

# **PUBLIC DISCLOSURE**

April 28, 2014

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Ohio Valley Bank Company  
RSSD# 498317

420 Third Avenue  
Gallipolis, Ohio 45631

Federal Reserve Bank of Cleveland  
P.O. Box 6387  
Cleveland, Ohio 44101-1387

**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, nor should it 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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## INSTITUTION

**INSTITUTION'S CRA RATING: This institution is rated: Satisfactory**

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Satisfactory**

The major factors and criteria contributing to this rating include:

- A reasonable loan-to-deposit ratio, given the bank's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending-related activities are in the assessment area;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area;
- A reasonable penetration among individuals of different income (including low- and moderate-income (LMI) individuals) levels and businesses of different revenue sizes given the demographics of the assessment area;
- There were no CRA-related complaints filed against the bank since the previous Community Reinvestment Act (CRA) examination; and,
- A reasonable level of responsiveness to the community development needs of its assessment area.

### **Previous Performance Evaluation**

The Ohio Valley Bank Company (OVB) received a "Satisfactory" rating as a result of a performance evaluation completed by the Federal Deposit Insurance Corporation dated September 13, 2010. The lending and community development tests were both rated "Satisfactory."

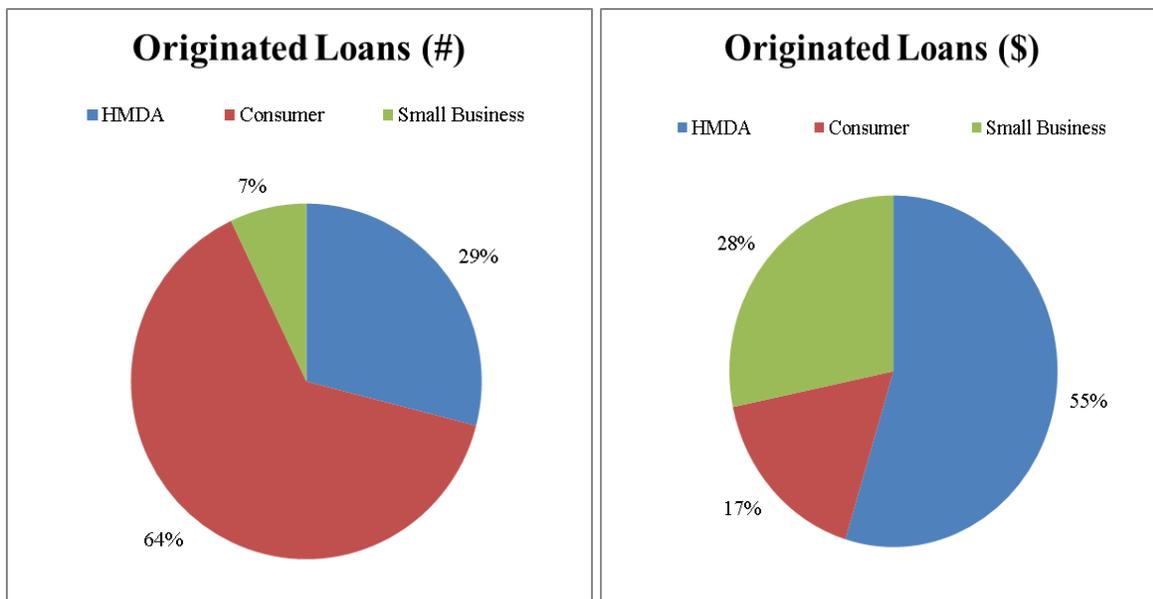
### SCOPE OF EXAMINATION

The Ohio Valley Bank Company (OVB) Community Reinvestment Act (CRA) performance was evaluated using the Interagency Intermediate Small Bank procedures under Regulation BB. The bank’s CRA performance included lending data from January 1, 2012 to December 31, 2013 and community development activities from September 13, 2010 to April 28, 2014.

The loan products evaluated included consumer loans, small business loans and mortgage loans reported under the Home Mortgage Disclosure Act (HMDA). Consumer loans reviewed included motor vehicle loans while HMDA loans consist of home purchase, refinance and home improvement loans.

The following table and charts illustrate the volume and distribution of loans originated during the evaluation period.

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	902	97,064
Consumer	1987	30,137
Small Business	220	50,131
<b>Total</b>	<b>3,109</b>	<b>177,332</b>



Given the bank’s activity and focus, HMDA lending and consumer lending were weighted equally but greater than small business lending.

OVB has three assessment areas throughout Ohio and West Virginia, including:

- Nonmetropolitan Ohio (Non-MSA OH), which includes:
  - Gallia County
  - Jackson County
  - Meigs County
  - Pike County
  
- Nonmetropolitan West Virginia (Non-MSA WV), which includes:
  - Mason County
  
- Huntington–Ashland Metropolitan Statistical Area (Huntington-Ashland MSA), which includes:
  - Cabell County
  - Lawrence County

Each area received a full-scope review; however, Non-MSA OH received greater weight given the majority of the bank’s locations, deposit and lending occurred in this assessment area. A detailed description of each assessment area is presented in subsequent sections of this performance evaluation and assessment area maps may be found in Appendix C.

Geographic distribution and borrower distribution were weighted equally based on the number of low- and moderate-income tracts compared to the number of low- and moderate-income individuals in the assessment area.

In some cases, information for originated loans could not be provided by the bank. Therefore, the loan volumes used for borrower distribution are based on a sample of originated loans and are lower than the number of originated loans listed above.

## DESCRIPTION OF INSTITUTION

OVB became a state member bank of the Fourth District in May 2013. OVB is the subsidiary of Ohio Valley Bank Corporation, which is headquartered in Gallipolis, Ohio. OVB reported total assets of \$735 million as of December 31, 2013, a decrease of 2.4% since the previous examination in September 2010.

In addition to the main office located in the city of Gallipolis, OVB operates 13 branch offices and 25 automated teller machines (ATMs) throughout southeastern Ohio and northern West Virginia. The bank has plans to close one office located in a Walmart on May 29, 2014. The bank also has one loan production office that is not a full-service branch, but allows customers to apply for loans and make inquiries. Of the 14 branch offices, 10 are located in Non-MSA OH, while three are located in the Huntington-Ashland MSA and one is located in Non-MSA WV. Of the 25 ATMs, 11 are standalone and 14 are cash-only ATMs. Eighteen of the ATMs are located in Non-MSA OH, while there are four located in the Huntington-Ashland MSA and three in Non-MSA WV. Customers may also perform banking transactions via mobile banking.

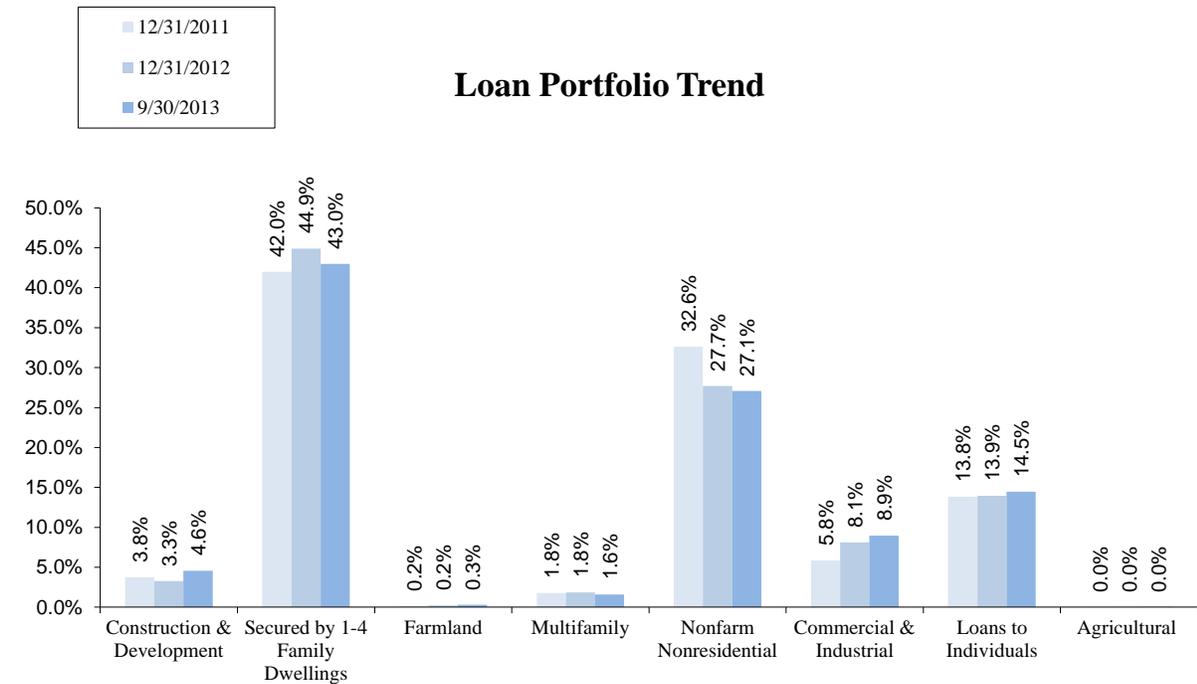
Commercial and residential real estate lending are key business lines for the institution. As details regarding the bank's loan portfolio indicate, real estate lending represents the largest concentration of lending by dollar amount, followed by commercial lending.

OVB is a full-service retail bank offering deposit accounts and commercial, agricultural, real estate and consumer loans. As of December 31, 2013, the loan portfolio totaled \$555 million.

The following chart and table represent the bank's loan portfolio as of September 30, 2013.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	9/30/2013		12/31/2012		12/31/2011	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	24,169 <sup>1</sup>	4.6%	17,376 <sup>1</sup>	3.3%	21,471 <sup>1</sup>	3.8%
Secured by One- to Four- Family Dwellings	227,365 <sup>1</sup>	43.0%	237,741 <sup>1</sup>	44.9%	240,362 <sup>1</sup>	42.0%
Other Real Estate: Farmland	1,730 <sup>1</sup>	0.3%	1,188 <sup>1</sup>	0.2%	1,143 <sup>1</sup>	0.2%
Other Real Estate: Multifamily	8,443 <sup>1</sup>	1.6%	9,736 <sup>1</sup>	1.8%	10,157 <sup>1</sup>	1.8%
Other Real Estate: Nonfarm nonresidential	143,250 <sup>1</sup>	27.1%	146,710 <sup>1</sup>	27.7%	186,685 <sup>1</sup>	32.6%
Commercial and Industrial	47,310 <sup>1</sup>	8.9%	42,974 <sup>1</sup>	8.1%	33,371 <sup>1</sup>	5.8%
Loans to Individuals	76,525 <sup>1</sup>	14.5%	73,824 <sup>1</sup>	13.9%	79,149 <sup>1</sup>	13.8%
Agricultural Loans	151 <sup>1</sup>	0.0%	25 <sup>1</sup>	0.0%	44 <sup>1</sup>	0.0%
<b>Total</b>	<b>\$528,943<sup>1</sup></b>	<b>100.00%</b>	<b>\$529,574<sup>1</sup></b>	<b>100.00%</b>	<b>\$572,382<sup>1</sup></b>	<b>100.00%</b>

\* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.



As of December 31, 2013, OVB’s investment portfolio was approximately \$123 million. The investment portfolio is primarily comprised of U.S. Treasury & Agency Securities, which accounts for 68.3%. The remaining investment portfolio is comprised of Municipal Securities (18.6%) and Interest-Bearing Bank Balances (13.1%).

There are no legal or financial constraints preventing OVB from meeting the credit needs of its assessment area consistent with its asset size, business strategy, resources, and local economy.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### Lending Test

OVB’s overall performance under the lending test is rated “Satisfactory.” The bank’s performance in the states of Ohio and West Virginia and in the Huntington-Ashland Multistate MSA is considered “Satisfactory” as lending in all three assessment areas is adequate.

Throughout this performance evaluation, references are made to the bank’s and the peer’s lending distribution by geography and borrower income or revenue. Detailed information about the percentage of HMDA-reportable, consumer and small business loans can be found in Appendix B.

### *Loan-to-Deposit Ratio*

A financial institution’s loan-to-deposit (LTD) ratio compares the institution’s aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution’s lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing the total by the numbers of quarters.

The following table illustrates OVB’s quarterly LTD ratios for 14 quarters since the previous evaluation, along with the average LTD ratio for the same period for the bank’s aggregate national peer group, which consists of all insured commercial banks having assets between \$300 million and \$1 billion, and three local peer banks.

<b>Ohio Valley Bank Co. Loan-to-Deposit Ratios</b>						
<b>As of Date</b>	<b>Ohio Valley Bank Co.</b>	<b>Peer Ratio</b>	<b>Farmers Bank and Savings Co.</b>	<b>Huntington FSB</b>	<b>First National Bank of Waverly</b>	<b>Custom Peer</b>
December 31, 2013	87.02	75.76	85.31	45.47	54.88	61.89
September 30, 2013	85.40	75.10	87.37	45.09	54.43	62.30
June 30, 2013	84.07	74.85	84.39	45.05	58.95	62.80
March 31, 2013	73.83	73.18	83.89	45.33	59.68	62.97
December 31, 2012	82.42	73.96	84.70	45.89	64.26	64.95
September 30, 2012	80.37	74.48	83.46	46.20	65.20	64.95
June 30, 2012	79.96	74.28	80.84	45.83	65.18	63.95
March 31, 2012	75.35	73.28	79.58	46.87	64.70	63.72
December 31, 2011	84.30	75.10	82.51	0.00	65.61	74.06
September 30, 2011	84.57	75.89	82.65	0.00	68.19	75.42
June 30, 2011	88.92	76.64	81.28	0.00	67.77	74.53
March 31, 2011	84.26	76.48	83.31	0.00	66.74	75.03
December 31, 2010	89.38	78.86	85.43	0.00	72.93	79.18
September 30, 2010	89.25	79.68	85.25	0.00	71.12	78.19
<b>Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation</b>	<b>83.51</b>	<b>75.54</b>	<b>83.57</b>	<b>45.72</b>	<b>64.26</b>	<b>64.52</b>

The bank averaged an 83.5% LTD over the past 14 quarters. The bank's average LTD ratio is higher than the national peer group's average LTD ratio of 75.5% and custom peer average of 64.5%. While bank management attributed the decrease in LTD ratios to an overall decrease in loan demand since the economic downturn, LTDs have seen an increasing trend over the past three quarters, indicating an effective lending philosophy.

When comparing OVB's quarterly LTD ratio to its local peer banks, OVB maintains a higher LTD ratio than the peer ratio, but remains in line with their most relevant peer bank in the market area.

Therefore, considering the bank's lending-related activity, size, financial condition and assessment area credit needs, OVB's LTD ratio is considered reasonable.

### ***Lending Activity***

Given the number and dollar amounts of HMDA, consumer, and small business loans originated, as well as the bank's strategic objectives, economic conditions, and competitive factors, OVB demonstrated a good responsiveness to local credit needs.

### ***Assessment Area Concentration***

The bank's consumer lending, mortgage lending and small business lending were analyzed to determine the volume of lending inside and outside the bank's three assessment areas. Of the bank's total loans, 81.2% by volume and 75.8% by dollar amount were made inside the assessment areas.

The table below shows the distribution of loans inside and outside the bank's assessment areas.

**Lending Inside and Outside the Assessment Area**

Loan Type - Description	Inside				Outside				Total	
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	\$(000s)
MV - Motor Vehicle	1,580	79.5	24,818	82.3	407	20.5	5,320	17.7	1,987	30,137
<b>Total Consumer-related</b>	<b>1,580</b>	<b>79.5</b>	<b>24,818</b>	<b>82.4</b>	<b>407</b>	<b>20.5</b>	<b>5,320</b>	<b>17.7</b>	<b>1,987</b>	<b>30,137</b>
CV - Home Purchase - Conventional	296	84.6	32,320	84.4	54	15.4	5,970	15.6	350	38,290
HI - Home Improvement	116	87.9	3,299	70.6	16	12.1	1,374	29.4	132	4,673
MF - Multi-Family Housing	3	75.0	3,503	73.3	1	25.0	1,275	26.7	4	4,778
RF - Refinancing	353	84.9	40,852	82.8	63	15.1	8,471	17.2	416	49,323
<b>Total HMDA related</b>	<b>768</b>	<b>85.1</b>	<b>79,974</b>	<b>82.4</b>	<b>134</b>	<b>14.9</b>	<b>17,090</b>	<b>17.6</b>	<b>902</b>	<b>97,064</b>
SB - Small Business	178	80.9	29,707	59.3	42	19.1	20,424	40.7	220	50,131
<b>Total Small Business-related</b>	<b>178</b>	<b>80.9</b>	<b>29,707</b>	<b>59.3</b>	<b>42</b>	<b>19.1</b>	<b>20,424</b>	<b>40.7</b>	<b>220</b>	<b>50,131</b>
<b>TOTAL LOANS</b>	<b>2,526</b>	<b>81.2</b>	<b>134,499</b>	<b>75.8</b>	<b>583</b>	<b>18.8</b>	<b>42,833</b>	<b>24.2</b>	<b>3,109</b>	<b>177,332</b>

A high percentage of OVB's loans were made within the bank's CRA delineated footprint.

### ***Geographic and Borrower Distribution***

Geographic distribution and borrower distribution were weighted equally based on the overall assessment area's percentage of low- and moderate-income geographies at 40.6% compared to the percentage of low- and moderate-income population at 43.7%.

Overall, the geographic and borrower distribution of loans is considered reasonable and reflects a comparable performance to the distribution of loans among different income tracts and to borrowers of different income levels and to businesses of different revenue sizes. Geographic distribution is considered adequate in the Huntington-Ashland Multistate MSA, Non-MSA OH and Non-MSA WV. Borrower distribution is also considered adequate in the Huntington-Ashland Multistate MSA, Non-MSA OH, and Non-MSA WV. There were no significant lending gaps. Refer to the respective assessment area analyses for further details.

In addition to traditional lending programs, the bank offers a Rent Buster Loan Program that is designed to allow individuals with a good credit history to purchase a home with no money down. This program is not affiliated with any government entities and allows individuals to finance 100% of the cost of the home. A total of 51 loans were originated under this program since the previous examination totaling over \$4.7 million. This program demonstrates the bank's flexibility in providing loan programs outside of traditional credit products.

### ***CRA Complaints***

The bank has not received any CRA-related complaints since the previous examination.

### **Community Development Test**

#### ***Community Development Loans***

During this review period, the bank originated five community development loans totaling \$3.8 million, which is considered overall to be a relatively high level of community development loans. All five loans were originated within Ohio, resulting in a relatively high level of community development lending activity in Ohio. The majority of these loans supported revitalization efforts in low- and moderate-income areas.

There was no community development lending activity in the Huntington-Ashland Multistate MSA or West Virginia. However, OVB does not have a large branch presence in the aforementioned areas, with West Virginia having only one branch office and the Huntington-Ashland Multistate MSA having three branch offices, two of which are located in Walmarts and not full-service. Therefore, community development lending in these areas is considered adequate.

Refer to the respective assessment area analyses for further details regarding community development lending.

### ***Community Development Investments and Donations***

OVB had 17 investments and donations totaling \$61,700 during this evaluation period. The majority of the investment dollars (\$45,750) were made in the Non-MSA OH assessment area for community services and economic development. In addition, OVB invested \$15,000 for local school improvements in Non-MSA WV and \$950 for school programs and safety in the Huntington-Ashland Multistate MSA, all benefiting LMI individuals. Refer to the respective assessment area analyses for further details.

### ***Community Development Services***

#### ***Retail Services***

Retail delivery systems are reasonably accessible to all geographies, including low-income and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes.

Since the previous evaluation, the bank has closed one branch and has not opened any branch offices. The bank has plans to close another branch at the end of the month and open a branch in the near future. Through discussions with management, it was noted that the bank's intentions are to reduce the number of in-store branches and add a full-service branch in the Huntington-Ashland Multistate MSA. The institution's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems in the remaining assessment areas. Banking services and business hours do not vary in a way that inconveniences any portion of the bank's assessment area and banking centers are generally open six days a week, with full days Monday through Friday and half days on Saturday. The institution also provides services through internet banking, mobile banking, and telephone banking.

#### ***Community Development Services***

Overall, OVB provides a high level of community development services in the Huntington-Ashland Multistate MSA, Non-MSA OH, and Non-MSA WV. The institution's directors, officers, and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, and economic development.

OVB maintains a financial literacy education program through its Market and e-Strategies department. A full-time staff member is dedicated solely to the management of this program. The program consists of three age-appropriate financial literacy programs that are used in conjunction with the local school systems and community organizations to promote financial literacy and smart personal banking. The majority of the students benefiting from the financial literacy education program are from low- or moderate-income families.

OVB's staff provides leadership through their involvement with community development organizations throughout the assessment areas. Examples of board and committee membership positions held include directors, presidents, vice presidents, treasurers, trustees, and members.

**Fair Lending or Other Illegal Credit Practices Review**

No evidence of discrimination or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**HUNTINGTON-ASHLAND, WV-KY-OH MULTISTATE MSA #26580  
(Full-scope Review)**

**CRA Rating for Huntington-Ashland, WV-KY-OH Multistate MSA #26580:<sup>1</sup> “Satisfactory”**

**The Lending Test is rated: “Satisfactory”**

**The Community Development Test is rated: “Satisfactory”**

The major factors and criteria contributing to this rating include:

- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area;
- A reasonable penetration among individuals of different income (including low- and moderate-income individuals) levels;
- A reasonable level of responsiveness to the community development needs of its assessment area.

**SCOPE OF EXAMINATION**

A full-scope review was conducted for the Huntington-Ashland Multistate MSA. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the institution section of this report.

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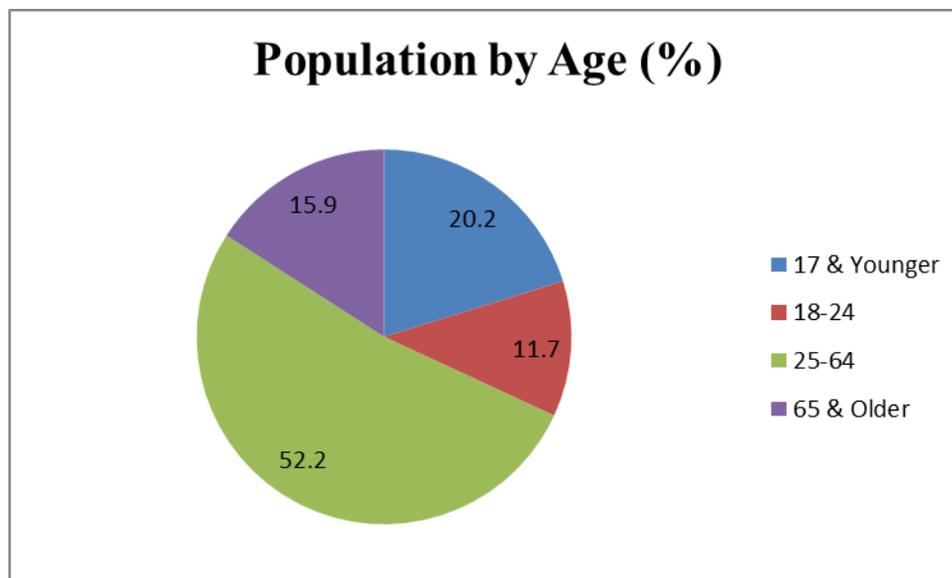
<sup>1</sup>This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN HUNTINGTON-ASHLAND,  
WV-KY-OH MSA #26580**

The Huntington-Ashland WV-KY-OH Multistate MSA is comprised of the entireties of Boyd and Greenup Counties in Kentucky, Lawrence County in Ohio, and Cabell and Wayne Counties in West Virginia. The bank’s assessment area includes Lawrence County in Ohio and Cabell County in West Virginia and is comprised of three low-income tracts, 11 moderate-income tracts, 12 middle-income tracts, and six upper-income tracts. During the evaluation period, OVB originated 77 HMDA loans (8.5%), 124 consumer loans (6.2%) and 14 CRA loans (6.4%) of the total loans for the bank. A community contact stated that a large part of the population are living pay check to pay check and there is a need for affordable financing options. The contact also noted that cash advance stores are a major concern for the community and there is a need for financial literacy training for communities.

***Population Characteristics***

According to the U.S. Census, the population in the assessment area was 158,769 in 2010, with 79.8% of the population 18 years of age or older, which is the legal age to enter into a contract.



The following table<sup>2</sup> shows the population by county in the assessment area for 2010 and 2012, with the percentage of the population increase or decrease during that time. Overall, there was a slight increase in population from 2010 to 2012.

County	2010 Population	2012 Population	Population Percent Change
Cabell	96,319	96,974	0.7%
Lawrence	62,450	62,109	-0.5%
<b>Total</b>	<b>158,769</b>	<b>159,083</b>	<b>0.2%</b>

<sup>2</sup> <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>

***Income Characteristics***

According to the U.S. Census, the median family income of the MSA in 2010 was \$48,174, which is lower than Ohio’s and West Virginia’s median family income of \$59,680 and \$48,896, respectively. The median family income of the MSA increased to \$50,800 in 2013.<sup>3</sup>

**Borrower Income Levels  
Huntington-Ashland, WV KY OH - MSA**

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2012</b>	<b>\$50,300</b>	0 - \$25,149	\$25,150 - \$40,239	\$40,240 - \$60,359	\$60,360 - & above
<b>2013</b>	<b>\$50,800</b>	0 - \$25,399	\$25,400 - \$40,639	\$40,640 - \$60,959	\$60,960 - & above

In 2010, the assessment area contained 46,748 households, of which 28,991 (62.0%) were families. Of the total families in the assessment area, 22.6% were low-income, 18.2% were moderate-income, 18.7% were middle-income, and 40.5% were upper-income.

The poverty rate increased in Cabell County to 20.2% from 1999 to 2011<sup>4</sup> and remains higher than the state and national poverty levels at 18.6% and 15.9%, respectively. The poverty rate decreased in Lawrence County to 18.0% which is above Ohio at 16.4% and above the national average of 15.9%. Given the high poverty rates in the area, it is expected that loan demand would be minimal.

County, State	1999 Poverty Rate	2011 Poverty Rate	Change
Lawrence, OH	18.9%	18.0%	-4.8%
Cabell, WV	19.2%	20.2%	5.2%
<b>Ohio</b>	<b>10.6%</b>	<b>16.4%</b>	<b>54.7%</b>
<b>West Virginia</b>	<b>17.9%</b>	<b>18.6%</b>	<b>3.9%</b>
<b>United States</b>	<b>12.4%</b>	<b>15.9%</b>	<b>28.2%</b>

***Housing Characteristics***

There were 52,985 housing units in the assessment area as of the 2010 U.S. Census. The owner-occupancy rate was 57.2%, with 65.3% in Lawrence County and 56.4% in Cabell County. From an income perspective, 30.9% of housing units and 19.6% of owner-occupied units were either in a low- or moderate-income tract. Roughly 36.1% of low-income tracts and 18.3% of moderate-income tracts are comprised of multi-family units. These numbers indicate that demand for single-family home loans would be more concentrated in middle- and upper-income tracts.

<sup>3</sup> <http://portal.hud.gov/hudportal/HUD>

<sup>4</sup> <http://www.ers.usda.gov/data-products/county-level-data-sets/poverty>

As of the 2010 U.S. Census, the median age of the housing stock was 46 years, with 30.4% of the stock built before 1950. The newest housing stock was in Lawrence County with a median age of 37 years, while Cabell County’s median age of housing stock is 47 years.

The median housing value in the assessment area was \$96,782 with an affordability ratio of 35.9%. The affordability ratio in Lawrence County is 39.5%, while Cabell County’s affordability ratio is 35.4%. Based on the 2013 median family income for the MSA, about 76.6% of the homes valued up to \$98,988 would be considered affordable for low-income individuals with an average monthly mortgage payment of approximately \$445/month. Approximately 91.6% of the homes valued up to \$158,381 would be affordable for moderate-income individuals with an average monthly mortgage payment of about \$711.20/month. These percentages were calculated assuming an average mortgage payment equal to 28.0% of gross income for a 3.50% fixed-rate, 30-year loan.

According to RealtyTrac,<sup>5</sup> a leading source for foreclosure information, the following information about foreclosure filings and the number of foreclosure properties in this assessment area is included in the table below:

<b>Geography Name</b>	<b>Foreclosed Properties in March 2014</b>	<b>Ratio of Properties Receiving Foreclosure Filings in March 2014</b>
Cabell County, WV	7	1:6,596
Lawrence County, OH	19	1:1,452
<b>Ohio</b>	<b>7,500</b>	<b>1:663</b>
<b>West Virginia</b>	<b>55</b>	<b>1:16,041</b>
<b>United States</b>	<b>115,000</b>	<b>1:1,121</b>

The lower the second number in the ratio, the higher the foreclosure rate; therefore, Ohio’s foreclosure rate is substantially higher than West Virginia’s. Based on the information available, Lawrence County has a higher foreclosure rate than Cabell County, which is in line with the statistics for all of Ohio and West Virginia.

The median gross rent in the assessment area was \$585 as of 2010. The gross rent for Lawrence County was \$556, while the gross rent for Cabell County was \$590. The lowest rents (those less than \$350) comprised 14.6% of the rental units, while 16.9% of the units had rental costs between \$350 and \$500. Further, 46.4% of renters had rental costs greater than 30.0% of their income. About 57.1% and 43.5% of the housing units in low- and moderate-income tracts are comprised of rental units, respectively. These numbers indicate that demand for single-family home loans would be limited in low- and moderate-income tracts and more concentrated in middle- and upper-income tracts. While rental and mortgage costs are comparable, rental units are more abundant than single-family homes in lower-income areas.

<sup>5</sup> <http://www.realtytrac.com/trendcenter/>

**Labor, Employment, and Economic Characteristics**

The following table shows the primary employment sectors <sup>(6,7)</sup> (by number of persons employed in the county) and major employers for each of the counties in the assessment area.

County	Primary Employment Sectors	Major Employers
Lawrence County (OH)	Trade Transportation and Utilities, Education and Health Services, Local Government, Leisure and Hospitality, Construction, Professional and Business Services.	Dow Chemical Co., Emerson Electric/Liebert Corp., Ironton City Schools, Jo-Lin Health Center, Lawrence County Government, McGinnis Inc., McSweeneys Inc., Ohio University
Cabell County (WV)	Trade Transportation and Utilities, Government, Educational and Health Service, Business and Professional Services, Leisure and Hospitality, Manufacturing	Marshall University, St. Mary's Hospital, Marathon Ashland Petroleum, Cabell-Huntington Hospital, AK Steel, CSX Huntington, Applied Card Systems

The following table illustrates the unadjusted unemployment rates for 2012 and 2013 for the counties in the assessment area, Kentucky, Ohio, and West Virginia.

**Unemployment Rates**  
**Assessment Area: Huntington-Ashland WV KY OH - MSA**

Area	Years - Annualized	
	2012	2013
Lawrence Co., OH	7.6	6.4 (P)
Cabell Co., WV	6.8	4.6 (P)
<b>Kentucky</b>	<b>8.2</b>	<b>7.4 (P)</b>
<b>Ohio</b>	<b>7.2</b>	<b>6.6 (P)</b>
<b>West Virginia</b>	<b>7.3</b>	<b>5.6 (P)</b>
<b>Multi Huntington-Ashland, WV KY OH MSA</b>	<b>7.4</b>	<b>6.1 (P)</b>

Not Seasonally Adjusted

P: Preliminary as of December 2013

The December 2013 unemployment rate for the MSA is 6.1%, which is higher than West Virginia's rate, but lower than Kentucky and Ohio's unemployment rates. As shown above, the unemployment rates in each county have decreased since 2012.

6 [http://development.ohio.gov/reports/reports\\_countytrends\\_map.htm](http://development.ohio.gov/reports/reports_countytrends_map.htm)

7 <http://www.city-data.com/us-cities/The-South/Huntington-Economy.html>

## Combined Demographics Report

Assessment Area(s): Huntington-Ashland MSA 2013

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	9.4	1,091	3.8	493	45.2	6,563	22.6
Moderate-income	11	34.4	5,656	19.5	1,676	29.6	5,264	18.2
Middle-income	12	37.5	15,198	52.4	1,975	13	5,424	18.7
Upper-income	6	18.8	7,046	24.3	510	7.2	11,740	40.5
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>32</b>	<b>100.0</b>	<b>28,991</b>	<b>100.0</b>	<b>4,654</b>	<b>16.1</b>	<b>28,991</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	3,555	754	2.5	21.2	2,028	57	773	21.7
Moderate-income	12,800	5,182	17.1	40.5	5,569	43.5	2,049	16
Middle-income	24,865	16,030	52.9	64.5	6,289	25.3	2,546	10.2
Upper-income	11,765	8,326	27.5	70.8	2,570	21.8	869	7.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>52,985</b>	<b>30,292</b>	<b>100.0</b>	<b>57.2</b>	<b>16,456</b>	<b>31.1</b>	<b>6,237</b>	<b>11.8</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	277	6	232	5.7	32	8.2	13	6.9
Moderate-income	1,516	32.6	1,261	30.9	181	46.5	74	39.4
Middle-income	1,806	38.8	1,629	40	108	27.8	69	36.7
Upper-income	1,054	22.7	954	23.4	68	17.5	32	17
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>4,653</b>	<b>100.0</b>	<b>4,076</b>	<b>100.0</b>	<b>389</b>	<b>100.0</b>	<b>188</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>87.6</b>		<b>8.4</b>		<b>4.0</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	1	1.1	1	1.1	0	0	0	0
Moderate-income	2	2.3	2	2.3	0	0	0	0
Middle-income	65	73.9	64	73.6	1	100	0	0
Upper-income	20	22.7	20	23	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>88</b>	<b>100.0</b>	<b>87</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>98.9</b>		<b>1.1</b>		<b>.0</b>

Based on 2013 D&B information according to 2010 ACSBoundaries.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN HUNTINGTON- ASHLAND, WV-KY-OH MSA #26580

### **Lending Test**

OVB's performance under the Lending Test in this assessment area is rated "Satisfactory." Within the assessment area, OVB has demonstrated an adequate responsiveness to the credit needs of the community. OVB has an adequate geographic distribution of loans in the area and an adequate distribution among borrowers of different income levels. This results in an adequate record of serving the credit needs of highly economically disadvantaged areas in its assessment area and low-income individuals within the assessment area.

Details of the bank's mortgage and consumer lending, as well as information regarding lending by peers, can be found in Appendix B.

### ***Lending Activity***

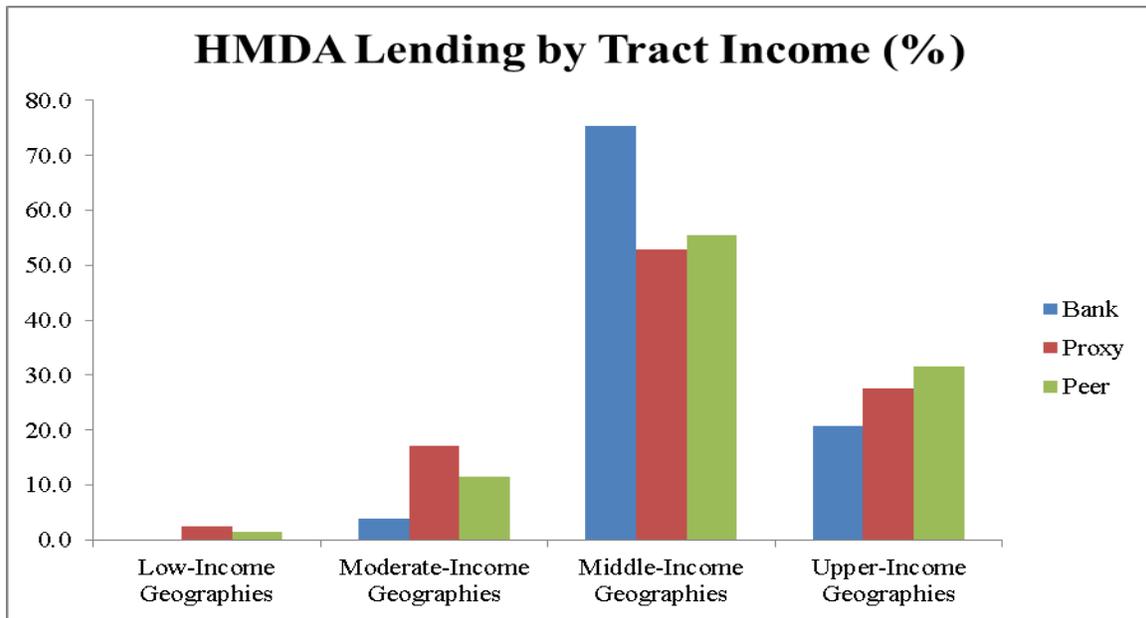
OVB originated 25 home purchase loans, 43 refinance loans, nine home improvement loans, 124 consumer loans, and 14 small business loans during the evaluation period. Small business loans were excluded from the geographic and borrower analysis due to the minimal number of originations.

Overall, low- and moderate income tracts had a higher percentage of tracts without lending (28.6%) compared to middle- and upper-income tracts (11.1%). However, housing stock in low- and moderate-income tracts predominantly consists of rentals, while housing stock in middle- and upper-income tracts consists of owner-occupied units. There are also considerably more vacant units in low- and moderate-income tracts (37.8%) than in moderate- and upper-income tracts (17.6%). Furthermore, the median age of housing stock in low- and moderate-income tracts is 56 and 61, compared to middle- and upper-income tracts at 37 and 43, respectively. In addition, the total housing units in low- and moderate-income tracts is considerably lower than that of middle- and upper income tracts due to the LMI tracts primarily comprising downtown Huntington and Marshall University. These figures could factor into the ability of the bank to originate home purchase, refinance, and home improvement loans in low- and moderate-income tracts.

Furthermore, OVB has three branch offices in this assessment area that are all located in middle- and upper-income tracts. Two of the branch offices are located inside of Walmart stores and do not have lenders present onsite and the third branch is not in close proximity to LMI tracts. This impacts the lending ability of the bank in this assessment area.

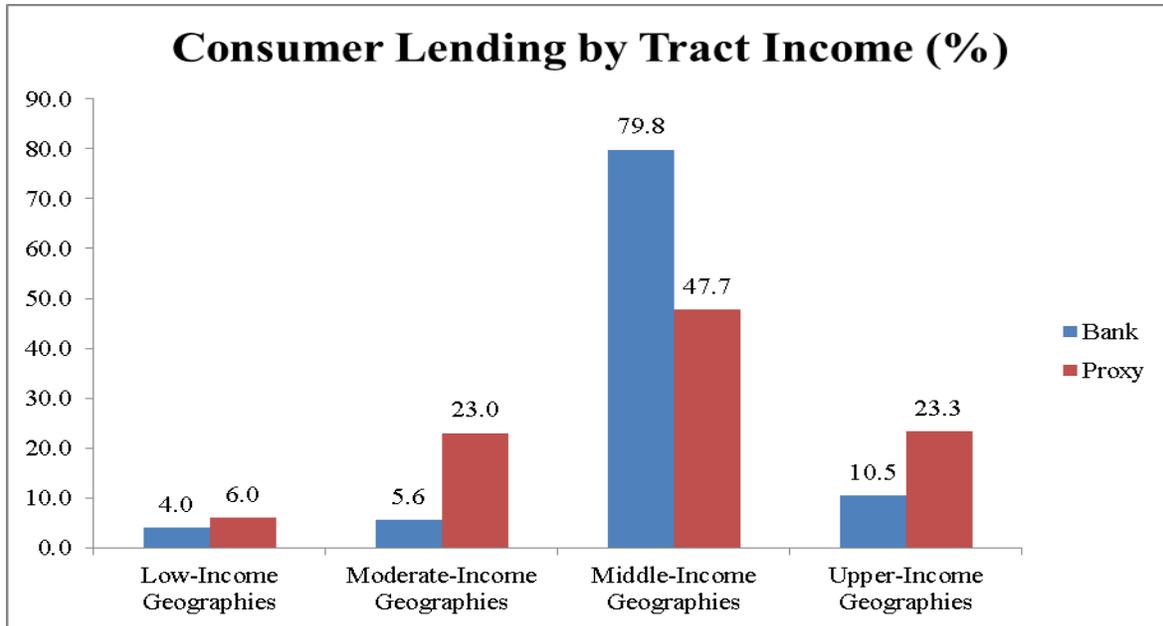
### ***Geographic Distribution***

Overall, OVB's distribution of loans among geographies is considered adequate. As previously mentioned, small business lending was excluded from the evaluation under geographic distribution due to the low loan volume.



As shown in the chart above, the geographic distribution in low-income geographies is lower than proxy and peer. Likewise, the geographic distribution in moderate-income geographies is lower than proxy and peer. As previously stated, the bank's branch offices are located in middle- and upper-income tracts in this assessment area. In addition, two of the branch offices are physically located inside Walmart stores and do not have lenders present. Through discussions with management it was revealed that OVB has plans to close the Walmart branch offices and open another free standing full-service office in the assessment area. Once the additional free-standing branch is open, the bank expects an increase in HMDA lending.

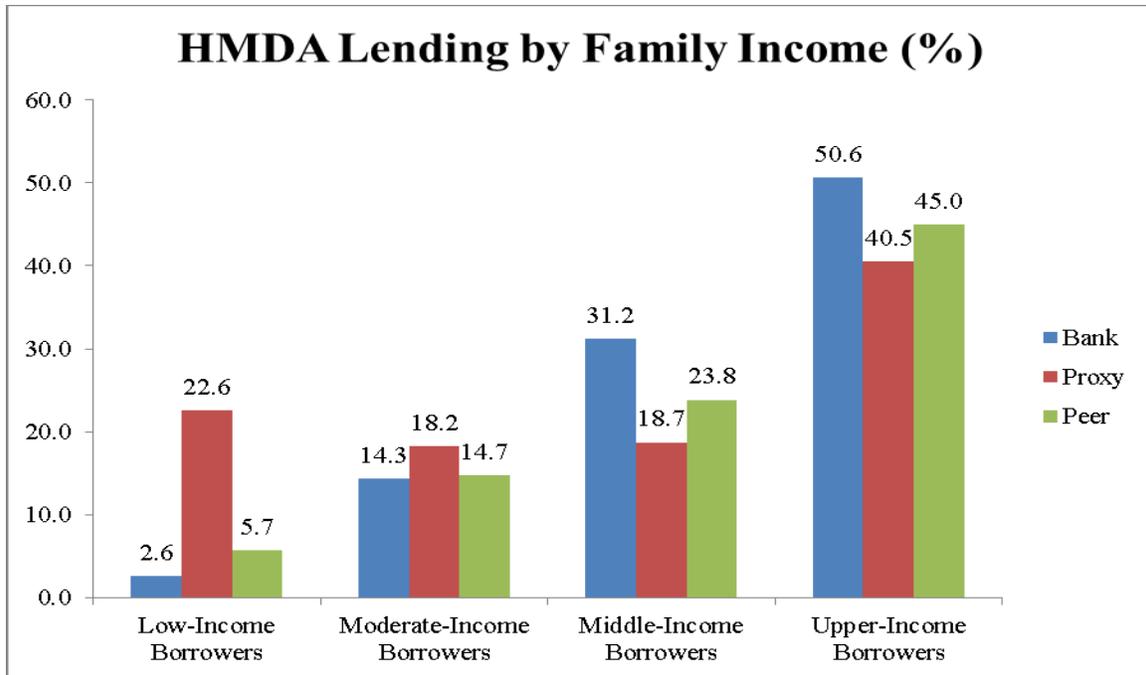
Moreover, the number of total housing units in low- and moderate-income geographies is less than half of the total housing units in middle- and upper income geographies. Also, the number of rental units available in the low-income geographies doubles that of the owner-occupied units available given the proximity to Marshall University. Given these factors, it is expected that loan demand would be negatively impacted. Therefore, OVB's lending performance is considered adequate.



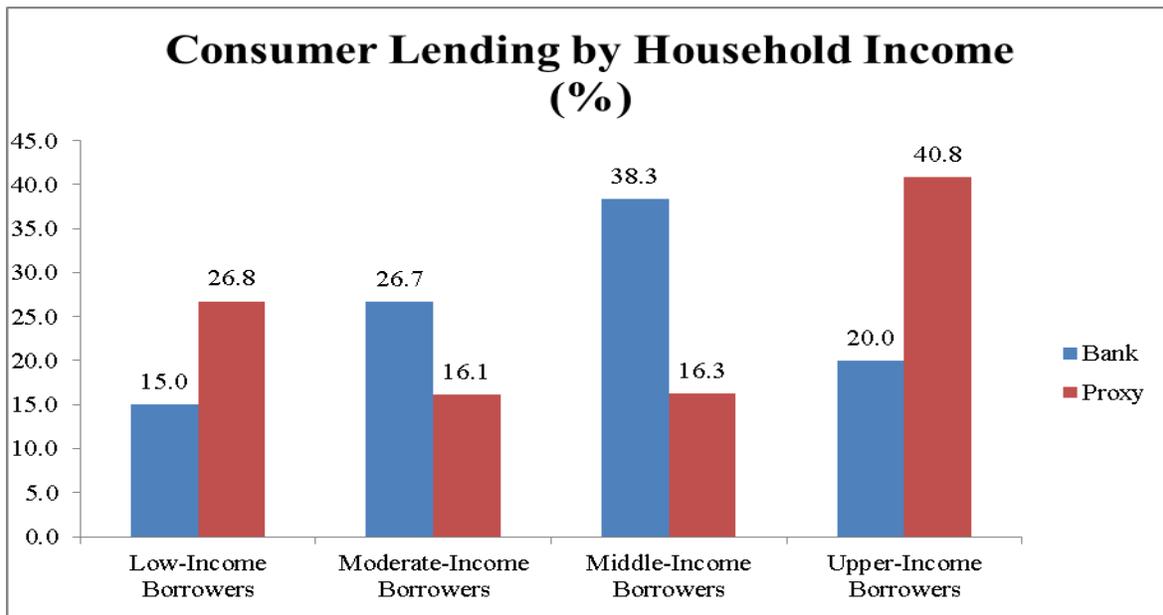
As shown in the chart above, consumer lending in low- and moderate-income geographies is below proxy; however, lending in middle-income geographies is considerably above proxy. As previously noted, the bank only has one free-standing branch located in a middle-income tract, hence the high concentration of consumer lending in the middle-income geography. Based on slightly lower consumer lending in low-income geographies and the high concentration of loans near the only free-standing branch office in the middle-income tract, overall consumer lending is adequate.

### ***Borrower Distribution***

Overall, the distribution of loans based on borrower's income is considered adequate. As previously mentioned, small business lending was excluded from the evaluation under borrower distribution due to the low loan volume.



As shown in the chart above, HMDA lending to low-income borrowers is significantly below proxy and slightly below peer. HMDA lending to moderate-income borrowers is slightly lower than proxy and peer. The high poverty rates in the assessment area could have an impact on the lack of HMDA lending to low- and moderate-income borrowers. The bank exceeds proxy and peer for HMDA lending for middle- and upper-income borrowers.



As shown in the chart above, consumer lending to low-income borrowers is below proxy and consumer lending to moderate-income borrowers is above proxy.

The percentages reflected in the chart are adjusted to remove 64 loans in which the household income of the borrower was unknown.

### **Community Development Activities**

#### ***Community Development Loans***

OVB made no community development loans in this assessment area.

#### ***Community Development Investments and Donations***

OVB made three investments/donations in this assessment area totaling \$950. Two of the investments were to the local Cabell County law enforcement canine program that provides services that benefit all residents, including LMI individuals. The bank also made a donation to Cabell County Family Resource Network, which provides services for at-risk, LMI high school students.

#### ***Community Development Services***

OVB staff offered services to the Symmes Valley Local School District. A senior vice president of the bank serves on the Audit Committee of the school district, which serves low- and moderate-income students.

## STATE OF OHIO

**CRA RATING FOR State of Ohio: “Satisfactory”**

**The Lending Test is rated: “Satisfactory”**

**The Community Development Test is rated: “Satisfactory”**

The major factors and criteria contributing to this rating include:

- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area;
- A reasonable penetration among individuals of different income (including low- and moderate-income individuals) levels and businesses of different revenue sizes;
- A reasonable level of responsiveness to the community development needs of its assessment area.

## SCOPE OF EXAMINATION

A full-scope review was conducted for the Non-metropolitan Ohio (Non-MSA Ohio) assessment area, which comprises the entirety of the State of Ohio CRA rating. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the institution section of this report.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN OHIO

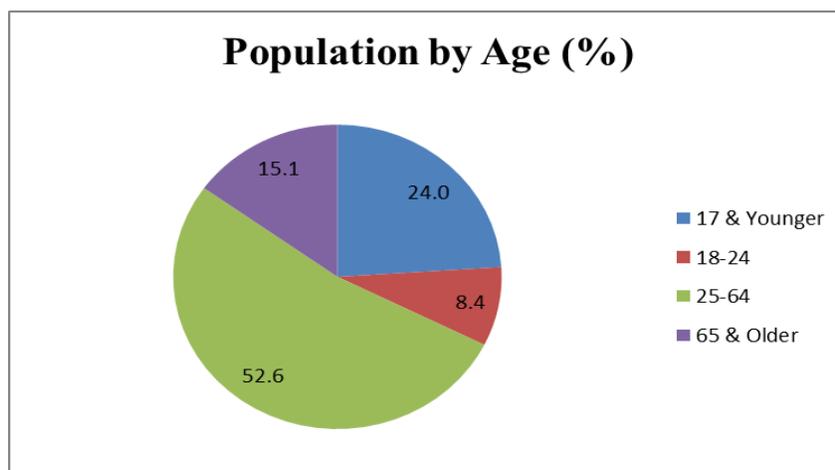
Non-MSA OH consists of the entireties of Gallia, Jackson, Meigs, and Pike Counties. The bank's assessment area is comprised of 11 moderate-income tracts and 15 middle-income tracts. Five of 15 (33.3%) middle-income tracts are considered distressed during this evaluation period. OVB had 25.9% of the deposits in this assessment area as of June 30, 2013<sup>8</sup> and is ranked first out of 15 institutions in this market. Wesbanco Bank, Inc. and U.S. Bank National Association had the second and third highest shares with 14.3% and 10.4%, respectively.

During the evaluation period, OVB originated 550 HMDA loans (61.0%), 1,218 consumer loans (61.3%) and 145 small business loans (65.9%) of the total loans for the bank. The Non-MSA OH assessment area represents the highest percentage of lending of all three assessment areas.

One community contact was conducted to provide additional information regarding the assessment area. The contact represented an economic development association. The contact indicated that housing in the area is insufficient, as the majority of the housing is old and very little new construction is available for lower- and higher-income earners. The contact also stated that there has been considerable growth in the amount of mobile homes being used as primary housing in the area. Therefore, there is a need for new home construction and new homebuyer education to assist residents in the homebuying process. In addition, the contact stated that local financial institutions have been very helpful in assisting small businesses with financing. Local bankers also have a high level of involvement in the community, serving on boards for local agencies and providing donations to local organizations.

### *Population Characteristics*

According to the U.S. Census Tract, the population in the assessment area was 116,638 in 2010, with about 40.6% of the population living in moderate-income tracts. In addition, 76.0% of the population was 18 years of age or older, which is the legal age to enter into a contract.



<sup>8</sup> <http://www2.fdic.gov/sod/sodMarketBank2.asp>

The following table<sup>9</sup> shows the population by county in the assessment area for 2000 and 2010, with the percentage of the population increase or decrease during that time. Overall, there was a decrease in population from 2010 to 2012 for all of the counties.

County Name	2010 Population	2012 Population	Percentage Change from 2010 to 2012
Gallia	30,934	30,708	-0.7
Jackson	33,225	32,954	-0.8
Meigs	23,770	23,593	-0.7
Pike	28,709	28,480	-0.7

***Income Characteristics***

According to the U.S. Census, the median family income in 2010 was \$43,792, which was lower than Ohio’s median family income of \$59,680. The median family incomes<sup>10</sup> ranged from \$42,560 in Jackson County to \$46,470 in Gallia County.

**Borrower Income Levels  
Ohio State Non-Metro**

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2012</b>	<b>\$53,600</b>	0 - \$26,799	\$26,800 - \$42,879	\$42,880 - \$64,319	\$64,320 - & above
<b>2013</b>	<b>\$53,000</b>	0 - \$26,499	\$26,500 - \$42,399	\$42,400 - \$63,599	\$63,600 - & above

In 2010, the assessment area contained 45,669 households, of which 31,523 (69.0%) were families. Of the total families in the assessment area, 29.4% were low-income, 17.7% were moderate-income, 19.9% were middle-income, and 33.0% were upper-income. Meigs County had the highest percentage of low- and moderate-income families at 48.8%.

County	2011 Poverty Rate
Gallia	19.78%
Jackson	21.49%
Meigs	18.94%
Pike	22.33%
<b>State Name</b>	<b>13.67%</b>
<b>United States</b>	<b>14.43%</b>

<sup>9</sup> <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>

<sup>10</sup> <http://portal.hud.gov/hudportal/HUD>

In 2012, the poverty rate<sup>11</sup> in the assessment area was 22.1%, which is considerably higher than that of Ohio at 16.2%. The poverty rate in the assessment area ranged from 21.0% to 23.2%, with Pike County having the highest poverty rate. Given the high poverty rates in the area, it is expected that loan demand would be marginal.

***Housing Characteristics***

There were 52,077 housing units in the assessment area as of the 2010 U.S. Census. The owner-occupied rate was 63.8%. From an income perspective, 40.5% of housing units and 40.4% of owner-occupied units were in moderate-income tracts.

As of the 2010 U.S. Census, the median age of the housing stock was 35 years, with 23.2% of the stock built before 1950. The newest housing stock was in Pike County, with a median age of 35 years, while the oldest was in Meigs County with a median age of 38 years. As noted earlier discussion with a community contact indicated that there could be a need for newer housing or home improvement loans within the assessment area since the age of the housing stock is older.

The median housing value in this assessment area was \$89,679. Based on the 2010 median family income for this area, about 64.7% of the homes valued up to \$85,332.23 would be considered affordable for low-income individuals, while approximately 87.3% of the homes valued up to \$136,531.58 would be affordable for moderate-income individuals. These percentages were calculated assuming an average mortgage payment equal to 28.0% of gross income for a 3.50% fixed-rate, 30-year loan.

According to RealtyTrac,<sup>12</sup> a leading source for foreclosure information, the following information about foreclosure filings and the number of properties in foreclosure in this assessment area is included in the table below:

<b>County Name</b>	<b>Foreclosed Properties in April 2014<sup>13</sup></b>	<b>Ratio of Properties Receiving Foreclosure Filings in April 2014</b>
Gallia	1	1:6,993
Jackson	4	1:2,742
Meigs	2	1:880
Pike	6	1:1,830
<b>Ohio</b>	<b>7,000</b>	<b>1:750</b>
<b>United States</b>	<b>115,000</b>	<b>1:1,137</b>

The lower the second number in the ratio, the higher the foreclosure rate. Therefore, based on the information available, Meigs County has the highest foreclosure rate and Gallia County has the lowest foreclosure rate in this assessment area.

11 <http://www.ers.usda.gov/data-products/county-level-data-sets/poverty.aspx>

12 <http://www.realtytrac.com/trendcenter/>

13 Foreclosed Properties in April 2014 are estimates.

The median gross rent in the assessment area was \$546 as of 2010. The lowest median gross rent was \$498 in Meigs County. The lowest rents (those less than \$350) comprised 14.3% of the rental units, while 19.5% of units had rental costs between \$350 and \$500. Further, 44.5% of renters had rental costs greater than 30.0% of their income. About 23.8% of the housing units in moderate-income tracts are comprised of rental units. These numbers indicate that demand for single-family home loans could be concentrated in middle-income tracts.

***Labor, Employment, and Economic Characteristics***

Major employers<sup>14</sup> in this assessment area include, but are not limited to the following:

County	Primary Employment Sectors	Major Employers
Gallia	Education and Health Services, Trade Transportation and Utilities, Local Government, Leisure and Hospitality, Manufacturing, State Government	American Electric Power, DMI Technology/ ElectroCraft, Gallia County Local Schools, Gallipolis City Schools, GKN Sinter Metals, Holzer Clinic, Holzer Medical Center, Infocision Management Corp, Ohio Valley Bank
Jackson	Manufacturing, Trade Transportation and Utilities, Local Government, Education and Health Services, Leisure and Hospitality, Professional and Business Services	Bellisio Foods Inc., General Mills Inc., Holzer Medical Center, Jackson City Schools, Masco Corp/ Merillat Inds Inc., Osco Industries Inc., Walmart Stores Inc., Wellston City Schools
Meigs	Local Government, Trade Transportation and Utilities, Education and Health Services, Leisure and Hospitality, Natural Resources and Mining, Construction	Eastern Local Schools, Extendicare/ Rocksprings Rehab Ctr., Gatling Ohio LLC, Meigs County Govt, Meigs Local Schools, Overbrook Rehab Center, Southern Local Schools
Pike	Manufacturing, Education and Health Services, Trade Transportation and Utilities, Local Government, Professional and Business Services, Leisure and Hospitality	Eastern Local Schools, Ohio Valley Electric Corp., Pike Community Hospital, Pike County Government, Pike County JVS, Scioto Valley Local Schools, USEC/ United State Enrichment Corp., Wal-Mart Stores Inc.

The following table illustrates the unadjusted unemployment rates for 2010, 2011, and July 2012 for the counties in the assessment area, Kentucky, and the nation.

<sup>14</sup> [http://development.ohio.gov/reports/reports\\_countytrends\\_map.htm](http://development.ohio.gov/reports/reports_countytrends_map.htm)

**Unemployment Rates**  
**Assessment Area: Ohio Non MSA**

Area	Years - Annualized	
	2012	2013
Gallia Co.	8.9	8.1 (P)
Jackson Co.	9.2	8.5 (P)
Meigs Co.	11.8	10.9 (P)
Pike Co.	12.9	11.7 (P)
<b>Ohio</b>	<b>7.2</b>	<b>6.6 (P)</b>

Not Seasonally Adjusted

P: Preliminary as of December 2013

As shown above, the unemployment rates in every county decreased since 2012. As of December 2013, Pike County has the highest unemployment rate, while Gallia County has the lowest unemployment rate. Based on 2013 U.S. Census data, Pike County's unemployment percentage of 11.7% is considered distressed, as it is greater than 1.5 times the national<sup>15</sup> average of 7.4%.

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<sup>15</sup> <http://www.bls.gov/cps/>

## Combined Demographics Report

Assessment Area(s): Ohio Non MSA 2013

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	9,278	29.4
Moderate-income	11	42.3	12,890	40.9	2,470	19.2	5,592	17.7
Middle-income	15	57.7	18,633	59.1	2,937	15.8	6,263	19.9
Upper-income	0	0	0	0	0	0	10,390	33
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>26</b>	<b>100.0</b>	<b>31,523</b>	<b>100.0</b>	<b>5,407</b>	<b>17.2</b>	<b>31,523</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	21,112	13,429	40.4	63.6	5,024	23.8	2,659	12.6
Middle-income	30,965	19,790	59.6	63.9	7,426	24	3,749	12.1
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>52,077</b>	<b>33,219</b>	<b>100.0</b>	<b>63.8</b>	<b>12,450</b>	<b>23.9</b>	<b>6,408</b>	<b>12.3</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,743	37.7	1,569	37.2	81	37	93	47.9
Middle-income	2,884	62.3	2,645	62.8	138	63	101	52.1
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>4,627</b>	<b>100.0</b>	<b>4,214</b>	<b>100.0</b>	<b>219</b>	<b>100.0</b>	<b>194</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>91.1</b>		<b>4.7</b>		<b>4.2</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	236	45.6	235	45.5	1	50	0	0
Middle-income	282	54.4	281	54.5	1	50	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>518</b>	<b>100.0</b>	<b>516</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>99.6</b>		<b>.4</b>		<b>.0</b>	

Based on 2013 D&B information according to 2010 ACSBoundaries.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN OHIO

### **Lending Test**

Within the assessment area, the bank's lending levels reflect a good responsiveness to the credit needs of the community. OVB has an adequate geographic distribution of loans in the area and an adequate distribution among borrowers of different income levels and to businesses of different revenue sizes. This results in an adequate record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses with gross annual revenues of \$1 million or less, consistent with safe and sound operations.

Details of the bank's mortgage, consumer and small business lending, as well as information regarding lending by peers, can be found in Appendix B.

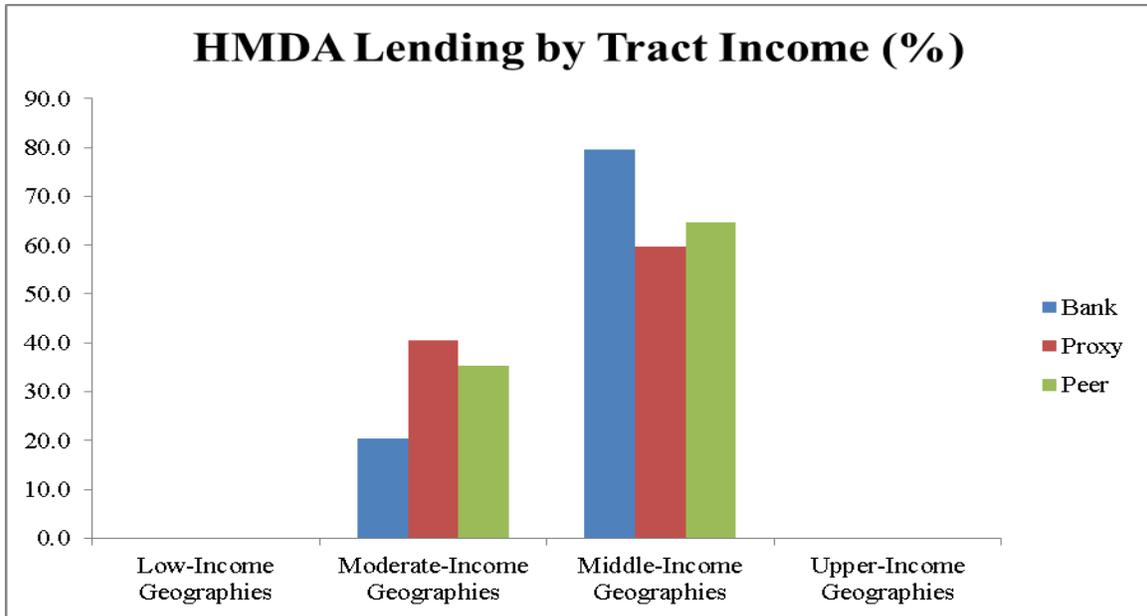
### ***Lending Activity***

OVB originated 219 home purchase loans, 240 refinance loans, 88 home improvement loans, 1,218 consumer loans, and 145 small business loans during the evaluation period. No significant gaps in lending were noted. During the evaluation period, OVB originated loans in 100.0% of the census tracts within the assessment area.

OVB made loans in all of the moderate- and middle-income tracts, which is noteworthy since 33.3% of the middle-income tracts in 2013 were considered to be distressed geographies and 60.0% of the middle-income tracts in 2012 were considered to be distressed geographies.

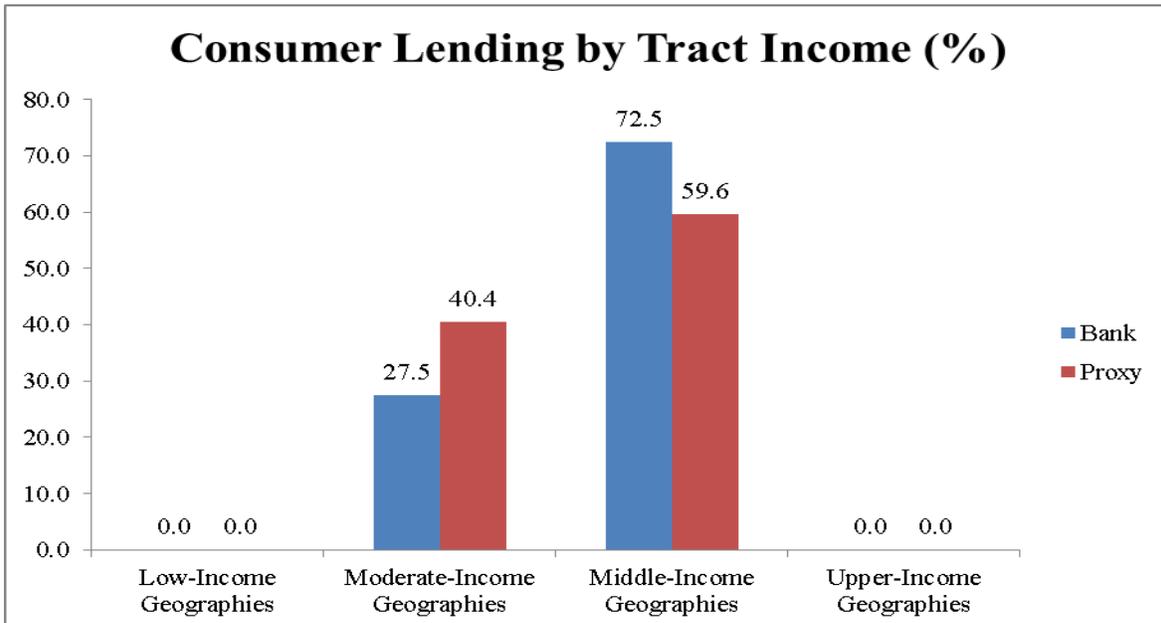
### ***Geographic Distribution***

Overall, OVB's distribution of loans among geographies is considered adequate. HMDA and consumer loans, which received greater weight than small business, were considered adequate and small business loans were also considered adequate.

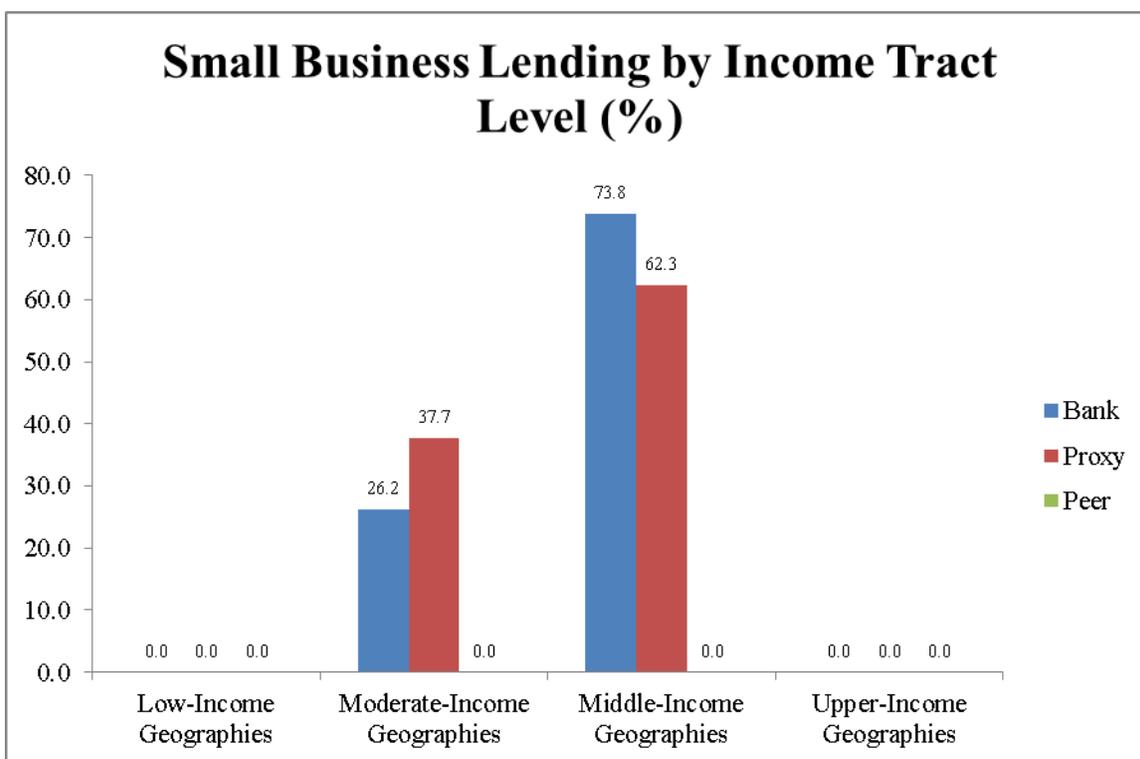


As shown in the chart above, the geographic distribution of HMDA lending in moderate-income geographies is below proxy and peer, while the geographic distribution in middle-income geographies is above both proxy and peer.

As previously stated, it is significant to note the bank's high lending numbers in middle-income geographies that are distressed in 33.3% of the tracts due to unemployment. In addition, given the high poverty rates in the area, it is expected that loan demand would be negatively impacted. Therefore, OVB's HMDA lending performance is considered adequate.



As shown in the previous chart, OVB’s consumer lending in moderate-income geographies is below proxy, while consumer lending in middle-income geographies is above proxy. As previously explained in the HMDA lending graphic, the bank has high lending numbers in middle-income geographies that are distressed in 33.3% of the tracts due to unemployment. Along with the high poverty statistics for the assessment area, marginal consumer lending in moderate-income tracts is expected. Therefore, OVB’s consumer lending performance is considered adequate.

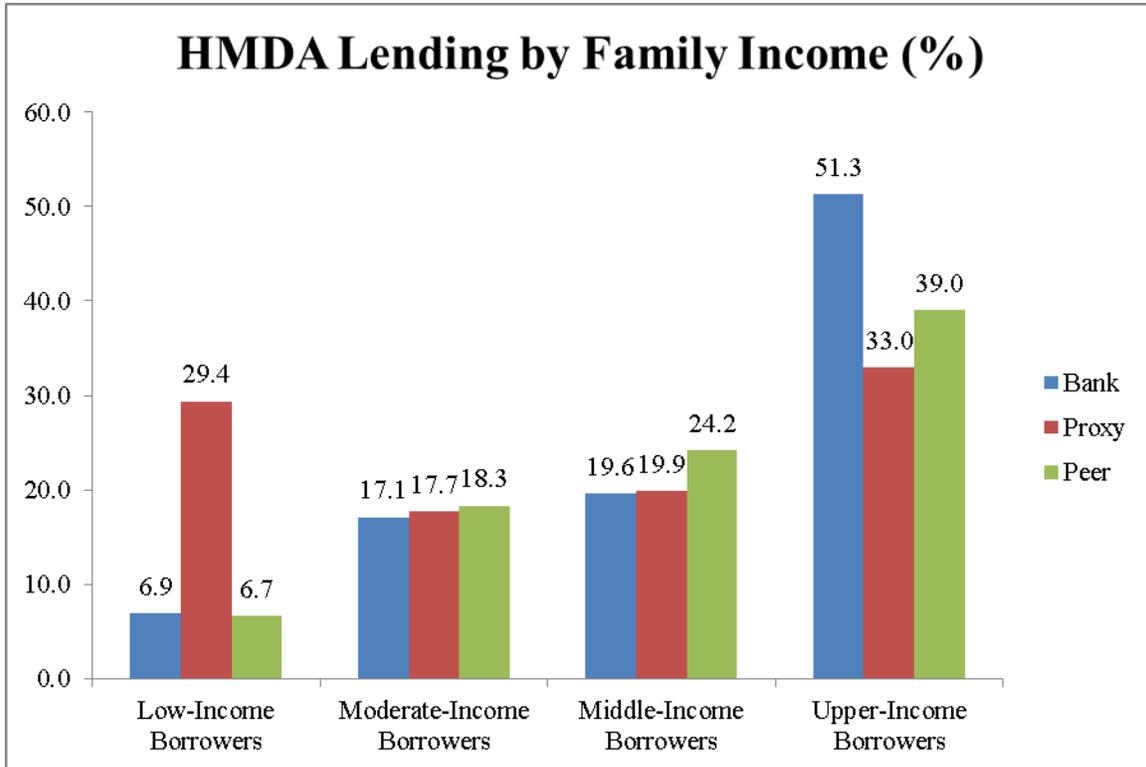


As shown in the chart above, OVB’s small business lending in moderate-income geographies is below proxy, while small business lending in middle-income geographies is above proxy. As previously explained in the HMDA and consumer lending graphics, the bank has high lending numbers in middle-income geographies that are distressed in 33.3% of the tracts due to unemployment. In addition, the bank’s lending numbers are in line with the bank’s branch distribution within the assessment area. Of OVB’s 10 branch offices within the assessment area, 20.0% are located in moderate-income tracts and 80.0% are located in middle-income tracts. Given these facts, it is expected that small business lending would be slightly lower in the moderate-income tracts. Therefore, small business lending is considered adequate.

***Borrower Distribution***

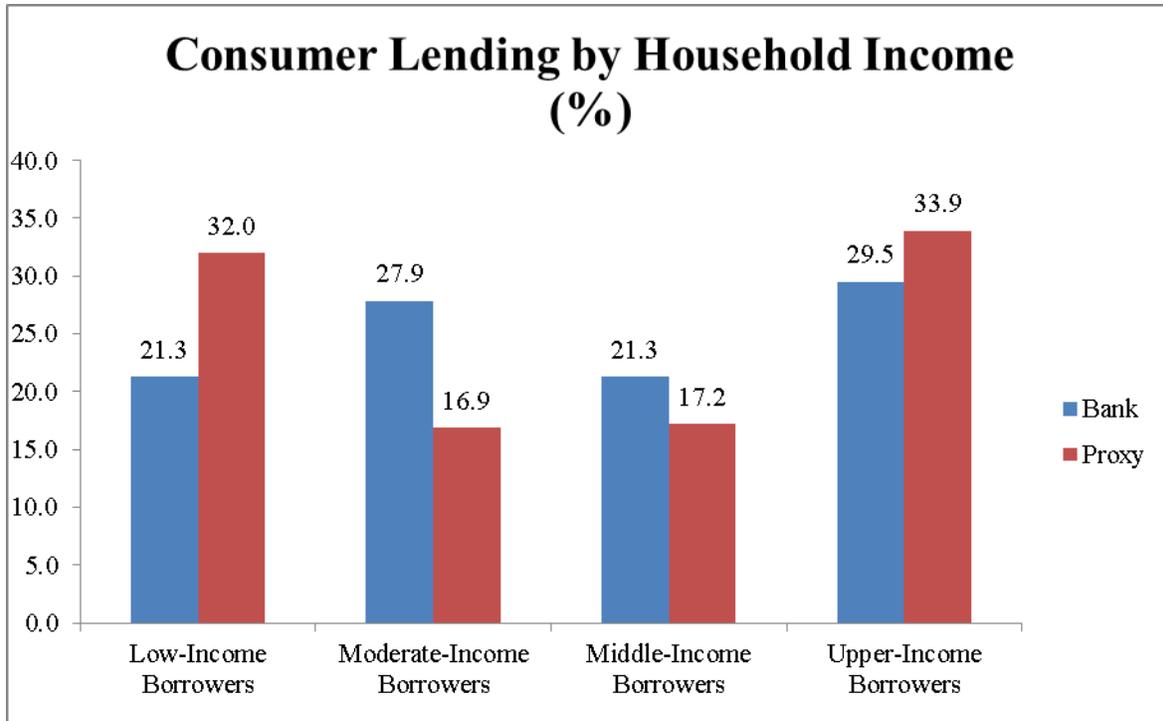
Overall, the distribution of loans based on borrower’s income is adequate. Roughly 20.7% of households in the assessment area are living below the poverty level compared to the state of Ohio’s average of 13.7%. Given the high poverty rates in the area, it is expected that loan demand would be depressed.

Although poverty level is determined by family size and income, households below the poverty level are found throughout the moderate- and middle-income tracts with 42.8% and 57.2%, respectively. HMDA and consumer loans, which received greater weight than small business, were considered adequate and small business loans were also considered adequate.

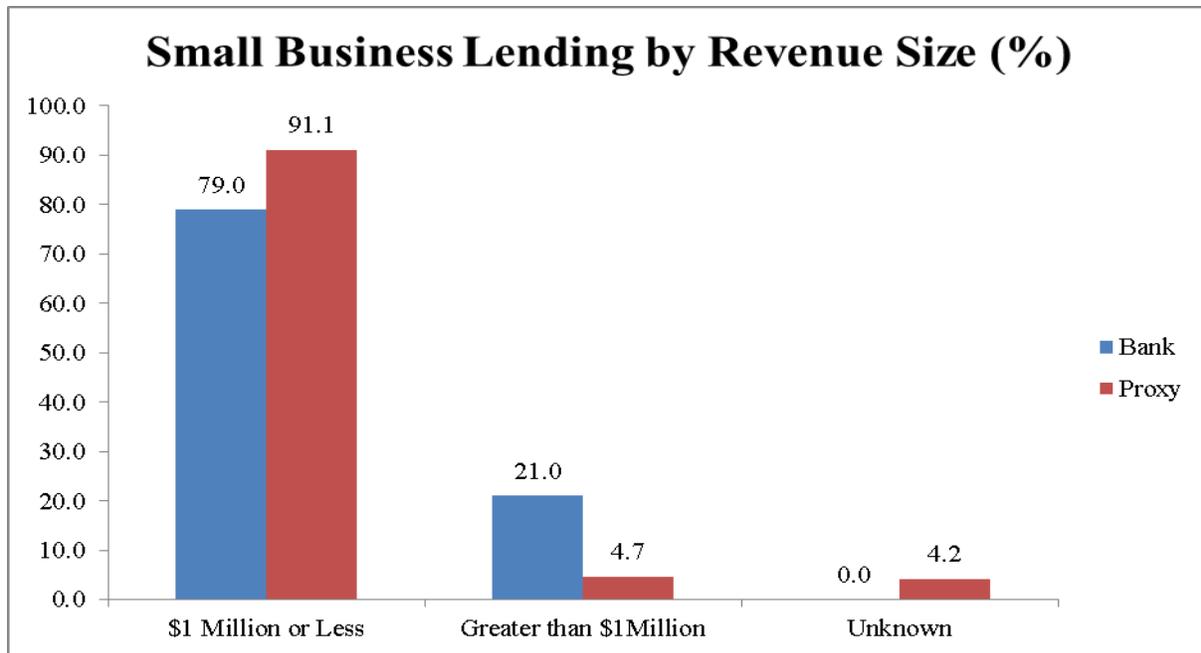


As shown in the chart above, the borrower distribution of HMDA lending to low-income borrowers is substantially below the percentage of families (proxy), but above the aggregate of all lenders (peer). HMDA lending to moderate-income borrowers is slightly below proxy and peer.

Based on the 2010 median family income for this area, about 64.7% of the homes valued up to \$85,332.23 would be considered affordable for low-income individuals, while approximately 87.3% of the homes valued up to \$136,531.58 would be affordable for moderate-income individuals. This could factor into the higher HMDA lending to moderate-income borrowers.



As shown in the chart above, the borrower distribution of consumer lending to low-income borrowers is below the percentage of families in the assessment area (proxy), while consumer lending to moderate-income borrowers is above proxy. The figures above have been adjusted to remove the 1,157 loans (95.0%) with unknown borrower incomes. While consumer lending to low-income borrowers is below proxy, the high percentage of unknown borrower incomes could have a considerable impact on the total outcome of consumer lending in the assessment area.



As shown in the previous chart, 79.0% of the small business loans were originated to businesses with less than \$1 million in revenue, which is less than the 91.1% of small businesses in the assessment area. Further analysis of small business lending shows 73.8% of the bank's small business loans were for \$100,000 or less. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. In addition, through discussions with the community contact for this assessment area, it was noted that OVB has been instrumental in providing assistance to small businesses in the area. This demonstrates a good responsiveness to meeting the credit needs of small businesses in this area.

### **Community Development Activities**

#### ***Community Development Loans***

OVB made five community development loans totaling \$3.8 million under the Federal Home Loan Bank's Economic Development Advance Program. Four of the loans were made to local school districts within the assessment area that primarily serve students from low- to moderate-income households. One loan was made for improvements to a local airport in order to revitalize a middle-income tract that is considered distressed due to the unemployment statistics.

#### ***Community Development Investments and Donations***

OVB made 12 investments and donations totaling \$45,750 in this assessment area. The largest investment (\$30,000) was to a local homeless and battered women's shelter in order to keep the shelter from closing.

The bank also made a donation (\$10,000) to a local high school for school improvement that benefits LMI individuals. OVB also invested \$3,750 in an economic development organization that helps to create jobs for in the assessment area. The remaining \$2,000 was for investments in organizations that focus on healthcare, safety and career services for LMI individuals.

### *Community Development Services*

Overall, OVB provides a high level of community development services in the Non-MSA OH assessment area. The institution's directors, officers, and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, and economic development including the financial literacy and board and committee memberships discussed under the institution rating.

## STATE OF WEST VIRGINIA

**CRA RATING FOR State of West Virginia: “Satisfactory”**

**The Lending Test is rated: “Satisfactory”**

**The Community Development Test is rated: “Satisfactory”**

The major factors and criteria contributing to this rating include:

- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area;
- A reasonable penetration among individuals of different income (including low- and moderate-income individuals) levels;
- A reasonable level of responsiveness to the community development needs of its assessment area.

## SCOPE OF EXAMINATION

A full-scope review was conducted for the Non-metropolitan West Virginia assessment area, which comprises the entirety of the State of West Virginia CRA rating. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the institution section of this report.

## DESCRIPTION OF INSTITUTION’S OPERATIONS IN NON-METROPOLITAN WEST VIRGINIA

Non-MSA WV consists of six tracts in Mason County. The bank’s assessment area is comprised of one moderate-income tract, four middle-income tracts, and one upper-income tract. OVB had 4.4% of the market share as of June 30, 2013<sup>16</sup> and is seventh of 15 institutions in this market. Huntington Federal Savings Bank and Branch Banking and Trust Bank had the first and second highest shares with 15.7% and 15.6%, respectively. During the evaluation period, OVB originated 141 HMDA loans (15.6%), 238 consumer loans (12.0%) and 19 small business loans (8.6%) of the total loans for the bank.

### *Population Characteristics*

According to the U.S. Census, the population in the assessment area was 27,324 in 2010, with about 10.2% of the population living in moderate-income tracts. In addition, 78.3% of the population was 18 years of age or older, which is the legal age to enter into a contract. The population in 2012 fell to 27,179, which was a 0.5% decrease in the population since 2010.

### *Income Characteristics*

According to the U.S. Census Tract, in 2010, the median family income was \$41,956, which was lower than West Virginia’s median family income of \$48,896.

**Borrower Income Levels  
West Virginia State Non-Metro**

HUD Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2012</b>	<b>\$45,400</b>	0	- \$22,699	\$22,700	- \$36,319	\$36,320	- \$54,479	\$54,480	- & above
<b>2013</b>	<b>\$46,100</b>	0	- \$23,049	\$23,050	- \$36,879	\$36,880	- \$55,319	\$55,320	- & above

In 2010, the assessment area contained 10,932 households, of which 7,594 (69.5%) were families. Of the total families in the assessment area, 21.8% were low-income, 18.5% were moderate-income, 19.9% were middle-income, and 39.8% were upper-income.

In 2012, the poverty rate<sup>17</sup> in the assessment area was 19.7%, which is higher than that of West Virginia at 18.0%. Given the high poverty rates in the area, it is expected that loan demand would be marginal.

16 <http://www2.fdic.gov/sod/sodMarketBank2.asp>

17 <http://www.ers.usda.gov/data-products/county-level-data-sets/poverty.aspx>

### *Housing Characteristics*

There were 12,893 housing units in the assessment area as of the 2010 U.S. Census. The owner-occupied rate was 66.2%. From an income perspective, 10.3% of housing units and owner-occupied units were in moderate-income tracts. In addition, of the 12,893 housing units in the assessment area, 22.0% are mobile homes compared to the state average of 14.9%.

As of the 2010 U.S. Census, the median age of the housing stock was 38 years, with 23.2% of the stock built before 1950.

The median housing value in this assessment area was \$79,427. Based on the 2010 median family income for this area, about 61.6% of the homes valued up to \$81,854.63 would be considered affordable for low-income individuals, while approximately 85.7% of the homes valued up to \$130,807.43 would be affordable for moderate-income individuals. These percentages were calculated assuming an average mortgage payment equal to 28.0% of gross income for a 3.50% fixed-rate, 30-year loan.

According to RealtyTrac,<sup>18</sup> a leading source for foreclosure information, the following information about foreclosure filings and the number of properties in foreclosure in this assessment area is included in the table below:

<b>County Name</b>	<b>Foreclosed Properties in April 2014<sup>19</sup></b>	<b>Ratio of Properties Receiving Foreclosure Filings in April 2014</b>
Mason	0	NA
<b>West Virginia</b>	<b>65</b>	<b>1:14,004</b>
<b>United States</b>	<b>115,000</b>	<b>1:1,137</b>

The median gross rent in the assessment area was \$490 as of 2010. The lowest rents (those less than \$350) comprised 18.9% of the rental units, while 20.4% of units had rental costs between \$350 and \$500. Further, 36.7% of renters had rental costs greater than 30.0% of their income. About 18.9% of the housing units in moderate-income tracts are comprised of rental units.

### *Labor, Employment, and Economic Characteristics*

Major employers<sup>20</sup> in this assessment area include, but are not limited to the following:

<sup>18</sup> <http://www.realtytrac.com/trendcenter/>

<sup>19</sup> Foreclosed Properties in April 2014 are estimates.

<sup>20</sup> <http://www.masoncounty.org/local-resources.htm>

County	Primary Employment Sectors	Major Employers
Mason	Electrical, manufacturing, steel production, Education, Trade Transportation and Utilities	AEP Mountaineer Plant, AEP Phillip Sporn Plant, AEP River Operations, Amherst Madison, Bob's Market & Greenhouses, Campbell's Transportation, Felman Productions, Inc., Mason County Board of Education, Appalachian Railcar Services Inc., M&G Polymers USA, LLC., Goodyear Tire and Rubber Company

The following table illustrates the unadjusted unemployment rates for 2012 and 2013 for Mason county and the state of West Virginia.

**Unemployment Rates**  
**Assessment Area: West Virginia Non Metro**

Area	Years - Annualized	
	2012	2013
Mason Co.	11.0	8.7 (P)
<b>West Virginia</b>	<b>7.3</b>	<b>5.6 (P)</b>

Not Seasonally Adjusted

P: Preliminary as of December 2013

As shown in the graphic, Mason County's unemployment rate is considerably higher than that of the state. While the unemployment rate has decreased for both Mason County and West Virginia, Mason County still remains significantly higher than West Virginia.

## Combined Demographics Report

Assessment Area(s): WV Non MSA 2013

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	1,655	21.8	
Moderate-income	1	16.7	811	10.7	255	31.4	1,403	18.5	
Middle-income	4	66.7	5,534	72.9	744	13.4	1,511	19.9	
Upper-income	1	16.7	1,249	16.4	112	9	3,025	39.8	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>6</b>	<b>100.0</b>	<b>7,594</b>	<b>100.0</b>	<b>1,111</b>	<b>14.6</b>	<b>7,594</b>	<b>100.0</b>	
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	1,331		880	10.3	66.1	251	18.9	0	0
Middle-income	9,262		6,223	72.9	67.2	1,479	16	0	0
Upper-income	2,300		1,436	16.8	62.4	663	28.8	0	0
Unknown-income	0		0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>12,893</b>		<b>8,539</b>	<b>100.0</b>	<b>66.2</b>	<b>2,393</b>	<b>18.6</b>	<b>0</b>	<b>.0</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>							
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>			
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	0
Moderate-income	46	6.6	36	5.9	1	3.8	9	13.4	
Middle-income	366	52.4	318	52.5	15	57.7	33	49.3	
Upper-income	287	41.1	252	41.6	10	38.5	25	37.3	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>699</b>	<b>100.0</b>	<b>606</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>67</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>86.7</b>		<b>3.7</b>		<b>9.6</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>							
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>			
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	12	13.2	12	13.2	0	0	0	0	
Middle-income	75	82.4	75	82.4	0	0	0	0	
Upper-income	4	4.4	4	4.4	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>91</b>	<b>100.0</b>	<b>91</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	<b>0</b>	<b>.0</b>	
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>.0</b>		<b>.0</b>	

Based on 2013 D&B information according to 2010 ACSBoundaries.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN WEST VIRGINIA

### Lending Test

Within the assessment area, the bank's lending levels reflect a good responsiveness to the credit needs of the community. OVB has an adequate geographic distribution of loans in the area and an adequate distribution among borrowers of different income levels. This results in an adequate record of serving the credit needs of highly economically disadvantaged areas in its assessment area, including low-income individuals, consistent with safe and sound operations.

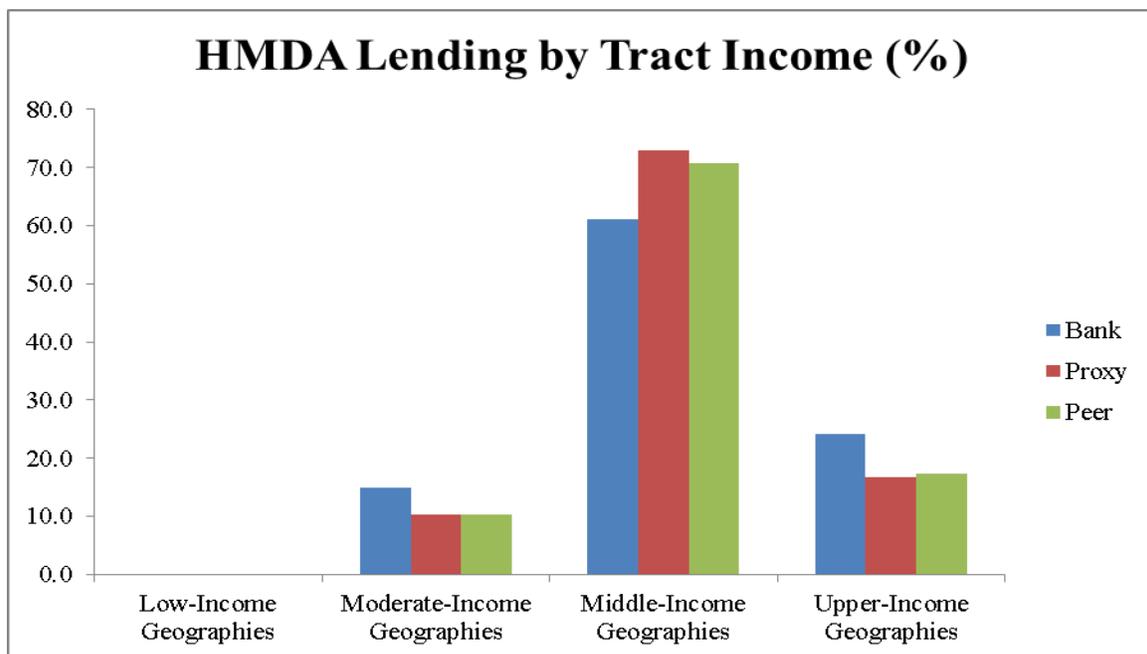
Details of the bank's mortgage and consumer lending, as well as information regarding lending by peers can be found in Appendix B.

### *Lending Activity*

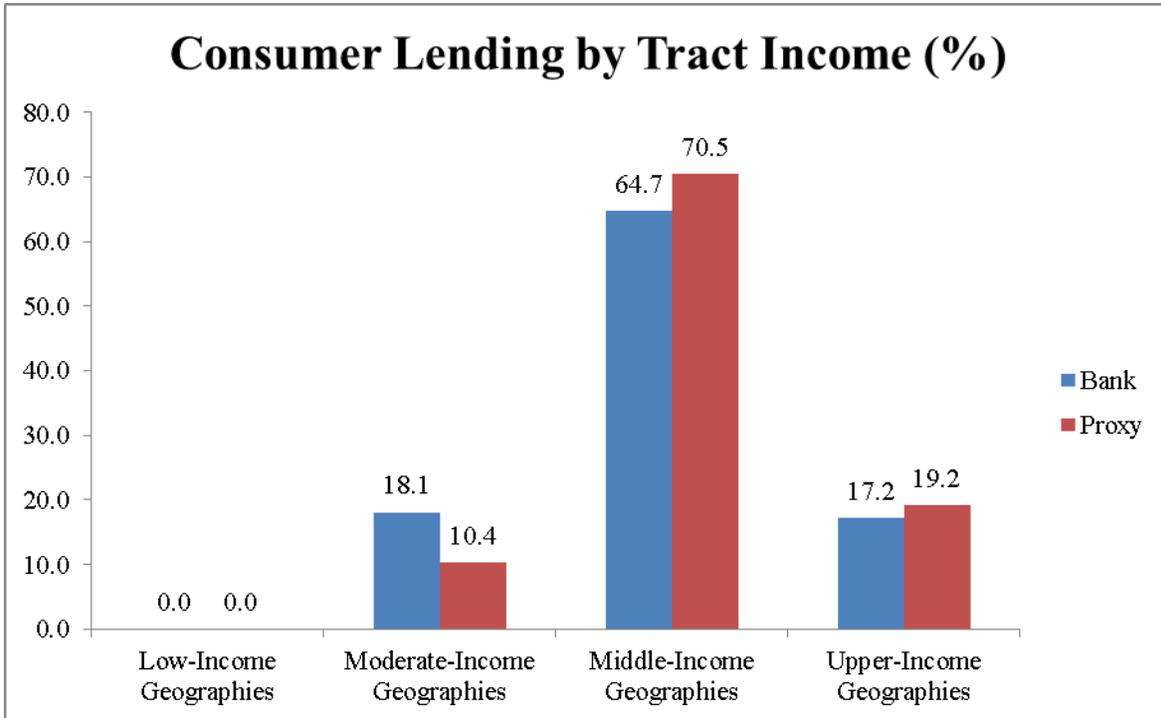
OVB originated 52 home purchase loans, 70 refinance loans, 19 home improvement loans, 238 consumer loans, and 19 small business loans during the evaluation period. Small business loans were excluded from the geographic and borrower analysis due to the minimal number of originations. No significant gaps in lending were noted. During the evaluation period, OVB originated loans in 100.0% of the census tracts within the assessment area.

### *Geographic Distribution*

Overall, OVB's distribution of loans among geographies is considered excellent. HMDA and consumer loans were both considered excellent.



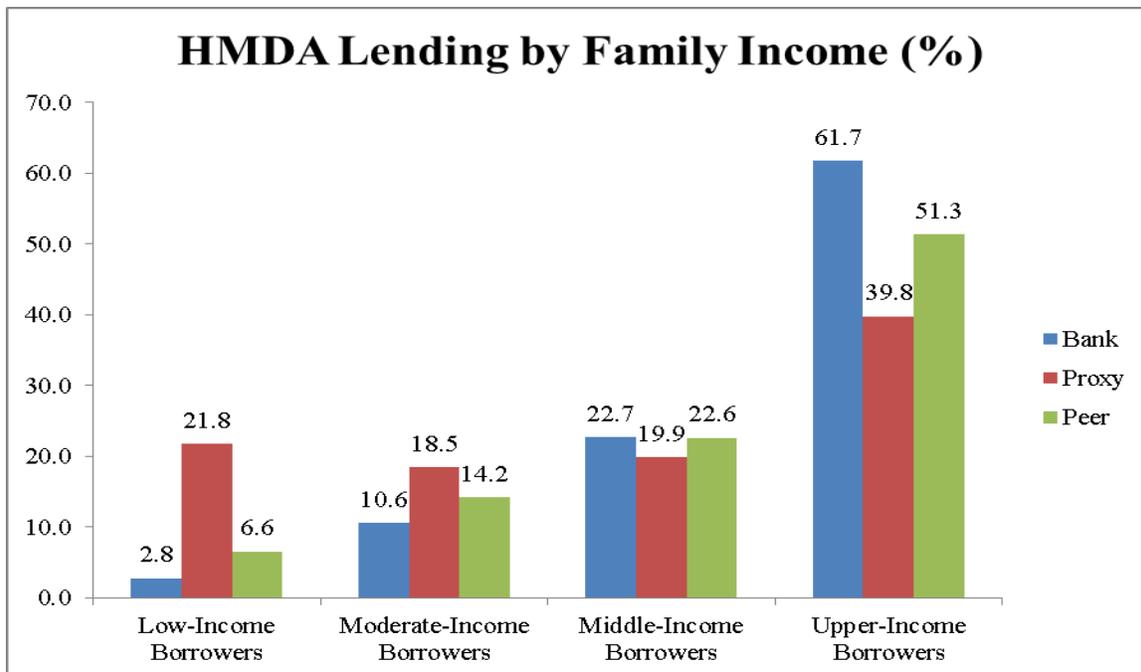
As shown in the previous chart, the geographic distribution of HMDA loans is greater than the proxy and exceeded the peer in the moderate-income geography. As a result, OVB's lending performance is considered excellent.



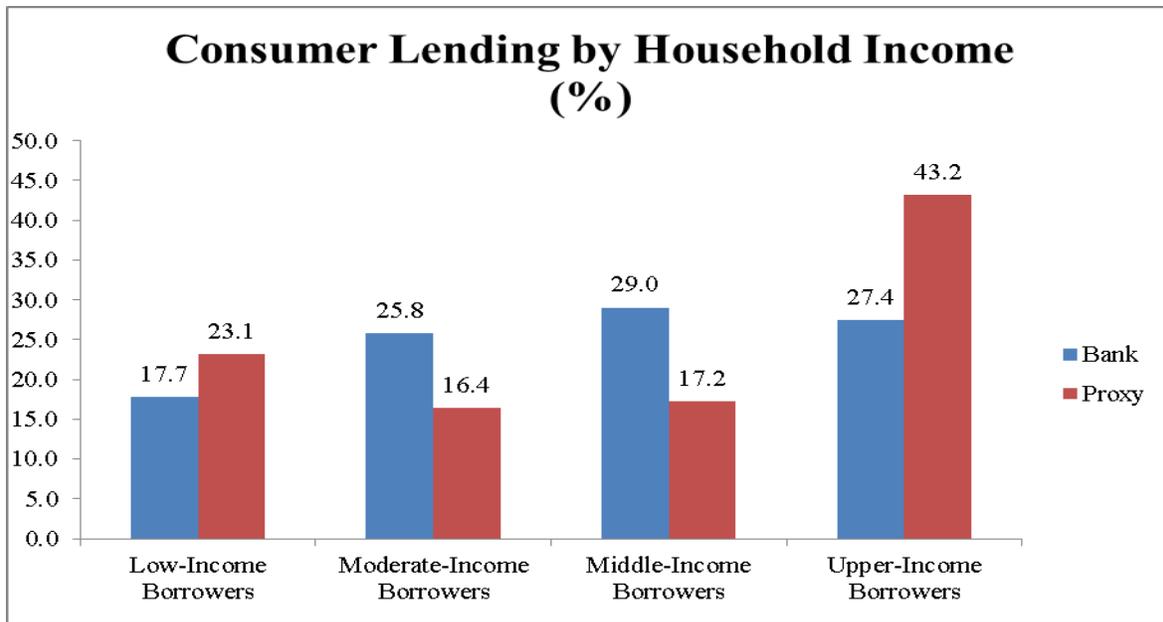
As shown in the previous chart, OVB’s consumer lending in moderate-income geographies exceeds the proxy. Therefore, OVB’s consumer lending performance is considered excellent.

***Distribution of Borrower Income***

Overall, the distribution of loans based on borrower’s income is adequate. Approximately 18.8% of households in the assessment area are living below the poverty level compared to West Virginia’s average of 17.3%. Given the high poverty rates in the area, it is expected that loan demand would be depressed.



As shown in the chart above, HMDA lending to low-income borrowers is significantly below proxy and peer. HMDA lending to moderate-income borrowers is lower than proxy and peer. The bank exceeds proxy and peer for HMDA lending for middle- and upper-income borrowers. Based on the high poverty rates in the assessment area, decreased loan demand is expected.



As shown in the chart above, consumer lending to low-income borrowers is below proxy and consumer lending to moderate-income borrowers is above proxy. The percentages reflected in the chart are adjusted to remove 62 loans in which the household income of the borrower was unknown. As previously mentioned, the high poverty rate in the assessment area could have an impact on loan demand for low-income borrowers.

### **Community Development Activities**

#### ***Community Development Loans***

OVB made no community development loans in this assessment area.

#### ***Community Development Investments and Donations***

OVB invested \$15,000 for Wahama High School, which has a majority LMI students.

#### ***Community Development Services***

The institution's directors, officers, and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, and economic development. Examples of board and committee membership positions held include directors, presidents, vice presidents, treasurers, trustees, and members.

**APPENDIX A**

**SCOPE OF EXAMINATION TABLE**

<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
Huntington-Ashland Multistate MSA	Full-scope review	None	
<b>OHIO</b> Nonmetropolitan Ohio	Full-scope review	Main Office	
<b>WEST VIRGINIA</b> Nonmetropolitan West Virginia	Full-scope review	None	

**APPENDIX B**

**LENDING TABLES**

**HMDA Loan Distribution Table**

Exam: OVB

Assessment Area/Group: Huntington-Ashland MSA 2012 and 2013

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	1	4.0%	50	2.0%
Moderate	2	8.0%	93	3.7%	4	16.0%	276	11.1%
Low/Moderate Total	2	8.0%	93	3.7%	5	20.0%	326	13.1%
Middle	17	68.0%	1,861	74.7%	10	40.0%	1,036	41.6%
Upper	6	24.0%	536	21.5%	10	40.0%	1,128	45.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	2,490	100.0%	25	100.0%	2,490	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	1	2.3%	60	1.2%
Moderate	1	2.3%	19	0.4%	4	9.3%	281	5.5%
Low/Moderate Total	1	2.3%	19	0.4%	5	11.6%	341	6.6%
Middle	35	81.4%	4,232	82.4%	12	27.9%	1,256	24.5%
Upper	7	16.3%	885	17.2%	25	58.1%	3,434	66.9%
Unknown	0	0.0%	0	0.0%	1	2.3%	105	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	5,136	100.0%	43	100.0%	5,136	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	33.3%	46	17.9%
Low/Moderate Total	0	0.0%	0	0.0%	3	33.3%	46	17.9%
Middle	6	66.7%	94	36.6%	2	22.2%	21	8.2%
Upper	3	33.3%	163	63.4%	4	44.4%	190	73.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	257	100.0%	9	100.0%	257	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	2	2.6%	110	1.4%
Moderate	3	3.9%	112	1.4%	11	14.3%	603	7.6%
Low/Moderate Total	3	3.9%	112	1.4%	13	16.9%	713	9.0%
Middle	58	75.3%	6,187	78.5%	24	31.2%	2,313	29.3%
Upper	16	20.8%	1,584	20.1%	39	50.6%	4,752	60.3%
Unknown	0	0.0%	0	0.0%	1	1.3%	105	1.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	77	100.0%	7,883	100.0%	77	100.0%	7,883	100.0%

\*Information based on 2010 ACS data

### Consumer Loan Distribution Table

Exam: OVB

Assessment Area/Group: Huntington-Ashland MSA 2012 and 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Motor Vehicle</b>							
Low	5	4.0%	51	3.6%	9	7.3%	70	5.0%
Moderate	7	5.6%	39	2.8%	16	12.9%	148	10.4%
Low/Moderate Total	12	9.7%	91	6.4%	25	20.2%	218	15.4%
Middle	99	79.8%	1,205	84.9%	23	18.5%	259	18.2%
Upper	13	10.5%	124	8.7%	12	9.7%	161	11.3%
Unknown	0	0.0%	0	0.0%	64	51.6%	781	55.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	124	100.0%	1,419	100.0%	124	100.0%	1,419	100.0%
	<b>Consumer Loan Totals</b>							
Low	5	4.0%	51	3.6%	9	7.3%	70	5.0%
Moderate	7	5.6%	39	2.8%	16	12.9%	148	10.4%
Low/Moderate Total	12	9.7%	91	6.4%	25	20.2%	218	15.4%
Middle	99	79.8%	1,205	84.9%	23	18.5%	259	18.2%
Upper	13	10.5%	124	8.7%	12	9.7%	161	11.3%
Unknown	0	0.0%	0	0.0%	64	51.6%	781	55.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	124	100.0%	1,419	100.0%	124	100.0%	1,419	100.0%

### CRA Loan Distribution Table

Exam: OVB

Assessment Area/Group: Huntington-Ashland MSA 2012 and 2013

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	13	92.9%	2,376	97.7%	0	0.0%	0	0.0%
Upper	1	7.1%	56	2.3%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	2,432	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	14	100.0%	2,432	100.0%	0	0.0%	0	0.0%
Total	14	100.0%	2,432	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	10	71.4%	416	17.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	14.3%	496	20.4%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	7.1%	400	16.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	7.1%	1,120	46.1%	0	0.0%	0	0.0%
Total	14	100.0%	2,432	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Exam ID: OVB

Selected Year: 2012

Huntington-Ashland MSA 2012 Peer

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	14	1.54%	807	0.72%	53	5.84%	3,661	3.28%
Moderate	113	12.46%	9,935	8.89%	174	19.18%	15,113	13.53%
<i>Low/Moderate Total</i>	<u>127</u>	<u>14.0%</u>	<u>10,742</u>	<u>9.62%</u>	<u>227</u>	<u>25.03%</u>	<u>18,774</u>	<u>16.8%</u>
Middle	505	55.68%	63,957	57.25%	244	26.9%	28,521	25.53%
Upper	275	30.32%	37,018	33.14%	333	36.71%	53,784	48.14%
Unknown	0	0.0%	0	0.0%	103	11.36%	10,638	9.52%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>907</b>	<b>100.0%</b>	<b>111,717</b>	<b>100.0%</b>	<b>907</b>	<b>100.0%</b>	<b>111,717</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	17	1.1%	1,633	0.84%	77	4.96%	4,839	2.5%
Moderate	152	9.8%	11,329	5.85%	181	11.67%	14,339	7.4%
<i>Low/Moderate Total</i>	<u>169</u>	<u>10.9%</u>	<u>12,962</u>	<u>6.69%</u>	<u>258</u>	<u>16.63%</u>	<u>19,178</u>	<u>9.9%</u>
Middle	867	55.9%	110,700	57.12%	345	22.24%	31,897	16.46%
Upper	515	33.2%	70,147	36.19%	792	51.06%	118,068	60.92%
Unknown	0	0.0%	0	0.0%	156	10.06%	24,666	12.73%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>1,551</b>	<b>100.0%</b>	<b>193,809</b>	<b>100.0%</b>	<b>1,551</b>	<b>100.0%</b>	<b>193,809</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	8	2.75%	296	1.87%	27	9.28%	695	4.4%
Moderate	46	15.81%	1,877	11.88%	54	18.56%	1,918	12.14%
<i>Low/Moderate Total</i>	<u>54</u>	<u>18.56%</u>	<u>2,173</u>	<u>13.76%</u>	<u>81</u>	<u>27.84%</u>	<u>2,613</u>	<u>16.54%</u>
Middle	156	53.61%	7,626	48.28%	73	25.09%	2,920	18.49%
Upper	81	27.84%	5,996	37.96%	125	42.96%	9,841	62.3%
Unknown	0	0.0%	0	0.0%	12	4.12%	421	2.67%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>291</b>	<b>100.0%</b>	<b>15,795</b>	<b>100.0%</b>	<b>291</b>	<b>100.0%</b>	<b>15,795</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	4	13.79%	2,136	11.74%	0	0.0%	0	0.0%
Moderate	7	24.14%	3,672	20.18%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<u>11</u>	<u>37.93%</u>	<u>5,808</u>	<u>31.92%</u>	<u>0</u>	<u>0.0%</u>	<u>0</u>	<u>0.0%</u>
Middle	14	48.28%	11,038	60.66%	0	0.0%	0	0.0%
Upper	4	13.79%	1,352	7.43%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	29	100.0%	18,198	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>18,198</b>	<b>100.0%</b>	<b>29</b>	<b>100.0%</b>	<b>18,198</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	43	1.55%	4,872	1.43%	157	5.65%	9,195	2.71%
Moderate	318	11.45%	26,813	7.9%	409	14.72%	31,370	9.24%
<i>Low/Moderate Total</i>	<u>361</u>	<u>12.99%</u>	<u>31,685</u>	<u>9.33%</u>	<u>566</u>	<u>20.37%</u>	<u>40,565</u>	<u>11.95%</u>
Middle	1,542	55.51%	193,321	56.94%	662	23.83%	63,338	18.66%
Upper	875	31.5%	114,513	33.73%	1,250	45.0%	181,693	53.51%
Unknown	0	0.0%	0	0.0%	300	10.8%	53,923	15.88%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>2,778</b>	<b>100.0%</b>	<b>339,519</b>	<b>100.0%</b>	<b>2,778</b>	<b>100.0%</b>	<b>339,519</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: OVB

Selected Year: 2012

Huntington-Ashland MSA 2012 Peer

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	71	5.41%	2,727	4.11%	0	0.0%	0	0.0%
Moderate	381	29.04%	22,637	34.08%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	452	34.45%	25,364	38.18%	0	0.0%	0	0.0%
Middle	502	38.26%	26,499	39.89%	2	28.57%	15	12.82%
Upper	239	18.22%	13,532	20.37%	4	57.14%	100	85.47%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	119	9.07%	1,030	1.55%	1	14.29%	2	1.71%
<b>Total</b>	<b>1,312</b>	<b>100%</b>	<b>66,425</b>	<b>100%</b>	<b>7</b>	<b>100%</b>	<b>117</b>	<b>100%</b>
	<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	455	34.68%	24,913	37.51%	4	57.14%	105	89.74%
	<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	1,167	88.95%	14,157	21.31%	7	100.0%	117	100.0%
\$100,001 - \$250,000	64	4.88%	11,489	17.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	81	6.17%	40,779	61.39%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>1,312</b>	<b>100%</b>	<b>66,425</b>	<b>100%</b>	<b>7</b>	<b>100%</b>	<b>117</b>	<b>100%</b>

### HMDA Loan Distribution Table

Exam: OVB

Assessment Area/Group: Ohio Non MSA 2012 and 2013

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	13	5.9%	736	3.0%
Moderate	39	17.8%	3,503	14.4%	41	18.7%	3,020	12.4%
Low/Moderate Total	39	17.8%	3,503	14.4%	54	24.7%	3,756	15.5%
Middle	180	82.2%	20,768	85.6%	40	18.3%	3,477	14.3%
Upper	0	0.0%	0	0.0%	110	50.2%	15,553	64.1%
Unknown	0	0.0%	0	0.0%	15	6.8%	1,485	6.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	219	100.0%	24,271	100.0%	219	100.0%	24,271	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	9	3.8%	348	1.2%
Moderate	53	22.1%	6,102	21.6%	34	14.2%	2,533	8.9%
Low/Moderate Total	53	22.1%	6,102	21.6%	43	17.9%	2,881	10.2%
Middle	187	77.9%	22,210	78.4%	48	20.0%	4,784	16.9%
Upper	0	0.0%	0	0.0%	140	58.3%	19,470	68.8%
Unknown	0	0.0%	0	0.0%	9	3.8%	1,177	4.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	240	100.0%	28,312	100.0%	240	100.0%	28,312	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	16	18.2%	66	2.6%
Moderate	21	23.9%	383	15.1%	19	21.6%	447	17.7%
Low/Moderate Total	21	23.9%	383	15.1%	35	39.8%	513	20.3%
Middle	67	76.1%	2,148	84.9%	20	22.7%	653	25.8%
Upper	0	0.0%	0	0.0%	32	36.4%	1,356	53.6%
Unknown	0	0.0%	0	0.0%	1	1.1%	9	0.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	88	100.0%	2,531	100.0%	88	100.0%	2,531	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	100.0%	3,503	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	3,503	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	3,503	100.0%	3	100.0%	3,503	100.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	38	6.9%	1,150	2.0%
Moderate	113	20.5%	9,988	17.0%	94	17.1%	6,000	10.2%
Low/Moderate Total	113	20.5%	9,988	17.0%	132	24.0%	7,150	12.2%
Middle	437	79.5%	48,629	83.0%	108	19.6%	8,914	15.2%
Upper	0	0.0%	0	0.0%	282	51.3%	36,379	62.1%
Unknown	0	0.0%	0	0.0%	28	5.1%	6,174	10.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	550	100.0%	58,617	100.0%	550	100.0%	58,617	100.0%

\*Information based on 2010 ACS data

### Consumer Loan Distribution Table

Exam: OVB

Assessment Area/Group: Ohio Non MSA 2012 and 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Motor Vehicle</b>							
Low	0	0.0%	0	0.0%	13	1.1%	86	0.4%
Moderate	335	27.5%	4,910	24.6%	17	1.4%	216	1.1%
Low/Moderate Total	335	27.5%	4,910	24.6%	30	2.5%	302	1.5%
Middle	883	72.5%	15,027	75.4%	13	1.1%	175	0.9%
Upper	0	0.0%	0	0.0%	18	1.5%	280	1.4%
Unknown	0	0.0%	0	0.0%	1,157	95.0%	19,180	96.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,218	100.0%	19,938	100.0%	1,218	100.0%	19,938	100.0%
	<b>Consumer Loan Totals</b>							
Low	0	0.0%	0	0.0%	13	1.1%	86	0.4%
Moderate	335	27.5%	4,910	24.6%	17	1.4%	216	1.1%
Low/Moderate Total	335	27.5%	4,910	24.6%	30	2.5%	302	1.5%
Middle	883	72.5%	15,027	75.4%	13	1.1%	175	0.9%
Upper	0	0.0%	0	0.0%	18	1.5%	280	1.4%
Unknown	0	0.0%	0	0.0%	1,157	95.0%	19,180	96.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,218	100.0%	19,938	100.0%	1,218	100.0%	19,938	100.0%

### CRA Loan Distribution Table

Exam: OVB

Assessment Area/Group: Ohio Non MSA 2012 and 2013

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	38	26.2%	2,717	15.6%	0	0.0%	0	0.0%
Low/Moderate Total	38	26.2%	2,717	15.6%	0	0.0%	0	0.0%
Middle	107	73.8%	14,649	84.4%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	145	100.0%	17,366	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	64	44.1%	8,087	46.6%	0	0.0%	0	0.0%
Over \$1 Million	17	11.7%	3,202	18.4%	0	0.0%	0	0.0%
Not Known	64	44.1%	6,077	35.0%	0	0.0%	0	0.0%
Total	145	100.0%	17,366	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	107	73.8%	4,767	27.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	25	17.2%	3,610	20.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	11	7.6%	6,029	34.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	2	1.4%	2,960	17.0%	0	0.0%	0	0.0%
Total	145	100.0%	17,366	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	46	71.9%	2,222	27.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	12	18.8%	1,716	21.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	7.8%	2,389	29.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	1.6%	1,760	21.8%	0	0.0%	0	0.0%
Total	64	100.0%	8,087	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Exam ID: OVB

Selected Year: 2012

Ohio Non MSA 2012 Peer

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	44	7.59%	2,543	4.42%
Moderate	208	35.86%	19,203	33.39%	130	22.41%	10,442	18.16%
Low/Moderate Total	208	35.86%	19,203	33.39%	174	30.0%	12,985	22.58%
Middle	371	63.97%	38,288	66.57%	148	25.52%	14,910	25.92%
Upper	0	0.0%	0	0.0%	181	31.21%	23,304	40.52%
Unknown	1	0.17%	22	0.04%	77	13.28%	6,314	10.98%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	580	100.0%	57,513	100.0%	580	100.0%	57,513	100.0%
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	35	4.12%	2,180	2.19%
Moderate	285	33.57%	31,472	31.57%	128	15.08%	10,212	10.24%
Low/Moderate Total	285	33.57%	31,472	31.57%	163	19.2%	12,392	12.43%
Middle	564	66.43%	68,217	68.43%	191	22.5%	19,527	19.59%
Upper	0	0.0%	0	0.0%	388	45.7%	54,030	54.2%
Unknown	0	0.0%	0	0.0%	107	12.6%	13,740	13.78%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	849	100.0%	99,689	100.0%	849	100.0%	99,689	100.0%
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	27	16.98%	353	5.92%
Moderate	68	42.77%	2,176	36.49%	33	20.75%	935	15.68%
Low/Moderate Total	68	42.77%	2,176	36.49%	60	37.74%	1,288	21.6%
Middle	91	57.23%	3,788	63.51%	46	28.93%	1,765	29.59%
Upper	0	0.0%	0	0.0%	51	32.08%	2,814	47.18%
Unknown	0	0.0%	0	0.0%	2	1.26%	97	1.63%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	159	100.0%	5,964	100.0%	159	100.0%	5,964	100.0%
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	2,720	100.0%	0	0.0%	0	0.0%
Low/Moderate Total	1	100.0%	2,720	100.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	2,720	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	2,720	100.0%	1	100.0%	2,720	100.0%
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	106	6.67%	5,076	3.06%
Moderate	562	35.37%	55,571	33.5%	291	18.31%	21,589	13.01%
Low/Moderate Total	562	35.37%	55,571	33.5%	397	24.98%	26,665	16.07%
Middle	1,026	64.57%	110,293	66.49%	385	24.23%	36,202	21.82%
Upper	0	0.0%	0	0.0%	620	39.02%	80,148	48.32%
Unknown	1	0.06%	22	0.01%	187	11.77%	22,871	13.79%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,589	100.0%	165,886	100.0%	1,589	100.0%	165,886	100.0%

### Peer Group CRA Loan Distribution Table

Exam ID: OVB

Selected Year: 2012

#### Ohio Non MSA 2012 Peer

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	297	32.32%	6,328	34.11%	11	35.48%	387	40.02%
<i>Low/Moderate Income</i>	297	32.32%	6,328	34.11%	11	35.48%	387	40.02%
Middle	542	58.98%	11,345	61.16%	19	61.29%	576	59.57%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	80	8.71%	878	4.73%	1	3.23%	4	0.41%
<i>Total</i>	<i>919</i>	<i>100%</i>	<i>18,551</i>	<i>100%</i>	<i>31</i>	<i>100%</i>	<i>967</i>	<i>100%</i>
	<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	260	28.29%	5,913	31.87%	16	51.61%	812	83.97%
	<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	890	96.84%	7,445	40.13%	30	96.77%	667	68.98%
\$100,001 - \$250,000	11	1.2%	1,971	10.62%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	18	1.96%	9,135	49.24%	1	3.23%	300	31.02%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>919</i>	<i>100%</i>	<i>18,551</i>	<i>100%</i>	<i>31</i>	<i>100%</i>	<i>967</i>	<i>100%</i>

### HMDA Loan Distribution Table

Exam: OVB

Assessment Area/Group: WV Non MSA 2012 and 2013

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	2	3.8%	110	2.0%
Moderate	6	11.5%	525	9.4%	5	9.6%	331	6.0%
Low/Moderate Total	6	11.5%	525	9.4%	7	13.5%	441	7.9%
Middle	30	57.7%	3,431	61.7%	14	26.9%	1,333	24.0%
Upper	16	30.8%	1,603	28.8%	30	57.7%	3,533	63.6%
Unknown	0	0.0%	0	0.0%	1	1.9%	252	4.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	5,559	100.0%	52	100.0%	5,559	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	1	1.4%	51	0.7%
Moderate	11	15.7%	1,180	15.9%	5	7.1%	304	4.1%
Low/Moderate Total	11	15.7%	1,180	15.9%	6	8.6%	355	4.8%
Middle	42	60.0%	4,504	60.8%	10	14.3%	580	7.8%
Upper	17	24.3%	1,720	23.2%	52	74.3%	6,334	85.5%
Unknown	0	0.0%	0	0.0%	2	2.9%	135	1.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	7,404	100.0%	70	100.0%	7,404	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	1	5.3%	2	0.4%
Moderate	4	21.1%	60	11.7%	5	26.3%	47	9.2%
Low/Moderate Total	4	21.1%	60	11.7%	6	31.6%	49	9.6%
Middle	14	73.7%	359	70.3%	8	42.1%	286	56.0%
Upper	1	5.3%	92	18.0%	5	26.3%	176	34.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	511	100.0%	19	100.0%	511	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	4	2.8%	163	1.2%
Moderate	21	14.9%	1,765	13.1%	15	10.6%	682	5.1%
Low/Moderate Total	21	14.9%	1,765	13.1%	19	13.5%	845	6.3%
Middle	86	61.0%	8,294	61.6%	32	22.7%	2,199	16.3%
Upper	34	24.1%	3,415	25.3%	87	61.7%	10,043	74.5%
Unknown	0	0.0%	0	0.0%	3	2.1%	387	2.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	141	100.0%	13,474	100.0%	141	100.0%	13,474	100.0%

\*Information based on 2010 ACS data

### Consumer Loan Distribution Table

Exam: OVB

Assessment Area/Group: WV Non MSA 2012 and 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Motor Vehicle</b>							
Low	0	0.0%	0	0.0%	11	4.6%	124	3.6%
Moderate	43	18.1%	691	20.0%	16	6.7%	176	5.1%
Low/Moderate Total	43	18.1%	691	20.0%	27	11.3%	300	8.7%
Middle	154	64.7%	2,142	61.9%	18	7.6%	262	7.6%
Upper	41	17.2%	628	18.1%	17	7.1%	301	8.7%
Unknown	0	0.0%	0	0.0%	176	73.9%	2,599	75.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	238	100.0%	3,461	100.0%	238	100.0%	3,461	100.0%
	<b>Consumer Loan Totals</b>							
Low	0	0.0%	0	0.0%	11	4.6%	124	3.6%
Moderate	43	18.1%	691	20.0%	16	6.7%	176	5.1%
Low/Moderate Total	43	18.1%	691	20.0%	27	11.3%	300	8.7%
Middle	154	64.7%	2,142	61.9%	18	7.6%	262	7.6%
Upper	41	17.2%	628	18.1%	17	7.1%	301	8.7%
Unknown	0	0.0%	0	0.0%	176	73.9%	2,599	75.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	238	100.0%	3,461	100.0%	238	100.0%	3,461	100.0%

### CRA Loan Distribution Table

Exam: OVB

Assessment Area/Group: WV Non MSA 2012 and 2013

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	10.5%	75	0.8%	0	0.0%	0	0.0%
Low/Moderate Total	2	10.5%	75	0.8%	0	0.0%	0	0.0%
Middle	15	78.9%	8,334	84.1%	0	0.0%	0	0.0%
Upper	2	10.5%	1,500	15.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	9,909	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>							
Total \$1 Million or Less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	19	100.0%	9,909	100.0%	0	0.0%	0	0.0%
Total	19	100.0%	9,909	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>							
\$100,000 or less	8	42.1%	283	2.9%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	10.5%	439	4.4%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	31.6%	3,512	35.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	3	15.8%	5,675	57.3%	0	0.0%	0	0.0%
Total	19	100.0%	9,909	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

Peer Group HMDA Loan Distribution Table

Exam ID: OVB

Selected Year: 2012

WV Non MSA 2012 Peer

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	4	3.54%	165	1.68%
Moderate	7	6.19%	716	7.29%	17	15.04%	1,104	11.25%
<i>Low/Moderate Total</i>	<u>7</u>	<u>6.19%</u>	<u>716</u>	<u>7.29%</u>	<u>21</u>	<u>18.58%</u>	<u>1,269</u>	<u>12.93%</u>
Middle	83	73.45%	7,312	74.49%	34	30.09%	2,697	27.48%
Upper	21	18.58%	1,641	16.72%	47	41.59%	4,852	49.43%
Unknown	2	1.77%	147	1.5%	11	9.73%	998	10.17%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>113</b>	<b>100.0%</b>	<b>9,816</b>	<b>100.0%</b>	<b>113</b>	<b>100.0%</b>	<b>9,816</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	12	6.06%	656	3.4%
Moderate	22	11.11%	2,205	11.42%	20	10.1%	1,122	5.81%
<i>Low/Moderate Total</i>	<u>22</u>	<u>11.11%</u>	<u>2,205</u>	<u>11.42%</u>	<u>32</u>	<u>16.16%</u>	<u>1,778</u>	<u>9.21%</u>
Middle	133	67.17%	13,190	68.34%	35	17.68%	2,502	12.96%
Upper	39	19.7%	3,153	16.34%	123	62.12%	14,221	73.68%
Unknown	4	2.02%	753	3.9%	8	4.04%	800	4.14%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>198</b>	<b>100.0%</b>	<b>19,301</b>	<b>100.0%</b>	<b>198</b>	<b>100.0%</b>	<b>19,301</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	9	13.24%	137	5.38%
Moderate	10	14.71%	336	13.19%	17	25.0%	602	23.63%
<i>Low/Moderate Total</i>	<u>10</u>	<u>14.71%</u>	<u>336</u>	<u>13.19%</u>	<u>26</u>	<u>38.24%</u>	<u>739</u>	<u>29.0%</u>
Middle	53	77.94%	2,065	81.04%	17	25.0%	576	22.61%
Upper	5	7.35%	147	5.77%	25	36.76%	1,233	48.39%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>68</b>	<b>100.0%</b>	<b>2,548</b>	<b>100.0%</b>	<b>68</b>	<b>100.0%</b>	<b>2,548</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<u>0</u>	<u>0.0%</u>	<u>0</u>	<u>0.0%</u>	<u>0</u>	<u>0.0%</u>	<u>0</u>	<u>0.0%</u>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	2,654	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	2,654	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>2,654</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>2,654</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	25	6.58%	958	2.79%
Moderate	39	10.26%	3,257	9.49%	54	14.21%	2,828	8.24%
<i>Low/Moderate Total</i>	<u>39</u>	<u>10.26%</u>	<u>3,257</u>	<u>9.49%</u>	<u>79</u>	<u>20.79%</u>	<u>3,786</u>	<u>11.03%</u>
Middle	269	70.79%	22,567	65.76%	86	22.63%	5,775	16.83%
Upper	66	17.37%	7,595	22.13%	195	51.32%	20,306	59.17%
Unknown	6	1.58%	900	2.62%	20	5.26%	4,452	12.97%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>380</b>	<b>100.0%</b>	<b>34,319</b>	<b>100.0%</b>	<b>380</b>	<b>100.0%</b>	<b>34,319</b>	<b>100.0%</b>

### Peer Group CRA Loan Distribution Table

Exam ID: OVB

Selected Year: 2012

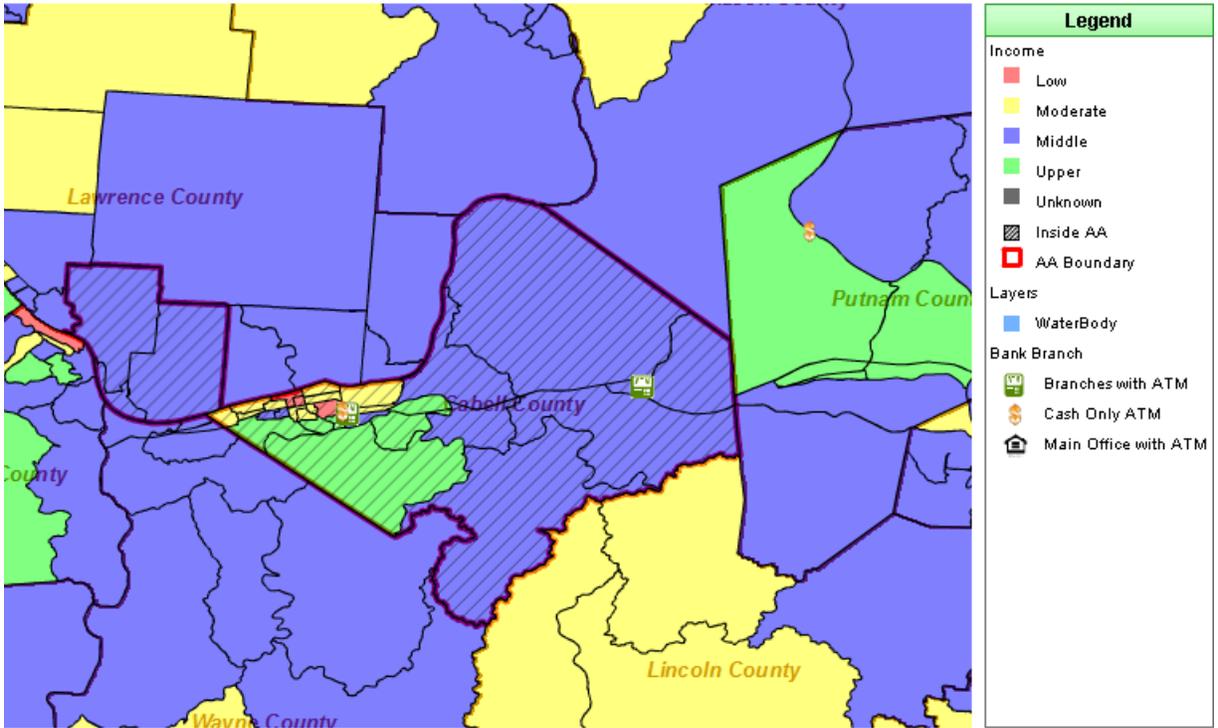
#### WV Non MSA 2012 Peer

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	12	6.7%	130	2.52%	3	21.43%	13	9.92%
<i>Low/Moderate Income</i>	12	6.7%	130	2.52%	3	21.43%	13	9.92%
Middle	69	38.55%	3,574	69.34%	10	71.43%	108	82.44%
Upper	51	28.49%	1,305	25.32%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	47	26.26%	145	2.81%	1	7.14%	10	7.63%
<b>Total</b>	<b>179</b>	<b>100%</b>	<b>5,154</b>	<b>100%</b>	<b>14</b>	<b>100%</b>	<b>131</b>	<b>100%</b>
	<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	52	29.05%	2,346	45.52%	7	50.0%	35	26.72%
	<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	171	95.53%	1,538	29.84%	14	100.0%	131	100.0%
\$100,001 - \$250,000	1	0.56%	176	3.41%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	7	3.91%	3,440	66.74%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>179</b>	<b>100%</b>	<b>5,154</b>	<b>100%</b>	<b>14</b>	<b>100%</b>	<b>131</b>	<b>100%</b>

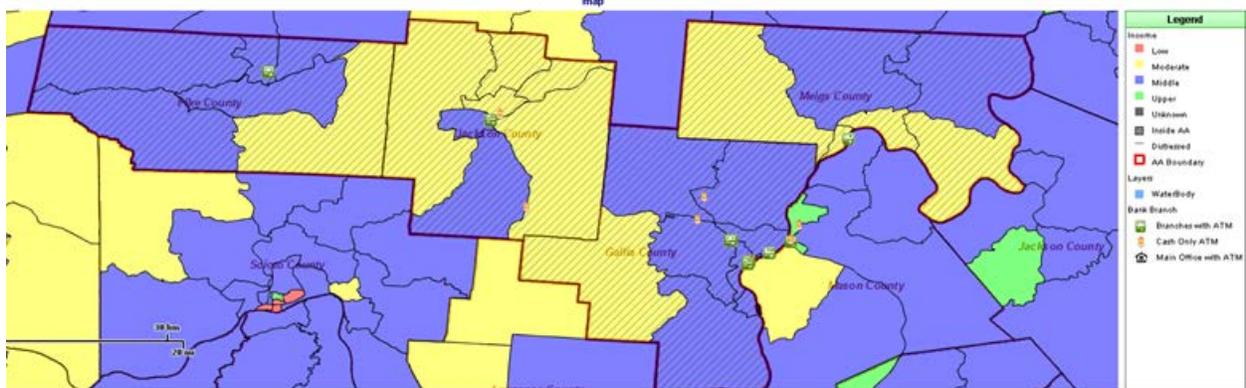
APPENDIX C

ASSESSMENT AREA MAPS

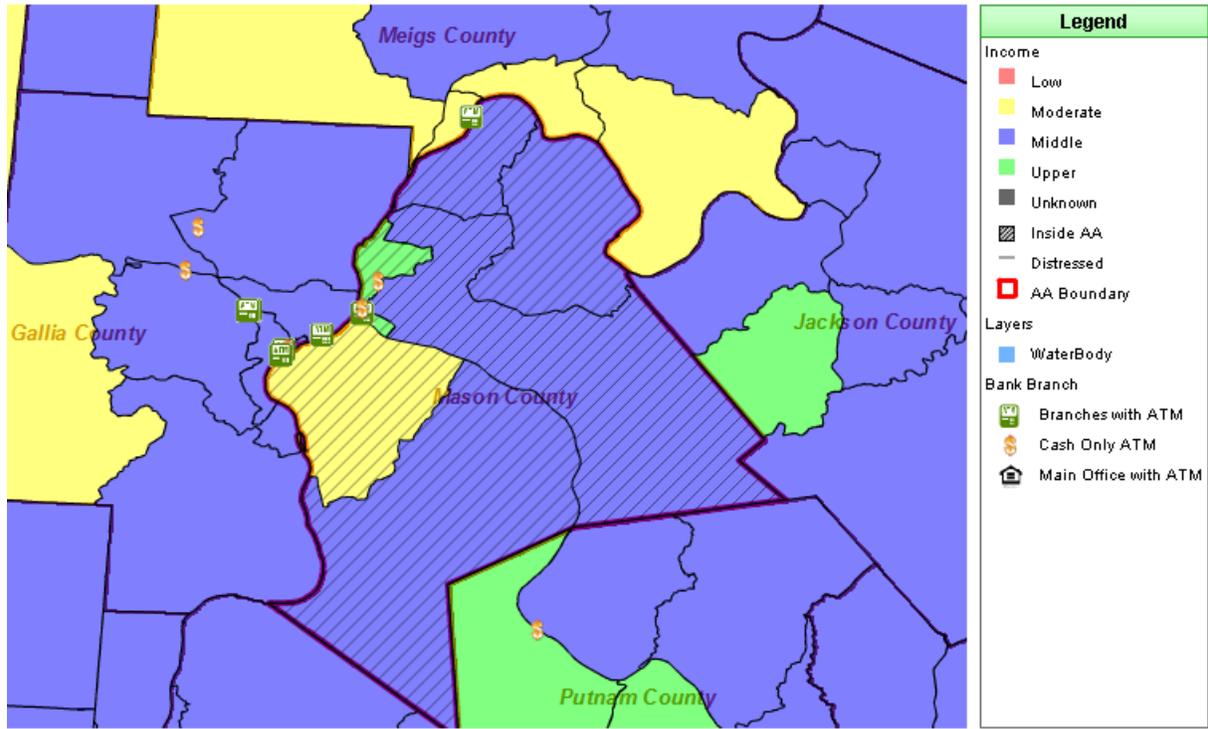
**Assessment Area: Huntington-Ashland MSA 2013**



**Assessment Area: Ohio Non MSA 2013**



**Assessment Area: West Virginia Non MSA 2013**



## APPENDIX D

### GLOSSARY OF TERMS

**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 metropolitan area/assessment area.

**Census tract:** 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 statistical 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:** All Agencies have adopted the following language. 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.

**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-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

**Limited-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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