According to 2009 aggregate HMDA data, PBNA is one of the three top home mortgage lenders in the AA. PBNA is ranked third in volume of originated/purchased home purchase loans with a seven percent market share, third for home refinance loans with an eleven percent market share, and eighth in home improvement lending with a two percent market share. According to small business aggregate data for 2009, PBNA is ranked eighth in volume with a three percent market share.

Distribution of Loans by Income Level of the Geography

The West Virginia Non-MSA AA is comprised primarily of middle-income census tracts, all of which were designated as distressed areas for a majority of the evaluation period. There are no low- or moderate-income geographies within the AA. Therefore, the ability to conduct meaningful geographic distribution analyses using demographic data is limited.

Lending Gap Analysis

We analyzed PBNA's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Inside/Outside Ratio

A significant portion of originated and purchased loans reported by PBNA during the evaluation period are within the bank's AAs. Overall, 84 percent of the number of loans and 72 percent of loan dollars are from the bank's AAs. Eighty-eight percent of the bank's home mortgage loans, 74 percent of small loans to businesses and farms, and 85 percent of CD loans are within the AAs. These calculations are done on a bank-wide basis. This record of AA lending was given positive consideration when drawing conclusions relative to the overall geographic distribution of lending performance for the bank as a whole.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is good in the West Virginia Non-MSA AA. This is based on performance from home purchase loans, home refinance loans, and small loans to businesses. PBNA's lending activity for small loans to farms was too small for meaningful analyses.

Home Mortgage Loans

The borrower distribution of home mortgage loans is good in the West Virginia Non-MSA AA. Refer to Tables 8, 9, and 10 for the State of West Virginia in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the market profiles in appendix C for demographic information, including poverty rates.

The borrower distribution of home purchase loans is good in the West Virginia Non-MSA AA. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home purchase market shares to low-income individuals and moderate-income individuals also exceeded the bank's overall home purchase market share in the AA.

The borrower distribution of home improvement loans is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families

in the AA. While the percentage of loans to low-income borrowers is below the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. While PBNA made no home improvement loans to low-income or moderate-income borrowers in 2009, market shares in other years of the evaluation period reflected stronger performance.

The distribution of home refinance loans is good. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is well below the percentage of low-income families in the AA, performance is adequate considering the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community. PBNA's 2009 home refinance market shares to moderate-income borrowers exceeded the bank's overall home refinance market share. The 2009 market share for low-income borrowers was below the overall share of the home refinance market in the AA.

Small Loans to Businesses

Refer to Table 11 for State of West Virginia in appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses in the West Virginia Non-MSA AA is excellent. The percentage of loans to businesses with revenues of \$1 million or less significantly exceeds the percentage of area businesses that have revenues of \$1 million or less. PBNA's market share of this segment of the market significantly exceeded its overall share of small business lending in 2009. A high majority of small loans to businesses are for amounts \$100 thousand or less.

Community Development Lending

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

Community Development lending is excellent in the West Virginia Non-MSA AA. While this is a positive factor, the CD lending activity was not sufficient to raise the West Virginia lending test rating above the "High Satisfactory" level. PBNA made three loans totaling \$1.7 million during the evaluation period that positively impact the AA.

Two loans financed the purchase, renovation, and provided permanent financing of a 92-unit mental health treatment center plus additional units for long-term transitional housing. The facility will primarily serve low- and moderate-income individuals. A degree of complexity existed as multiple entities were involved. PBNA provided below market rate financing, a grant, and took a leadership role in arranging financing, including the sponsoring of a Federal Home Loan Bank grant. The project is also supported by state funds. As the organization serves several West Virginia counties including those located in both the Huntington-Ashland

AA and the West Virginia Non-MSA AA, the loans are allocated between these two AAs based on the bank's presence in these markets. The allocation for this AA is \$1.65 million.

One \$50 thousand loan was made to a non-profit organization for economic development initiatives in a distressed middle-income downtown area.

Product Innovation and Flexibility

PBNA participates in several flexible lending programs to address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. The activity under flexible programs has a neutral impact on the lending test rating for the State of West Virginia.

My Community Mortgage loans are offered by PBNA. This is a flexible financing option through Fannie Mae that features low down payment options, low mortgage insurance requirements, and underwriting that includes credit history flexibility. The majority of loans made by PBNA under this program were to low- or moderate-income borrowers. During the evaluation period the bank made seven loans to borrowers within this AA. Furthermore, one low- or moderate-income borrower was provided a Federal Home Loan Bank Welcome Home Grant through PBNA for down payment and closing cost assistance.

INVESTMENT TEST

The bank's performance under the investment test in West Virginia is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the West Virginia Non-MSA AA is adequate. Refer to Table 14 for West Virginia in appendix D for the facts and data used to evaluate the bank's level of qualified investments.

In drawing our conclusions on investment performance, we considered the impact of the investments on the AA, their level of complexity and responsiveness, the bank's capacity for investments, the high degree of competition in the area, and the limited opportunities available for investment in large projects. Refer to the AA's market profile in appendix C.

During the evaluation period, grants totaling \$33 thousand to 23 community organizations for community development purposes were made through the bank and Peoples Bancorp Foundation, Inc. At times PBNA has combined grants, CD loans and CD services to support initiatives in multiple ways. In addition, a \$25 thousand investment in a local school bond made during a prior evaluation period continues to be outstanding. The bond supported school building renovations and additions serving a school district where a majority of students are from low- and moderate-income families. While these investments are responsive to community needs, they are not innovative or complex.

SERVICE TEST

The bank's performance under the service test in West Virginia is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the West Virginia Non-MSA AA is good.

Retail Banking Services

Refer to Table 15 for the State of West Virginia in appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

PBNA's branches are accessible to essentially all geographies and individuals of different income levels in the AA. The bank operates five offices in the area. There are no low- or moderate-income areas within this AA. Office distribution between middle and upper income tracts is consistent with the population. No offices were opened or closed within this area during the evaluation period.

Branch office hours and the level of services available through do not vary in ways that inconvenience any portions of the bank's assessment areas, including the low- and moderate-income populations. Office hours and services provided in the AA are generally comparable among various locations. Extended banking hours are also supplemented by Saturday hours at all locations, and one located within a retail store has Sunday hours. In addition, the Automated Teller Machine (ATM) network is an alternative delivery system that allows customers to access their accounts outside of regular banking hours. PBNA operates four full-service ATMs within the AA, and does not charge fees for accessing several off-site non-proprietary units, including some in moderate-income neighborhoods.

Community Development Services

PBNA has a good record of participating in community development initiatives within its local communities, especially given the limited opportunities. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, and programs for financing small businesses.

PBNA assisted a non-profit mental health organization obtain an affordable housing grant from the Federal Home Loan Bank of Cincinnati. By successfully sponsoring the grant application, providing financing (see discussion under the community development lending section), and providing a grant of its own, PBNA played a key role in a project to purchase and renovate a property for a mental health treatment center and long-term transitional housing. The facility will primarily serve low- and moderate-income individuals in this AA as well as the Ashland-Huntington AA.

PBNA has also participated in the FHLB's Welcome Home Program, which provides grants for home mortgage closing costs and down payments to low- and moderate-income families. As mentioned under the Lending Test's 'Product Innovation and Flexibility' section, PBNA was awarded a grant for a mortgage customer in this AA during the evaluation period.

At times, officers and employees have used their financial expertise as members of director boards and leading project committees. For instance, an employee is on the board of directors of a local economic development organization. Other employees conducted banking and other financial education sessions for a county family services organization. An employee is a board member of a family services organization serving low- and moderate-income children and families in the area.

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 (excludes CD loans): 01/01/2006 to 12/31/2009 Investment and Service Tests and CD Loans: 10/23/2006 to 11/22/2010	
Financial Institution		Products Reviewed
Peoples Bank, N.A. (PBNA) Marietta, Ohio		Home mortgage loans, small loans to businesses, community development loans, qualified investments, community development services.
Affiliates	Affiliate Relationship	Products Reviewed
Peoples Capital Corporation	Holding company subsidiary	Public welfare investments
Peoples Bancorp Foundation	Bank funded	Qualified grants
Peoples Financial Advisors	Bank Division	Community development services
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
<u>Multistate MSAs</u> Huntington-Ashland (MSA 26580) Parkersburg-Marietta (MSA 37620)	Full Scope Full Scope	None
<u>State of Ohio</u> Ohio Non-MSA Belmont County (Non-MSA) Fairfield County (MSA 18140)	Full Scope Limited Scope Limited Scope	
<u>State of West Virginia</u> West Virginia Non-MSA	Full Scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS Peoples Bank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Peoples Bank, N.A.	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Multistate Metropolitan Area or State:				
Huntington-Ashland (MSA 26580)	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Parkersburg-Marietta (MSA 37620)	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
State of Ohio	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
State of West Virginia	High Satisfactory	Low Satisfactory	High 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

Huntington-Ashland, WV-KY-OH MSA (26580)

Demographic Information for Full-Scope Area: Huntington-Ashland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	49	6.12	20.41	42.86	30.61	0.00
Population by Geography	183,427	2.96	14.10	48.18	34.76	0.00
Owner-Occupied Housing by Geography	53,071	0.19	10.72	51.98	37.11	0.00
Businesses by Geography	13,065	8.57	13.03	44.59	33.80	0.00
Farms by Geography	251	1.20	8.37	56.18	34.26	0.00
Family Distribution by Income Level	51,173	20.57	16.44	20.32	42.67	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	18,938	1.12	20.26	52.70	25.92	0.00
Median Family Income		= \$37,119		Median Housing Value		= 68,404
HUD Adjusted Median Family Income for 2009		= \$48,000		Unemployment Rate		= 8.3%
Households Below the Poverty Level		= 18%		(October 2010 unadjusted)		

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2009 HUD updated MFI.

The Huntington-Ashland AA is comprised of Cabell County in West Virginia, and Boyd County and Greenup County in Kentucky. These counties represent the portion of the Huntington-Ashland, WV-KY-OH Multistate MSA (26580) where the bank has branch offices. The full MSA is not included as the bank does not have offices in Lawrence County, Ohio or Wayne County, West Virginia. Approximately nine percent of the bank’s deposits and eleven percent of reported loans are from this AA.

The AA is a mix of metropolitan and rural areas along the Ohio River where the states of Ohio, West Virginia, and Kentucky meet. The cities of Huntington and Ashland are the population centers. According to the Huntington Area Development Council, medical and education entities are the top employers in the area. Unemployment levels increased during the evaluation period. According to the U.S. Bureau of Labor Statistics, the MSA’s annual unadjusted unemployment level went from 5.0 percent in 2006 to 7.9 percent in 2009, and was 8.3 percent in October 2010.

June 30, 2010 FDIC deposit data reflects that PBNA is ranked twelfth in size within the area with a four percent share of the insured deposit market. Competition is strong as there are 21 insured institutions operating 81 offices in this three-county area with a population of less than 200 thousand. Financial institutions range from local community banks to large regional and national companies. Many competitors do not have branches located in the area or are not

depository institutions. According to aggregate HMDA data, over 150 lenders originated home mortgage loans in the AA during 2009.

The opportunities to make CD loans, qualified investments, and provide CD services within the Huntington-Ashland AA have been somewhat limited, especially for larger projects. The competition for involvement in larger projects is high as a large number of financial institutions operate in the AA, as discussed above. There are community development organizations operating in the area which have the capacity to help address community needs that banks can partner with and provide support to.

We met with a community development organization, reviewed bank information, and information from other sources. Additional support for and the provision of financial literacy programs, including budget management and credit counseling is needed. Other community needs include employment opportunities and utility assistance programs.

Parkersburg-Marietta, WV-OH MSA (37620)

Demographic Information for Full-Scope Area: Parkersburg-Marietta MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	43	0.00	18.60	67.44	13.95	0.00
Population by Geography	151,237	0.00	12.42	75.34	12.25	0.00
Owner-Occupied Housing by Geography	45,786	0.00	9.25	77.02	13.73	0.00
Businesses by Geography	10,058	0.00	26.01	65.05	8.94	0.00
Farms by Geography	355	0.00	8.17	77.18	14.65	0.00
Family Distribution by Income Level	42,777	18.47	19.09	21.88	40.57	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	16,065	0.00	15.47	76.99	7.54	0.00
Median Family Income	= \$40,321	Median Housing Value		= 75,275		
HUD Adjusted Median Family Income for 2009	= \$50,900	Unemployment Rate		= 8.4%		
Households Below the Poverty Level	= 13%	(October 2010 unadjusted)				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2009 HUD updated MFI.

The Parkersburg-Marietta AA is comprised of Wood County in West Virginia and Washington County in Ohio. These counties represent the portion of the Parkersburg-Marietta, WV-OH Multistate MSA (37620) where the bank has branch offices. The full MSA is not included as the bank does not have offices in Pleasants County and Wirt County in West Virginia. Approximately 49 percent of the bank’s deposits and 40 percent of reported loans are from this AA.

The AA is a mix of metropolitan and rural areas along the Ohio and West Virginia border. The cities of Marietta and Parkersburg are the population centers, and PNBA is headquartered in Marietta. There are no designated low-income neighborhoods in the area. According to the Southeastern Ohio Port Authority, the leading employment sectors of Washington County are manufacturing, retail, and health care / social assistance. For Wood County, the leading employment sectors are retail and health care / social assistance according to the U.S. Census Bureau. U.S. Bureau of Labor Statistics data reflects that the MSA’s unemployment rate increased during the evaluation period. The annual unadjusted unemployment level of the MSA went from 4.8 percent in 2006 to 9.2 percent in 2009, and was 8.4 percent in October 2010.

June 30, 2010 FDIC deposit data reflects that PBNA is number one in size within the area with 26 percent of the insured deposit market. Financial institutions range from local community banks to large regional and national companies. Competition is strong as there are 20 insured institutions operating 62 offices in this two-county area with a population of approximately 150 thousand. Many competitors do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, over 125 lenders originated home mortgage

loans in the AA during 2009.

The opportunities to make CD loans, qualified investments, and provide CD services within the Parkersburg-Marietta AA have been somewhat limited, especially for larger projects. The competition for involvement in larger projects is high as a large number of financial institutions operate in the AA, as discussed above. There are a good number of community development organizations operating in the area which have the capacity to help address community needs that banks can partner with and provide support to.

We met with two community development organizations, reviewed bank information, and information from other sources. Loans for home repairs are an identified need. There is a general need for decent housing, including the rehabilitation of owner-occupied homes and rental units. Infrastructure improvement is needed in some areas. Also, additional support for and the provision of financial literacy programs is needed, including those for homebuyers as well as foreclosure prevention counseling.

Ohio Non-MSA Area

Demographic Information for Full-Scope Area: Ohio Non-MSA Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	69	1.45	33.33	59.42	5.80	0.00
Population by Geography	290,649	0.96	30.46	62.89	5.69	0.00
Owner-Occupied Housing by Geography	79,477	0.09	30.57	63.49	5.85	0.00
Businesses by Geography	19,954	0.73	30.52	61.51	7.24	0.00
Farms by Geography	1,125	0.09	27.47	69.07	3.38	0.00
Family Distribution by Income Level	74,970	24.67	20.41	22.99	31.93	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	33,797	0.41	39.00	57.24	3.35	0.00
Median Family Income = \$43,801 HUD Adjusted Median Family Income for 2009 = \$53,800 Households Below the Poverty Level = 18%				Median Housing Value = 72,929 Unemployment Rate = 10.9% (October 2010 unadjusted)		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2009 HUD updated MFI.

The Ohio Non-MSA AA is comprised of the counties of Athens, Gallia, Guernsey, Meigs, Morgan, Muskingum and Noble, plus a portion of Hocking County, all located in south-east Ohio. This is a contiguous area that is not located in any metropolitan statistical area. Approximately 27 percent of the bank’s deposits and 36 percent of reported loans are from this AA. When PBNA opened its Zanesville office in 2009, the AA was expanded to include all tracts in Muskingum County.

The AA is primarily a rural area with villages, townships, and small cities located throughout. While moderate-income areas comprise one-third of all geographies, there is only one designated low-income census tract within the entire area. Middle-income tracts comprise nearly 60 percent of all geographies, and all were designated as distressed and/or underserved during at least a portion of the evaluation period.

U.S. Census Bureau data reflects that the leading employment sectors for the area are government, retail, health care / social assistance, and manufacturing. Tourism has also been growing within various parts of the area. U.S. Bureau of Labor Statistics data reflects that the MSA’s unemployment rate increased during the evaluation period. The annual unadjusted unemployment level of the combined area went from 6.7 percent in 2006 and was to 11.4 percent in 2009, and was 10.9 percent in October 2010.

June 30, 2010 FDIC deposit data reflects that PBNA is third in size within the area with ten percent of the insured deposit market. Financial institutions range from local community banks to large regional and national companies. Competition is strong as there are 24 insured

institutions operating 118 offices in the eight-county area with a population of less than 300 thousand. Many competitors do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, nearly 200 lenders originated home mortgage loans in the AA during 2009.

The opportunities to make CD loans, qualified investments, and provide CD services within the Ohio Non-MSA AA have been somewhat limited, especially for larger projects. The competition for involvement in larger projects is high as a large number of financial institutions operate in the AA, as discussed above. There are a number of community development organizations operating in the area which have the capacity to help address community needs that banks can partner with and provide support to.

We met with three community development organizations, reviewed bank information, and information from other sources. General operating support for community service programs is needed. Also, additional support for and the provision of financial literacy programs such as homebuyer education is needed.

West Virginia Non-MSA Area

Demographic Information for Full-Scope Area: West Virginia Non-MSA Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0.00	0.00	77.78	22.22	0.00
Population by Geography	43,650	0.00	0.00	82.77	17.23	0.00
Owner-Occupied Housing by Geography	14,189	0.00	0.00	82.70	17.30	0.00
Businesses by Geography	2,092	0.00	0.00	83.56	16.44	0.00
Farms by Geography	111	0.00	0.00	96.40	3.60	0.00
Family Distribution by Income Level	12,782	20.70	16.53	19.12	43.65	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	4,759	0.00	0.00	86.09	13.91	0.00
Median Family Income = \$32,500 HUD Adjusted Median Family Income for 2009 = \$43,100 Households Below the Poverty Level = 20%				Median Housing Value = 59,393 Unemployment Rate October 2010 (Unadjusted) Mason County = 11.7% Wetzel County = 11.5%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2009 HUD updated MFI

The West Virginia Non-MSA AA is comprised of Mason and Wetzel counties in western West Virginia along the border with the State of Ohio. Neither of these counties is located in any metropolitan statistical area. Approximately eleven percent of the bank's deposits and six percent of reported loans are from this AA.

The AA is primarily rural. While there are no low- or moderate-income geographies, the area is primarily comprised of middle-income census tracts, all of which were designated as distressed for the majority of the evaluation period. U.S. Census Bureau data reflects that the leading employment sectors are government, retail, health care / social assistance in Mason County, and government and retail in Wetzel County. U.S. Bureau of Labor Statistics data reflects that the unemployment rate in West Virginia increased during the evaluation period. The annual unadjusted unemployment level went from 4.5 percent in 2006 to 7.9 percent in 2009. Both Mason and Wetzel counties have been higher than the state average. As of October 2010, the unadjusted rate in Mason County was 11.7 percent, and 11.5 percent in Wetzel County.

June 30, 2010 FDIC deposit data reflects that PBNA is ranked first in size within the area with 28 percent of the insured deposit market. Financial institutions range from local community banks to regional companies. Competition is strong as there are 10 insured institutions operating 20 offices in this two-county area with a population under 50 thousand. Many competitors do not have branches located in the area or are not depository institutions. According to aggregate HMDA data, 50 lenders originated home mortgage loans in the AA during 2009.

Opportunities to make CD loans, qualified investments, and provide CD services within the West Virginia Non-MSA AA have been limited, especially for larger projects. There are few community development organizations that banks can partner with which have the capacity to help address community needs.

We met with a community development organization, reviewed bank information, and information from other sources. Loans for home repairs are an identified need. Also, additional support for and the provision of financial literacy programs is needed, including those for homebuyers as well as foreclosure prevention counseling.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As ___12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated

and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

Multistate Metropolitan Areas

State of Ohio

State of West Virginia

Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE MSA AREAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Huntington-Ashland MSA	100.00	367	38,770	161	23,655	0	0	0	2,216	533	64,641	100.00
Parkersburg-Marietta MSA	100.00	1,573	155,990	371	45,066	0	0	9	923	1,953	201,979	100.00

LENDING VOLUME		Geography: OHIO						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
OH Non-MSA	83.31	1,259	115,922	475	46,883	3	147	3	197	1,737	163,149	87.21
Limited Review:												
Belmont County	2.30	25	1,742	22	945	1	29	0	0	48	2,716	2.81
Fairfield County	14.39	93	11,952	205	27,373	2	120	0	0	300	39,445	9.98

LENDING VOLUME		Geography: WEST VIRGINIA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
WV Non-MSA	100.00	227	15,332	41	3,572	1	10	0	1,703	272	20,617	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 23, 2006 to November 22, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MULTISTATE MSA AREAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MSA	118	100.00	0.19	0.00	10.72	9.32	51.98	50.85	37.11	39.83	0.92	0.00	0.71	1.10	0.78
Parkersburg-Marietta MSA	575	100.00	0.00	0.00	9.25	8.70	77.02	77.04	13.73	14.26	8.80	0.00	5.13	9.94	6.58

Geographic Distribution: HOME PURCHASE		Geography: OHIO						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
OH Non-MSA	433	91.35	0.09	0.46	30.57	39.26	63.49	58.20	5.85	2.08	4.65	0.00	8.60	3.74	2.13
Limited Review:															
Belmont County	10	2.11	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.65	0.00	0.00	0.65	0.00
Fairfield County	31	6.54	0.00	0.00	20.31	32.26	49.57	54.84	30.11	12.90	0.28	0.00	0.29	0.22	0.33

Geographic Distribution: HOME PURCHASE		Geography: WEST VIRGINIA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
WV Non-MSA	69	100.00	0.00	0.00	0.00	0.00	82.70	69.57	17.30	30.43	7.44	0.00	0.00	4.32	16.98

* Based on 2009 Peer Mortgage Data

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE MSA AREAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MSA	51	100.00	0.19	0.00	10.72	7.84	51.98	43.14	37.11	49.02	2.86	0.00	0.00	3.19	2.94
Parkersburg-Marietta MSA	140	100.00	0.00	0.00	9.25	8.57	77.02	80.71	13.73	10.71	8.11	0.00	11.43	8.70	2.22

Geographic Distribution: HOME IMPROVEMENT		Geography: OHIO						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
OH Non-MSA	184	94.36	0.09	0.54	30.57	39.67	63.49	58.15	5.85	1.63	13.87	0.00	8.33	16.48	12.50
Limited Review:															
Belmont County	4	2.05	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.89	0.00	0.00	1.89	0.00
Fairfield County	7	3.59	0.00	0.00	20.31	28.57	49.57	71.43	30.11	0.00	0.00	0.00	0.00	0.00	0.00

Geographic Distribution: HOME IMPROVEMENT		Geography: WEST VIRGINIA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
WV Non-MSA	37	100.00	0.00	0.00	0.00	0.00	82.70	83.78	17.30	16.22	2.22	0.00	0.00	2.47	0.00

* Based on 2009 Peer Mortgage Data

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATE MSA AREAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
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MA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MSA	195	100.00	0.19	0.00	10.72	4.10	51.98	51.79	37.11	44.10	1.93	0.00	1.52	1.69	2.26
Parkersburg-Marietta MSA	851	100.00	0.00	0.00	9.25	4.94	77.02	80.26	13.73	14.81	14.67	0.00	7.74	15.44	13.47

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: OHIO Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009															
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
OH Non-MSA	634	90.70	0.09	0.00	30.57	33.12	63.49	64.04	5.85	2.84	5.83	0.00	8.65	5.45	2.74
Limited Review:															
Belmont County	11	1.57	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.80	0.00	0.00	1.80	0.00
Fairfield County	54	7.73	0.00	0.00	20.31	12.96	49.57	66.67	30.11	20.37	0.57	0.00	0.56	0.91	0.25

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: WEST VIRGINIA Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009															
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
WV Non-MSA	121	100.00	0.00	0.00	0.00	0.00	82.70	90.08	17.30	9.92	11.34	0.00	0.00	11.05	12.66

* Based on 2009 Peer Mortgage Data

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: MULTISTATE MSA AREAS								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:																	
Huntington-Ashland MSA	3	100.00	18.38	0.00	28.36	0.00	24.56	33.33	28.70	66.67	2.56	0.00	0.00	11.11	0.00		
Parkersburg-Marietta MSA	7	100.00	0.00	0.00	29.94	71.43	63.22	28.57	6.84	0.00	0.00	0.00	0.00	0.00	0.00		

Geographic Distribution: MULTIFAMILY			Geography: OHIO								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:																	
OH Non-MSA	8	88.89	9.25	25.00	26.82	37.50	50.01	37.50	13.92	0.00	0.00	0.00	0.00	0.00	0.00		
Limited Review:																	
Belmont County	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Fairfield County	1	11.11	0.00	0.00	44.41	0.00	44.75	100.00	10.84	0.00	0.00	0.00	0.00	0.00	0.00		

Geographic Distribution: MULTIFAMILY			Geography: WEST VIRGINIA								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:																	
WV Non-MSA	0	0.00	0.00	0.00	0.00	0.00	84.76	0.00	15.24	0.00	0.00	0.00	0.00	0.00	0.00		

* Based on 2009 Peer Mortgage Data. Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

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

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MULTISTATE MSA AREAS								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
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MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
Huntington-Ashland MSA	161	100.00	8.57	3.11	13.03	13.66	44.59	52.80	33.80	30.43	1.19	0.00	0.22	1.74	1.29	
Parkersburg-Marietta MSA	371	100.00	0.00	0.00	26.01	28.30	65.05	59.57	8.94	12.13	2.92	0.00	3.33	2.65	3.89	

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
OH Non-MSA	475	67.66	0.73	0.63	30.52	44.42	61.51	51.79	7.24	3.16	1.85	0.00	3.33	1.43	1.09	
Limited Review:																
Belmont County	22	3.13	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.18	0.00	0.00	0.25	0.00	
Fairfield County	205	29.20	0.00	0.00	25.51	21.95	44.93	72.20	29.56	5.85	0.66	0.00	0.47	1.29	0.10	

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: WEST VIRGINIA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
WV Non-MSA	41	100.00	0.00	0.00	0.00	0.00	83.56	85.37	16.44	14.63	2.69	0.00	0.00	2.94	2.67	

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: MULTISTATE MSA AREAS				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009								
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MSA	0	100.00	1.20	0.00	8.37	0.00	56.18	0.00	34.26	0.00	0.00	0.00	0.00	0.00	0.00
Parkersburg-Marietta MSA	0	100.00	0.00	0.00	8.17	0.00	77.18	0.00	14.65	0.00	0.00	0.00	0.00	0.00	0.00

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009								
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
OH Non-MSA	3	50.00	0.09	0.00	27.47	33.33	69.07	66.67	3.38	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Belmont County	1	16.67	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fairfield County	2	33.33	0.00	0.00	8.54	0.00	66.90	100.00	24.56	0.00	0.00	0.00	0.00	0.00	0.00

Geographic Distribution: SMALL LOANS TO FARMS			Geography: WEST VIRGINIA				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009								
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
WV Non-MSA	1	100.00	0.00	0.00	0.00	0.00	96.40	100.00	3.60	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: MULTISTATE MSA AREAS								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MSA	118	100.00	20.57	10.00	16.44	20.91	20.32	20.91	42.67	48.18	0.80	1.82	0.33	0.67	0.91
Parkersburg-Marietta MSA	575	100.00	18.47	11.88	19.09	24.52	21.88	25.29	40.57	38.31	8.64	9.70	8.19	6.95	9.87

Borrower Distribution: HOME PURCHASE			Geography: OHIO								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
OH Non-MSA	433	91.35	24.67	12.22	20.41	30.56	22.99	26.41	31.93	30.81	5.46	4.02	5.59	5.75	5.63
Limited Review:															
Belmont County	10	2.11	22.18	10.00	20.10	20.00	22.34	20.00	35.37	50.00	0.80	0.00	0.00	0.00	2.04
Fairfield County	31	6.54	16.71	7.41	20.20	29.63	24.02	14.81	39.07	48.15	0.32	0.00	0.00	0.19	0.99

Borrower Distribution: HOME PURCHASE			Geography: WEST VIRGINIA								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
WV Non-MSA	69	100.00	20.70	11.76	16.53	30.88	19.12	19.12	43.65	38.24	7.96	9.09	11.54	4.76	8.91

* Based on 2009 Peer Mortgage Data. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.8% Huntington-Ashland of loans, 9.2% of Parkersburg-Marietta loans, 5.5% of OH Non-MSA loans, 0.0% of Belmont County loans, 12.9% of Fairfield County loans, and 1.4% of WV Non-MSA home purchase loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTISTATE MSA AREAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MSA	51	100.00	20.57	12.24	16.44	12.24	20.32	16.33	42.67	59.18	2.97	6.25	1.22	2.06	3.54
Parkersburg-Marietta MSA	140	100.00	18.47	15.44	19.09	27.94	21.88	19.12	40.57	37.50	8.65	9.09	10.14	5.56	9.48

Borrower Distribution: HOME IMPROVEMENT		Geography: OHIO						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
OH Non-MSA	184	94.36	24.67	20.11	20.41	23.46	22.99	28.49	31.93	27.93	13.91	10.53	8.47	20.83	13.40
Limited Review:															
Belmont County	4	2.05	22.18	25.00	20.10	0.00	22.34	0.00	35.37	75.00	1.89	0.00	0.00	0.00	4.76
Fairfield County	7	3.59	16.71	16.67	20.20	16.67	24.02	33.33	39.07	33.33	0.00	0.00	0.00	0.00	0.00

Borrower Distribution: HOME IMPROVEMENT		Geography: WEST VIRGINIA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
WV Non-MSA	37	100.00	20.70	16.22	16.53	27.03	19.12	29.73	43.65	27.03	2.35	0.00	0.00	4.35	2.22

* Based on 2009 Peer Mortgage Data. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)
 ** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
 *** Percentage of Families is based on the 2000 Census information.
 **** As a percentage of loans with borrower income information available. No information was available for 3.9% Huntington-Ashland of loans, 2.9% of Parkersburg-Marietta loans, 2.7 of OH Non-MSA loans, 0.0% of Belmont County loans, 14.3% of Fairfield County loans, and 0.0% of WV Non-MSA home improvement loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATE MSA AREAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
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MA/Assessment Area:	Total Home Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	Over all	Low	Mod	Mid	Upp
Full Review:															
Huntington-Ashland MSA	195	100.00	20.57	9.14	16.44	17.20	20.32	26.34	42.67	47.31	2.13	2.11	2.20	2.43	2.00
Parkersburg-Marietta MSA	851	100.00	18.47	11.14	19.09	17.29	21.88	28.17	40.57	43.41	14.85	15.66	16.95	14.91	14.11

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: OHIO							Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009								
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	Over all	Low	Mod	Mid	Upp
Full Review:															
OH Non-MSA	634	90.70	24.67	9.70	20.41	22.04	22.99	31.25	31.93	37.01	6.92	6.31	7.76	7.43	6.34
Limited Review:															
Belmont County	11	1.57	22.18	9.09	20.10	27.27	22.34	27.27	35.37	36.36	2.28	0.00	5.88	0.00	2.40
Fairfield County	54	7.73	16.71	17.31	20.20	15.38	24.02	28.85	39.07	38.46	0.70	1.25	0.43	0.75	0.69

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: WEST VIRGINIA							Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009								
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	Over all	Low	Mod	Mid	Upp
Full Review:															
WV Non-MSA	121	100.00	20.70	5.13	16.53	20.51	19.12	27.35	43.65	47.01	11.87	9.09	14.81	14.10	10.67

* Based on 2009 Peer Mortgage Data. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.6% Huntington-Ashland of loans, 8.2% of Parkersburg-Marietta loans, 4.1% of OH Non-MSA loans, 0.0% of Belmont County loans, 3.7% of Fairfield County loans, and 3.3% of WV Non-MSA home refinance loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATE MSA AREAS			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Huntington-Ashland MSA	161	100.00	72.26	63.35	61.49	21.12	17.39	1.19	3.31
Parkersburg-Marietta MSA	371	100.00	73.52	68.19	65.23	21.56	13.21	2.92	13.54

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
OH Non-MSA	475	67.66	76.43	78.32	75.16	12.84	12.00	1.85	8.16
Limited Review:									
Belmont County	22	3.13	75.30	95.45	95.45	0.00	4.55	0.18	1.65
Fairfield County	205	29.20	80.03	47.32	62.93	24.39	12.68	0.66	2.44

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WEST VIRGINIA			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
WV Non-MSA	41	100.00	62.62	85.37	78.05	14.63	7.32	2.69	14.06

* Based on 2009 Peer Small Business Data

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.97% Huntington-Ashland of loans, 2.7% of Parkersburg-

-Marietta loans, 2.53% of OH Non-MSA loans, 4.55% of Belmont County loans, 5.85% of Fairfield County loans, and 0.0% of WV Non-MSA small loans to businesses originated and purchased by bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATE MSA AREAS			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Huntington-Ashland MSA	0	100.00	98.01	0.00	0.00	0.00	0.00	0.00	0.00
Parkersburg-Marietta MSA	0	100.00	98.31	0.00	0.00	0.00	0.00	0.00	0.00

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OHIO			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	#	% of Total**	% of Farms***	% BANK Loans****	#
Full Review:									
OH Non-MSA	3	50.00	99.20	100.00	100.00	0.00	0.00	0.00	0.00
Limited Review:									
Belmont County	1	16.67	100.00	100.00	100.00	0.00	0.00	0.00	0.00
Fairfield County	2	33.33	98.78	100.00	100.00	0.00	0.00	0.00	0.00

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WEST VIRGINIA			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	#	% of Total**	% of Farms***	% BANK Loans****	#
Full Review:									
WV Non-MSA	1	100.00	99.10	100.00	100.00	0.00	0.00	0.00	0.00

* Based on 2009 Peer Small Business Data

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2009).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.0% of small loans to farms for any area.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MULTISTATE MSA AREAS				Evaluation Period: OCTOBER 23, 2006 TO NOVEMBER 22, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Huntington-Ashland MSA	1	200	29	1,190	30	1,390	100.00	0	0
Parkersburg-Marietta MSA	0	0	41	181	41	181	100.00	0	0

QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: OCTOBER 23, 2006 TO NOVEMBER 22, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
OH Non-MSA	3	525	59	193	62	718	97.03	0	0
Limited Review:									
Belmont County	0	0	2	2	2	2	0.27	0	0
Fairfield County	0	0	10	20	10	20	2.70	0	0
Other Investments:									
Statewide - AA impact	3	740	1	600	4	1,340	-----	0	0
In state - no AA impact	0	0	1	574	1	574	-----	0	0

QUALIFIED INVESTMENTS		Geography: WEST VIRGINIA				Evaluation Period: OCTOBER 23, 2006 TO NOVEMBER 22, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
WV Non-MSA	1	25	23	33	24	58	100.00	0	0

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

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

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

DISTRIBUTION AND OPENINGS/CLOSINGS OF BRANCHES				Geography: MULTISTATE MSA AREAS				Evaluation Period: OCTOBER 23, 2006 TO NOVEMBER 22, 2010									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Huntington-Ashland MSA	100.00	6	100.00	0.00	16.67	50.00	33.33	1	0	0	0	+1	0	2.96	14.10	48.18	34.76
Parkersburg-Marietta MSA	100.00	12	100.00	0.00	33.33	66.67	0.00	0	1	0	0	-1	0	0.00	12.42	75.34	12.25

DISTRIBUTION AND OPENINGS/CLOSINGS OF BRANCHES				Geography: OHIO				Evaluation Period: OCTOBER 23, 2006 TO NOVEMBER 22, 2010									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
OH Non-MSA	87.21	16	76.19	0	62.50	33.50	0.00	2	3	0	-1	0	0	0.96	30.46	62.89	5.69
Limited Review:																	
Belmont County	2.81	1	4.76	0	0	100.00	0	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Fairfield County	9.98	4	19.05	0	50.00	25.00	25.00	1	0	0	0	0	+1	0.00	23.36	48.81	27.83

DISTRIBUTION AND OPENINGS/CLOSINGS OF BRANCHES				Geography: WEST VIRGINIA				Evaluation Period: OCTOBER 23, 2006 TO NOVEMBER 22, 2010									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
WV Non-MSA	100.00	5	100.00	0	0	80.00	20.00	0	0	0	0	0	0	0.00	0.00	82.77	17.23