

PUBLIC DISCLOSURE

June 19, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Ohio Valley Bank Company
RSSD # 498317

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Gallipolis, Ohio 45631

Federal Reserve Bank of Cleveland

P.O. Box 6387
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, 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.

TABLE OF CONTENTS

Institution’s CRA Rating	1
Scope of Examination	2
Description of Institution	4
Description of Assessment Areas	6
Conclusions with Respect to Performance Tests	7
Huntington-Ashland, WV-KY-OH Multi-state Metropolitan Statistical Area (Full-scope review)	
a. Multistate Metropolitan Area Rating.....	11
b. Description of Institution’s Operations.....	12
c. Conclusions with Respect to Performance Tests	17
Non-metropolitan Ohio (Full-scope review)	
a. State of Ohio Rating.....	21
b. Description of Institution’s Operations.....	22
c. Conclusions with Respect to Performance Tests	29
Non-metropolitan West Virginia (Full-scope review)	
a. State of West Virginia Rating.....	39
b. Description of Institution’s Operations.....	40
c. Conclusions with Respect to Performance Tests	45
Appendix A: Assessment Area Map.....	50
Appendix B: Lending Tables	53
Appendix C: Glossary of Terms	62

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

The major factors and criteria contribution to this rating include:

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs;
- A majority of loans and community development activities are inside the assessment area;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income);
- The distribution of loans to businesses reflects a reasonable penetration among businesses of different revenue sizes given the demographics of the assessment areas;
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment areas;
- The community development activities are responsive to the community developments needs of the assessment area; and,
- There were no CRA-related complaints filed against the bank since the previous CRA examination.

The previous CRA examination conducted April 28, 2014 resulted in a "Satisfactory" performance rating.

SCOPE OF EXAMINATION

The Ohio Valley Bank Company (OVB)'s Community Reinvestment Act (CRA) performance was evaluated using the interagency intermediate small bank examination procedures under Regulation BB.

OVB's CRA performance was evaluated based on lending data for the period of January 1, 2014 to December 31, 2016. The products evaluated included consumer, residential, and commercial loans. Consumer loans are comprised of motor vehicle, other-secured, and other-unsecured loans. Residential loans are comprised of home purchase, refinance, and home improvement loans, as reported by OVB under the Home Mortgage Disclosure Act (HMDA). Commercial loans are comprised of loans that 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. These loans are also referred to as, "small business," loans.

Community development activities for the period between April 28, 2014 and June 19, 2017 were also reviewed as part of this evaluation, specifically community development loans, investments, and services occurring since the previous examination.

OVB's CRA-delineated footprint is comprised of the following four assessment areas; the scope of the review for each area was determined based on the volume of lending activity and deposit share:

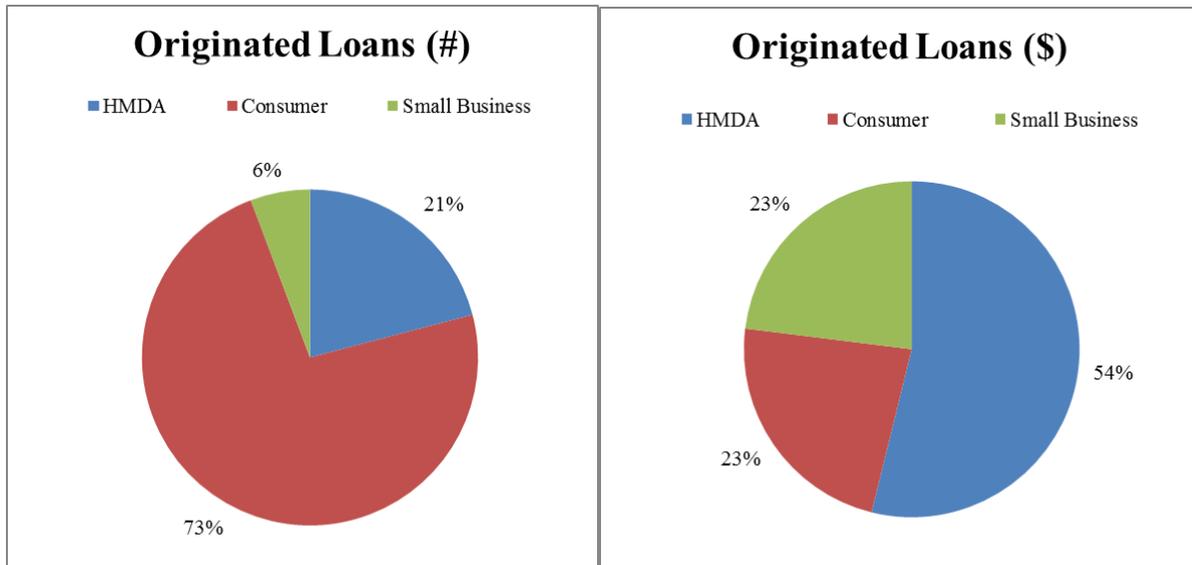
- Huntington-Ashland, WV-KY-OH Multi-state Metropolitan Statistical Area #26580 – Full-scope evaluation
- Columbus, OH Metropolitan Statistical Area # 18140 – Not assessed
- Non-metropolitan Ohio – Full-scope evaluation
- Non-metropolitan West Virginia – Full-scope evaluation

A detailed description of the three assessment areas assessed is presented in subsequent sections of this performance evaluation.

Two community contact interviews were conducted to provide perspective on the credit needs of the assessment areas in which OVB operates. Details from these interviews are presented within the respective assessment areas of this evaluation.

The following table and charts illustrate the volume and distribution of loans originated within OVB's assessment area during the evaluation period.

Loan Type	Number of Loans	Dollar Amount of Loans (000s)
HMDA	1024	125,261
Consumer	3593	53,768
Small Business	281	53,554
Total	4,898	232,583



Based on total loan volume by number and dollar amount and the composition of the loan portfolio, HMDA lending received the most weight, followed by consumer and small business lending.

For the purpose of this evaluation, borrower distribution received greater weight than geographic distribution given the limited number of low- and moderate-income and distressed or underserved middle-income census tracts.

DESCRIPTION OF INSTITUTION

OVB is the banking subsidiary of Ohio Valley Bank Corporation located in Gallipolis, Ohio. As of March 31, 2017, OVB reported \$1.0 billion in total assets, which is an increase of 39.3% since the previous CRA evaluation. This increase can be partially attributed to OVB's acquisition of Milton Bank, headquartered in Wellston, Ohio, in August 2016. Milton Bank's total assets, at time of acquisition, were valued at approximately \$135 million.

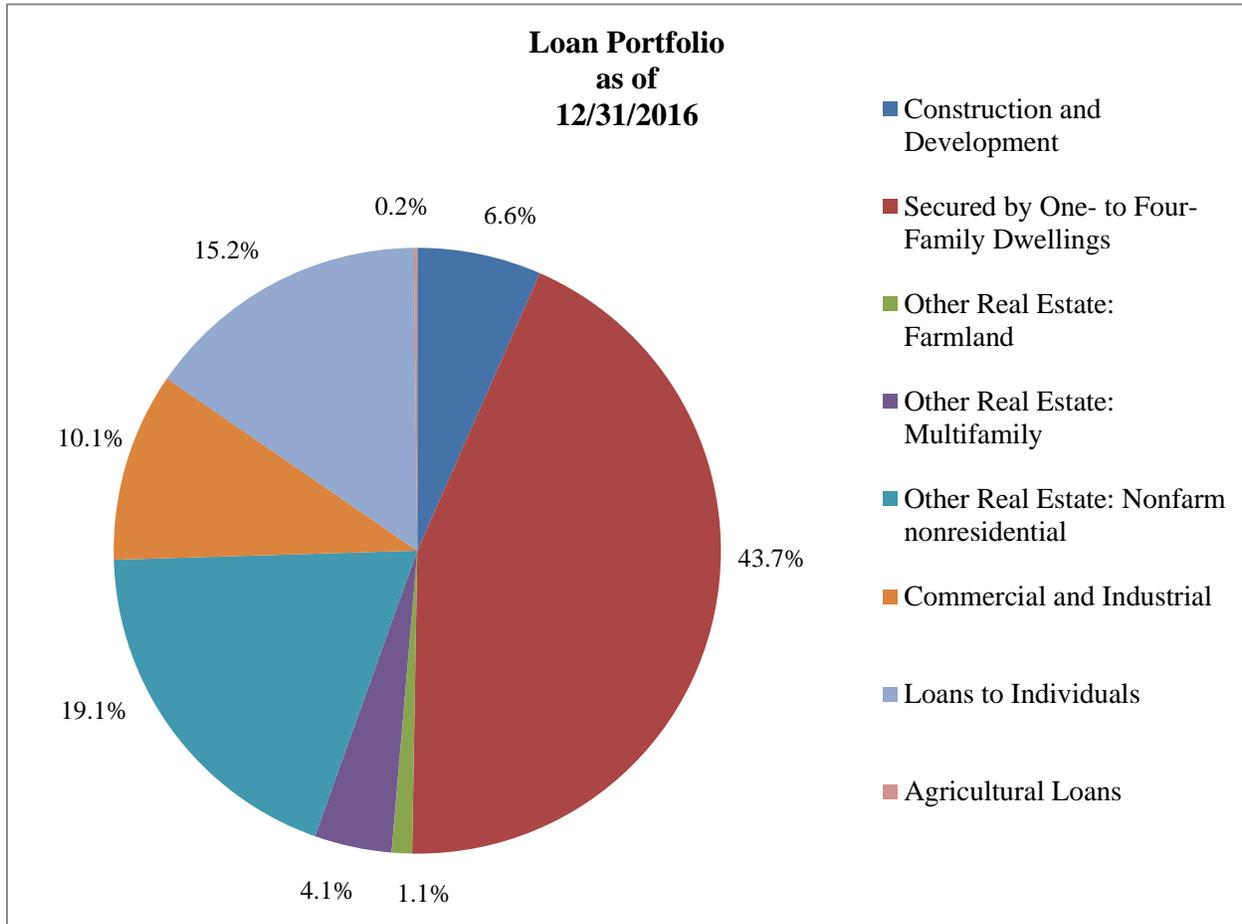
OVB's main office is located in Gallipolis, Ohio. OVB operates 16 additional branch offices, two loan production offices, and 43 (2 full-service and 41 cash-dispensing) ATMs throughout its assessment areas. OVB is a full-service retail bank offering deposit accounts, residential mortgages, consumer, and commercial loans. Since the previous evaluation, OVB has opened six branch offices, five of which resulted from the Milton Bank acquisition. These branches are located in Barboursville, WV and Jackson, Wellston, Oak Hill, New Holland, and Mt. Sterling, OH. OVB closed three branch offices since the previous evaluation. These offices were located in South Point and Gallipolis, OH and Huntington, WV.

As of March 31, 2017, net loans and leases are \$721.7 million, which represent 70.5% of total assets. Net loans and leases increased by 23.9% since the previous CRA evaluation.

The following table and charts illustrate the volume and distribution of loans originated within OVB's assessment area during the evaluation period.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2016		12/31/2015		12/31/2014	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	45,870	6.6%	23,852	4.3%	27,535	5.0%
Secured by One- to Four- Family Dwellin	302,686	43.7%	239,743	43.2%	236,246	42.5%
Other Real Estate: Farmland	7,499	1.1%	4,878	0.9%	4,782	0.9%
Other Real Estate: Multifamily	28,457	4.1%	13,887	2.5%	17,152	3.1%
Other Real Estate: Nonfarm nonresidenti	132,182	19.1%	126,695	22.8%	128,143	23.0%
Commercial and Industrial	69,838	10.1%	63,376	11.4%	61,366	11.0%
Loans to Individuals	105,524	15.2%	81,867	14.8%	80,943	14.6%
Agricultural Loans	1,253	0.2%	359	0.1%	50	0.0%
<i>Total</i>	<i>\$693,309</i>	<i>100.00%</i>	<i>\$554,657</i>	<i>100.00%</i>	<i>\$556,217</i>	<i>100.00%</i>

* 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.



OVB's investment portfolio, as of March 31, 2017, was \$217.5 million, which represented 21.2% of total assets. Investments in U.S. Treasuries and Agencies account for 47.4% of investments, while municipal securities and interest-bearing bank balances comprise 8.7% and 43.9% of investments, respectively.

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.

DESCRIPTION OF ASSESSMENT AREAS

OVB has delineated the following four assessment areas:

- Huntington-Ashland, WV-KY-OH Multi-state Metropolitan Statistical Area #26580 (Huntington-Ashland multi-state), comprising the entirety of Cabell County, West Virginia.
- Columbus, OH Metropolitan Statistical Area #18140, comprising the entireties of Pickaway and Madison. While not part of the metropolitan statistical area, the entirety of Fayette County is included in this assessment area, as it is adjacent to Madison County. OVB's assessment areas was revised in August 2016 to include this assessment area as a result of the acquisition of Milton Bank. Given the limited timeframe during the review period and the 2016 aggregate HMDA data not being available as of this evaluation, performance was not assessed. An assessment will be completed as part of the next CRA Performance Evaluation.
- Non-metropolitan Ohio, comprising the entireties of Gallia, Jackson, Meigs, Pike, and Vinton counties.
- Non-metropolitan West Virginia, comprising the entirety of Mason County.

OVB's assessment areas consist of 96 census tracts, of which five (5.2%) are designated as low-income, 29 (30.2%) are moderate-income, 52 (54.2%) are middle-income, and nine (9.4%) are upper-income tracts. One tract's income was unknown.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

OVB's overall performance under the lending test is considered satisfactory. Lending performance in all three assessment areas is considered reasonable.

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 the institution's lending volume relative to its capacity to lend and is derived by adding the quarterly LTD ratios and dividing by the total number of quarters. The following table illustrates OVB's quarterly LTD ratios compared to its aggregate peer group, consisting of all insured commercial banks having assets between \$1 billion and \$3 billion and three local peer banks from the Deposit Market Share Report.

Ohio Valley Banking Company Loan-to-Deposit Ratios					
AS OF DATE	OHIO VALLEY BK CO	FARMERS BK & SVG CO	HUNTINGTON FSB	FIRST NB	CUSTOM PEER
December 31, 2016	90.18	88.69	44.16	54.52	62.46
September 30, 2016	86.80	87.46	44.14	54.60	62.07
June 30, 2016	85.82	86.15	43.36	55.46	61.66
March 31, 2016	76.29	87.07	44.13	57.56	62.92
December 31, 2015	85.55	85.50	44.81	59.65	63.32
September 30, 2015	84.07	86.33	45.04	54.92	62.10
June 30, 2015	85.86	83.63	44.82	52.66	60.37
March 31, 2015	79.04	85.88	45.36	50.40	60.55
December 31, 2014	88.50	86.82	45.79	51.79	61.47
September 30, 2014	87.73	85.52	45.38	53.18	61.36
June 30, 2014	88.93	82.70	45.86	51.41	59.99
March 31, 2014	79.04	84.10	45.44	52.81	60.78
Quarterly Loan-to-Deposit Ratio Average Since the	84.82	85.82	44.86	54.08	61.59

OVB's average LTD ratio was 84.82% over the past twelve quarters. OVB's LTD ratio was compared to three local peer banks: The Farmers Bank & Savings Company in Pomeroy, Ohio; Huntington Federal Savings Bank in Huntington, West Virginia; and The First National Bank of Waverly in Waverly, Ohio. While OVB's LTD ratio is well in line with Farmers Bank and Savings Company's and is well above Huntington Federal Savings Bank and The First National Bank of Waverly's quarterly averages.

Considering its lending-related activity, size, financial condition, and assessment area credit needs, OVB's LTD ratio is considered reasonable.

Lending in the Assessment Area

OVB’s mortgage, small business, and consumer lending was analyzed to determine the volume of lending inside and outside the bank’s assessment area. Of OVB’s total loans, 84.7% by volume and 67.3% by dollar amount were made inside the assessment area.

The following table shows the distribution of loans made inside and outside OVB’s assessment area.

Lending Inside and Outside the Assessment Area

Exam: OVB Initial, 2017

Loan Type - Description	Inside				Outside				Total	
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	\$(000s)
MV - Motor Vehicle	1,504	80.2	25,489	75.0	371	19.8	8,495	25.0	1,875	33,984
OS - Other - Secured	719	90.2	9,558	86.2	78	9.8	1,524	13.8	797	11,082
OU - Other - Unsecured	842	91.4	8,033	92.3	79	8.6	670	7.7	921	8,702
Total Consumer related	3,065	85.3	43,080	80.1	528	14.7	10,689	19.9	3,593	53,768
CV - Home Purchase - Conventional	484	82.9	59,647	79.9	100	17.1	14,986	20.1	584	74,633
HI - Home Improvement	193	84.3	8,720	75.7	36	15.7	2,806	24.3	229	11,526
MF - Multi-Family Housing	3	30.0	1,429	10.8	7	70.0	11,817	89.2	10	13,246
RF - Refinancing	170	84.6	20,112	77.8	31	15.4	5,744	22.2	201	25,856
Total HMDA related	850	83.0	89,908	71.8	174	17.0	35,353	28.2	1,024	125,261
SB - Small Business	233	82.9	23,578	44.0	48	17.1	29,977	56.0	281	53,554
Total Small Bus. related	233	82.9	23,578	44.0	48	17.1	29,977	56.0	281	53,554
TOTAL LOANS	4,148	84.7	156,565	67.3	750	15.3	76,018	32.7	4,898	232,584

Therefore, a majority of OVB’s loans by both volume and dollar amount were made inside its assessment area.

Geographic Distribution of Lending

OVB’s geographic distribution of lending is reasonable. Geographic distribution was weighted less than borrower distribution due to the low number of low- and moderate-income tracts in OVB’s CRA-delineated footprint. Geographic distribution is considered adequate in the Huntington-Ashland multi-state, Non-metropolitan Ohio, and Non-metropolitan West Virginia. HMDA lending, which received the most weight, is considered adequate. Consumer and small business lending are considered excellent. The respective analyses are included within each assessment area evaluation later in this report.

Borrower Distribution of Lending

OVB's lending to borrowers of different income levels and businesses of different revenue sizes are reasonable. HMDA lending, which received the greatest weight, is adequate. Consumer and small business lending are good. The respective analyses can be found within each assessment area discussion later in this report.

Response to Consumer Complaints

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

Fair Lending or Other Illegal Credit Practices Review

While management has implemented policies, procedures, training programs, and internal assessments, a substantive violation of Section (5) of the Federal Trade Commission Act involving unfair practices was identified in the concurrent Consumer Compliance examination. The violation did not cause the CRA rating to be adjusted. Bank management was proactive in taking corrective action to address the violation.

Community Development Test

OVB is rated outstanding under the community development test. OVB's community development performance demonstrated an excellent responsiveness to the needs of its assessment areas through community development loans, investments and services, considering the bank's capacity and the need and availability of community development opportunities throughout the assessment areas. The respective analyses can be found within each assessment area discussion later in this report.

Community Development Lending

During the review period, OVB originated ten community development loans totaling \$4.5 million, which is considered to be a relatively high level of community development loans. The community development loans are responsive to the community developments needs of the assessment area.

Nine of these loans were originated within Non-metropolitan Ohio and one loan was originated in Non-metropolitan West Virginia. There was no community development lending activity in the Huntington-Ashland multi-state, as the Huntington-Ashland multi-state has only two branch offices. Details on these loans can be found in the respective assessment area analyses.

Qualified Investments

OVB had 11 investments totaling \$13.3 million during this evaluation period. The majority of the investment dollars were made in Non-metropolitan Ohio for community services and economic development. The community development investments are responsive to the community developments needs of the assessment area. Refer to the respective assessment area analyses for further details.

Community Development Services

Overall, OVB provides a high level of community development services in the Huntington-Ashland multi-state, Non-metropolitan Ohio, and Non-metropolitan West Virginia. OVB'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. The community development services are responsive to the community developments needs of the assessment area.

Financial Education

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 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.

Board and Committee Memberships

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

**HUNTINGTON-ASHLAND, WV-KY-OH MULTI-STATE METROPOLITAN
STATISTICAL AREA #26580**

(Full-scope Review)

CRA Rating for Huntington-Ashland, WV-KY-OH Multistate MSA #26580: “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 penetration among individuals of different income (including low- and moderate-income individuals) levels;
- The geographic dispersion of loans reflects a reasonable dispersion throughout the assessment area;
- A reasonable level of responsiveness to the community development needs of its assessment area.

DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN HUNTINGTON-ASHLAND, WV-KY-OH MULTISTATE METROPOLITAN STATISTICAL AREA

The Huntington-Ashland multi-state consists of the entireties of Boyd and Greenup Counties in Kentucky, Lawrence County in Ohio, and Cabell and Wayne Counties in West Virginia; however, OVB’s assessment area encompasses only the entirety of Cabell County, WV. This assessment area consists of a total of 29 census tracts comprising four low-income (13.8%), 10 moderate-income (34.5%), nine middle-income (31.0%), and six upper-income census tracts (20.7%). OVB has two offices in Cabell County, one in a middle-income tract and one in an upper-income tract.

Cabell County is located in western West Virginia along the Ohio River. Huntington is the largest city and county seat. The county had a population of 96,319, according to the 2010 U.S. Census.

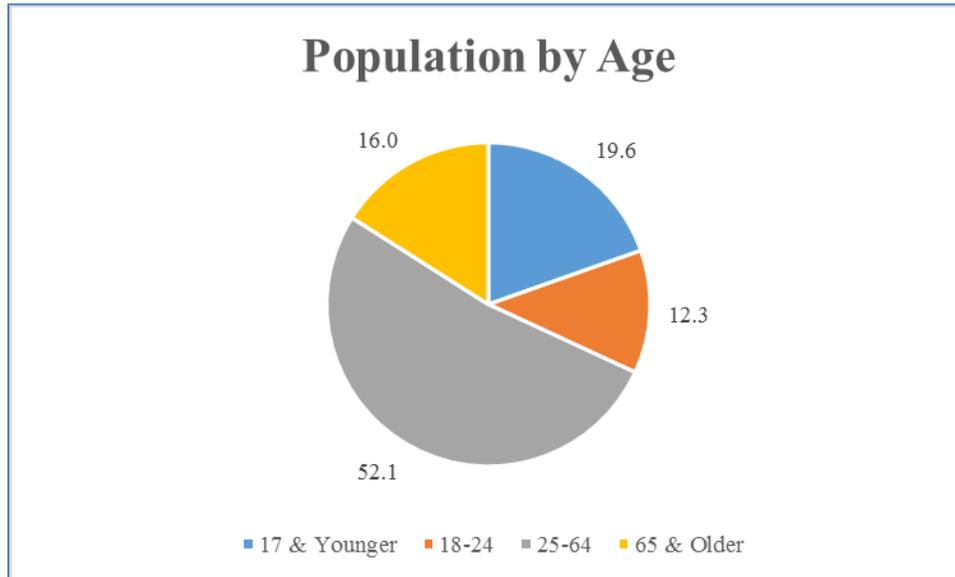
According to the June 30, 2016 FDIC Deposit Market Share Report, OVB ranked tenth out of 13 institutions in the market with a deposit share of 2.10% in Cabell County.¹

#	Financial Institution	Deposit Market Share
1	Huntington Federal Savings Bank	17.87%
2	First Sentry Bank, Inc.	17.73%
3	JPMorgan Chase Bank, National Association	14.89%
4	Branch Banking and Trust Company	13.80%
5	City National Bank of West Virginia	9.26%
6	The First State Bank	8.40%
7	United Bank	6.61%
8	Fifth Third Bank	3.99%
9	The Huntington National Bank	3.52%
10	The Ohio Valley Bank Company	2.10%

Population Characteristics

According to the 2010 U.S. Census, the total population in the assessment area was 96,319. Approximately, 9.0% of the assessment area’s population resides in low-income tracts and 24.3% in moderate-income tracts, while 39.8% reside in middle-income tracts and 26.9% reside in upper-income tracts. As shown in the chart below, 80.4% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 64.4% of the population is between the ages of 18 and 64 and more likely to have credit needs.

¹ <http://www2.fdic.gov/sod/sodMarketBank.asp>



The population in the Huntington MSA is stable, as depicted in the following table, which shows the actual and projected population change over the 2010 U.S. Census figure.²

County	2010 Population	2015 Population	Population Percent Change
Cabell (WV)	96,319	96,844	0.5%
Total	96,319	96,844	

Income Characteristics

According to data from the U.S. Department of Housing and Urban Development (HUD), the 2010 median family income levels for the assessment area was \$48,500. The 2015 and 2016 estimated median family income levels are detailed in the following table.³

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
2015	\$55,400	0 - \$27,699	\$27,700 - \$44,319	\$44,320 - \$66,479	\$66,480 - & above
2016	\$56,900	0 - \$28,449	\$28,450 - \$45,519	\$45,520 - \$68,279	\$68,280 - & above

The assessment area contains 40,564 households, of which 24,695 (60.9%) are designated as families. Low- and moderate-income families represent 22.7% and 19.1% of all families in this assessment area, respectively, with 15.2% of families below the poverty level as compared to 12.8% of all families below the poverty level within West Virginia.

² http://www.development.ohio.gov/reports/reports_countytrends_map.htm

³ <http://www.huduser.org/portal/datasets/il/il13/index.html>

Based on 2015 data from the Economic Research Service of the U.S. Department of Agriculture (USDA), household poverty rates for the counties in the assessment area were as follows:

County	2014 Poverty Rate	2015 Poverty Rate	Change
Cabell Co.	21.90%	20.20%	-7.76%
State of West Virginia	18.30%	18.00%	-1.64%
United States	15.50%	14.70%	-5.16%

The poverty rate for Cabell County has decreased at a higher rate than both West Virginia and the country.

Labor, Employment and Economic Characteristics

According to the West Virginia Department of Commerce, the largest industries by average employment are health care and social services, retail, education, and accommodation and food services. The following table identifies the employment sectors and major employers in OVB’s assessment area, but is not limited to the following:⁴

County	Primary Employment Sectors	Major Employers
Cabell	Health Care and Social Services; Retail; Education; Accommodation and Food Services	St. Marys Hospital; Cabell Huntington Hospital Inc; Marshall University; Gc Services Limited Partnership; Huntington Alloys Corporation; Prc LLC; Alcon Manufacturing Ltd; Steel of West Virginia Inc; Wal-Mart Stores Inc; US Department of Defense

The following table shows the 2015 and 2016 average annual unemployment rate for Cabell County, West Virginia, and the Huntington-Ashland multi-state as a whole.

Unemployment Rates
Ohio Valley Bank: Huntington-Ashland, WV-KY-OH - MSA

Area	Years - Annualized	
	2015	2016
Cabell Co.	4.3	3.9 (P)
West Virginia	5.9 (D)	5.1 (D)
Huntington-Ashland, WV-KY-OH MSA	5.8	5.3 (P)
National	4.8	4.5

Not Seasonally Adjusted, Data Extracted on April 21, 2017
D: Reflects revised population controls and model reestimation
P: Preliminary

The unemployment rate for Cabell County was lower than West Virginia for both years. The county experienced a decline in the unemployment rate between the two years, as did West Virginia and the Huntington-Ashland MSA.

⁴ <http://westvirginia.gov/community-profile.html>

Housing Characteristics

There are 46,129 housing units in this assessment area, based on the 2010 U.S. Census. Within this assessment area, 56.4% of the units are owner-occupied, 31.5% are rental units, and 12.1% are vacant. Only 4.7% and 18.1% of all owner-occupied housing units are located in low- and moderate-income census tracts, respectively, suggesting limited opportunity for mortgage credit for individual borrowers in low- and moderate-income geographies.

The median age of housing stock was 48 years, according to the 2010 U.S. Census, with 33.8% of housing built prior to 1950. Older homes such as these are typically more likely to require repairs and rehabilitation. The median housing value in the assessment area was \$97,530, with an affordability ratio of 35.4%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Further, based on the 2016 median family income for the Huntington-Ashland multi-state (\$56,900), approximately 53.7% of the homes valued up to \$104,285 in the assessment area would be considered affordable for low-income individuals and 77.7% of the homes valued up to \$166,857 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

According to Sperling's Best Places, the 2016 median home cost in Cabell County was \$107,400, an appreciation of 4.1% over the prior year.⁵

One in every 3,070 (0.0003%) properties in Cabell County was in foreclosure in April 2017. This was higher than West Virginia's ratio of one in every 10,011 properties.⁶

The median gross rent in the assessment area was \$590, with 14.9% of the rental units having rents of less than \$350 a month, according to the 2010 U.S. Census. The majority of rents (30.5%) in this assessment area were \$500-\$699 per month and 16.3% of rents were \$350-\$499, while 30.0% of rents were greater than \$700. Over one-third of all housing units in the assessment area are rental units. Additionally, 46.7% of renters have rent costs greater than 30.0% of their income.

The table on the following page illustrates the demographics in the Huntington-Ashland multi-state.

⁵ Sperling's Best Places, www.bestplaces.net

⁶ www.realtytrac.net

Combined Demographics Report

Assessment Area(s): Huntington-Ashland MSA 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	13.8	1,688	6.8	677	40.1	5,594	22.7
Moderate-income	10	34.5	5,059	20.5	1,492	29.5	4,719	19.1
Middle-income	9	31	10,902	44.1	1,091	10	4,548	18.4
Upper-income	6	20.7	7,046	28.5	510	7.2	9,834	39.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	29	100.0	24,695	100.0	3,770	15.3	24,695	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,694	1,227	4.7	26.1	2,442	52	1,025	21.8
Moderate-income	11,661	4,709	18.1	40.4	5,155	44.2	1,797	15.4
Middle-income	18,009	11,768	45.2	65.3	4,367	24.2	1,874	10.4
Upper-income	11,765	8,326	32	70.8	2,570	21.8	869	7.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	46,129	26,030	100.0	56.4	14,534	31.5	5,565	12.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	293	8.3	243	7.9	45	11.5	5	11.4
Moderate-income	1,181	33.6	988	32.1	175	44.5	18	40.9
Middle-income	1,116	31.7	1,005	32.6	95	24.2	16	36.4
Upper-income	928	26.4	845	27.4	78	19.8	5	11.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	3,518	100.0	3,081	100.0	393	100.0	44	100.0
Percentage of Total Businesses:			87.6		11.2		1.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1	2.3	1	2.4	0	0	0	0
Middle-income	30	69.8	29	69	1	100	0	0
Upper-income	12	27.9	12	28.6	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	43	100.0	42	100.0	1	100.0	0	.0
Percentage of Total Farms:			97.7		2.3		.0	

2016 FFIEC Census Data and 2016 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN HUNTINGTON-ASHLAND, WV-KY-OH MULTI-STATE METROPOLITAN STATISTICAL AREA

Lending Test

Lending performance in the Huntington-Ashland multi-state is considered to be reasonable.

The greatest consideration, based on number and volume, was given to HMDA lending, followed by consumer lending. Small business lending was not considered due to the low volume of originations. OVB's lending performance was also compared to the 2015 aggregate performance of all lenders required to report HMDA data within the respective assessment areas.

Details of OVB's HMDA, consumer, and small business lending can be found in the tables in Appendix B.

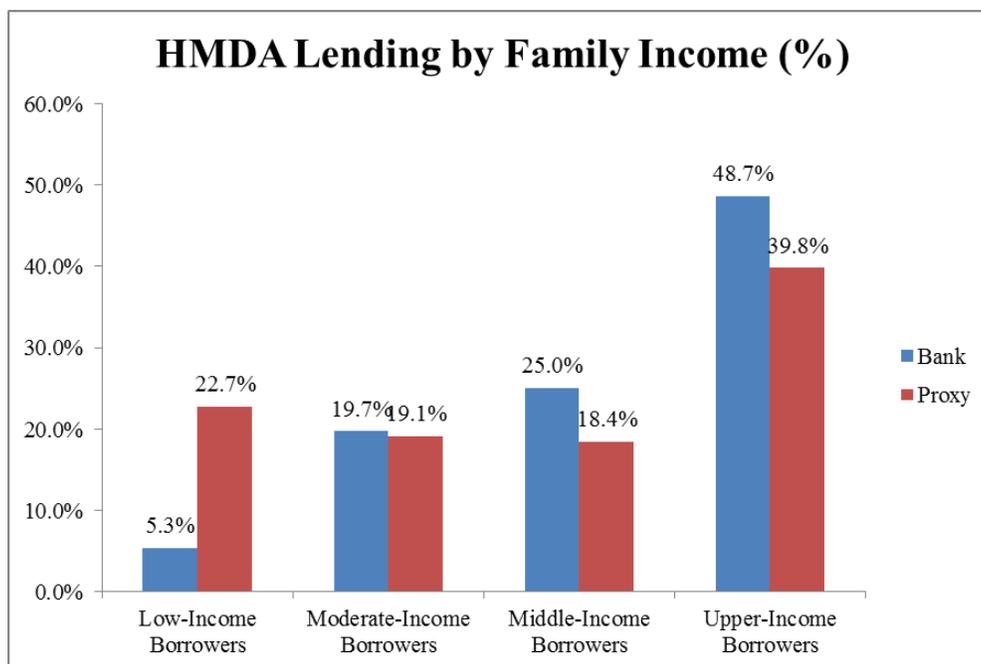
Borrower Distribution of Lending

HMDA lending is assigned the greatest weight due to the volume of lending. Overall, OVB's borrower distribution of lending performance in the Huntington-Ashland multi-state is considered adequate.

HMDA Lending

OVB's performance was compared to the income levels of families in the assessment area (proxy).

As shown in the chart below, OVB's HMDA lending by family income is significantly below proxy for low-income borrowers and exceeds proxy for moderate-income borrowers. Given the high poverty levels and low affordability of homes in the assessment area, home purchase lending among borrowers of different incomes is considered good.



Geographic Distribution of Lending

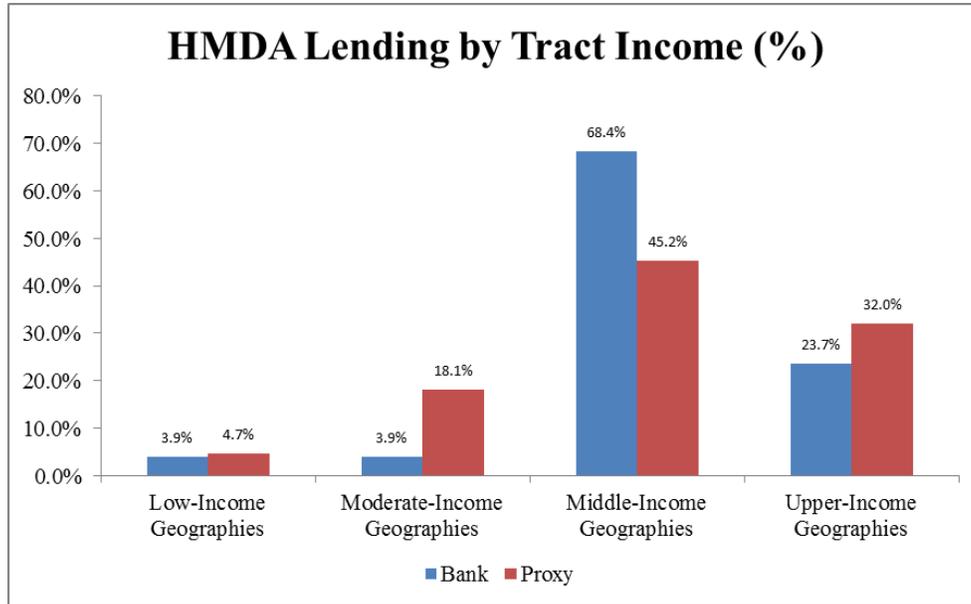
In 2016, OVB made loans in one of the four low-income census tracts (25.0%) in the Huntington-Ashland multi-state and six of the 10 moderate-income tracts (60.0%). Overall, OVB made loans in 17 of the 29 census tracts (58.6%) in the assessment area. OVB does not have any branches in low- or moderate-income census tracts in the Huntington-Ashland multi-state, as Downtown Huntington, where the majority of the assessment area’s low-income tracts are located, is a heavily banked area and competition is high. OVB ranks 10th out of 13 institutions in the assessment area in deposit market share with only 2.10% of deposits.

Overall, OVB’s distribution of lending among geographies is considered adequate.

HMDA Lending

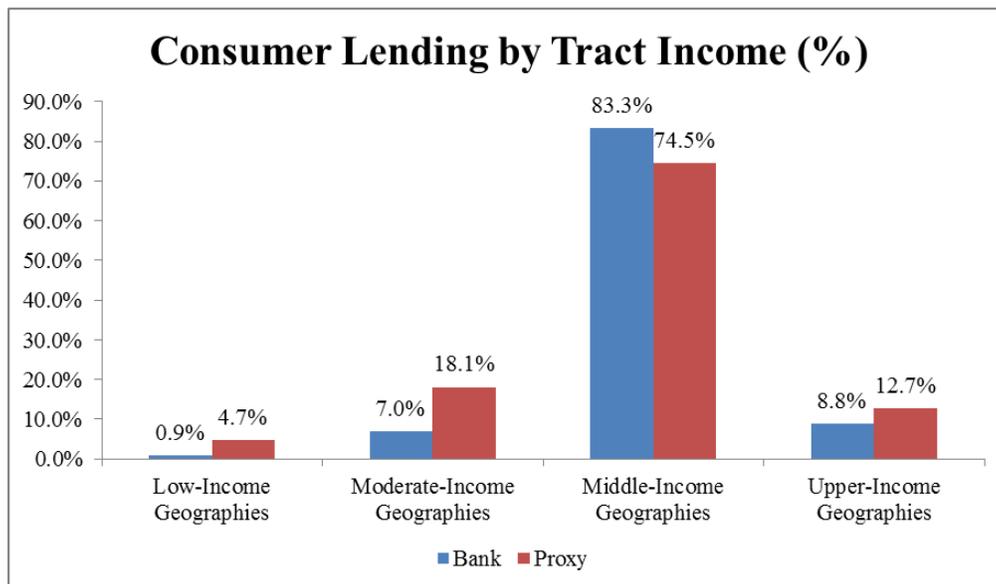
During the evaluation period, OVB made 76 HMDA loans comprised of 36 home purchase (47.3%), 14 refinance (18.4%), and 25 home improvement (32.9%) loans. OVB’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). Poverty levels, lack of affordability, and general economic conditions in the assessment area, which provide limited lending opportunities, were also considered as part of the evaluation.

The bank’s performance compared favorably to the proxy in the low-income areas, but performed significantly worse than proxy in the moderate-income areas. OVB’s geographic distribution of HMDA loans is considered adequate.



Consumer Lending

OVB originated 114 consumer loans within the assessment area during the review period. OVB’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). As shown in the graph below, OVB’s lending in low- and moderate-income tracts is significantly below proxy. OVB’s geographic distribution of consumer lending is considered adequate.



Community Development Test

OVB's community development performance demonstrated an adequate level of responsiveness to the needs of the assessment area through community development investments and services, considering the bank's capacity and the need and availability of community development opportunities in the assessment area.

Qualified Investments

OVB made two grants in this assessment area totaling \$10,090. One donation of \$10,000 was to a farmer's market, which accepts food vouchers, to aid in its expansion. OVB also made a donation to the local non-profit that provides affordable housing.

Community Development Services

Two of OVB's officers serve as board members for two non-profit community organizations which focus on services that benefit low- and moderate-income individuals.

**STATE OF OHIO
(Full-scope Review)**

CRA Rating for State of Ohio: “Satisfactory”

The Lending Test is rated: “Satisfactory”

The Community Development Test is rated: “Outstanding”

The major factors and criteria contributing to this rating include:

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

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN
NON-METROPOLITAN OHIO
(Full-scope Review)**

OVB's Non-metropolitan Ohio assessment area consists of the entireties of Gallia, Jackson, Meigs, Pike, and Vinton counties discussed below. This assessment area consists of a total of 29 census tracts comprising 14 moderate-income census tracts (48.3%) and 15 middle-income tracts (51.7%). All 15 middle-income tracts were considered distressed during this evaluation period. There are no low- or upper-income tracts in the assessment area. OVB has 12 branch locations, including the main office, in the assessment area.

Gallia County is located in southern Ohio along the Ohio River. Gallipolis is the largest city and county seat. The county had a population of 30,934, according to the 2010 U.S. Census.

Jackson County is located in southern Ohio and borders the northwest side of Gallia County. Jackson is the largest city and county seat. The county had a population of 33,225, according to the 2010 U.S. Census.

Meigs County is located in southern Ohio along the Ohio River. Meigs County borders Gallia County to the northeast. Pomeroy is the largest city and county seat. The county had a population of 23,770, according to the 2010 U.S. Census.

Pike County is located in southern Ohio and borders Jackson County to the east. Waverly is the largest city and county seat. The county had a population of 28,709, according to the 2010 U.S. Census.

Vinton County is located in southern Ohio and borders Gallia County to the north. McArthur is the largest city and county seat. The county had a population of 13,435, according to the 2010 U.S. Census.

According to the June 30, 2016 FDIC Deposit Market Share Report, OVB ranked first out of 12 institutions in the market with a deposit share of 32.41% in the assessment area.⁷

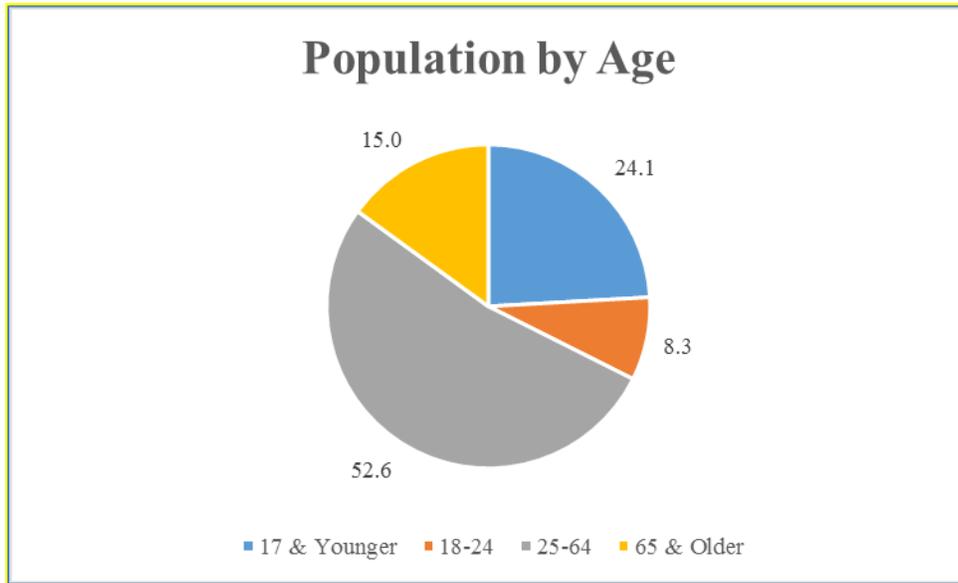
⁷ <http://www2.fdic.gov/sod/sodMarketBank.asp>

#	Financial Institution	Deposit Market Share
1	The Ohio Valley Bank Company	32.41%
2	Wesbanco, Inc.	13.39%
3	The Farmers Bank and Savings Company	10.29%
4	Peoples Bank	8.83%
5	The Vinton County National Bank	8.75%
6	The First National Bank of Waverly	8.33%
7	The Milton Banking Company	5.32%
8	U.S. Bank, National Association	4.53%
9	PNC Bank, National Association	3.54%
10	Home National Bank	2.81%

One community contact interview was conducted to provide information regarding credit needs of the local community and context to the demographic and economic characteristics discussed. The community contact provides services to those living in poverty in Gallia and Meigs counties. According to the contact, the economic conditions in the area are stable, but poor. The 2008 recession hit the area hard and many of the power plants along the Ohio River remain closed, reducing the number of available jobs in the region. The contact stated that additional income restrictions to qualify for mortgage loans have made it difficult for low- and moderate-income individuals to qualify for mortgage loans. The contact explained that the local banks are all very involved in the community and while the unbanked population is an issue, local banks are doing all that they can to serve the area.

Population Characteristics

According to the 2010 U.S. Census, the total population in the assessment area was 130,073. Approximately, 48.1% of the assessment area’s population resides in moderate-income tracts, while 52.0% reside in middle-income tracts. As shown in the chart below, 75.9% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 60.9% of the population is between the ages of 18 and 64 and more likely to have credit needs.



The population in Non-metropolitan Ohio is decreasing, as depicted in the following table that shows the actual and projected population change over the 2010 U.S. Census figure.⁸

County	2010 Population	2015 Population	Population Percent Change
Gallia (OH)	30,934	30,142	-2.6%
Jackson (OH)	33,225	32,596	-1.9%
Meigs (OH)	23,770	23,257	-2.2%
Pike (OH)	28,709	28,217	-1.7%
Vinton (OH)	13,435	13,048	-2.9%
Total	130,073	127,260	

Income Characteristics

According to HUD data, the 2010 median family income levels for Non-metropolitan Ohio was \$53,700. The 2015 and 2016 estimated median family income levels are detailed in the following table.⁹

Borrower Income Levels Ohio State Non-Metro

HUD Estimated Median Family Income	Low		Moderate		Middle		Upper	
	0	49.99%	50%	79.99%	80%	119.99%	120%	& above
2015	\$56,900	0 - \$28,449	\$28,450 - \$45,519	\$45,520 - \$68,279	\$68,280 - & above			
2016	\$55,400	0 - \$27,699	\$27,700 - \$44,319	\$44,320 - \$66,479	\$66,480 - & above			

⁸ http://www.development.ohio.gov/reports/reports_countytrends_map.htm

⁹ <http://www.huduser.org/portal/datasets/il/il13/index.html>

The assessment area contains 51,018 households, of which 35,378 (69.3%) are designated as families. Low- and moderate-income families represent 29.9% and 18.4% of all families in this assessment area, respectively, with 17.2% of families below the poverty level as compared to 10.3% of all families below the poverty level within Ohio.

Based on 2015 USDA data, household poverty rates for the counties in the assessment area were as follows:

County	2014 Poverty Rate	2015 Poverty Rate	Change
Gallia Co.	26.10%	21.70%	-16.86%
Jackson Co.	20.00%	20.40%	2.00%
Meigs Co.	22.60%	22.80%	0.88%
Pike Co.	21.90%	21.40%	-2.28%
Vinton Co.	23.70%	18.90%	-20.25%
State of Ohio	15.80%	14.80%	-6.33%
United States	15.50%	14.70%	-5.16%

The poverty rates for Gallia and Vinton counties have decreased at a higher rate than Ohio and the country. The poverty rate for Pike County also decreased, but at a lower rate than the state and country. However, poverty rates for Jackson and Meigs counties increased over the 12-month period.

Labor, Employment and Economic Characteristics

The following table illustrates the largest percentage of land use in each county in the assessment area:⁴

County	Urban	Cropland	Pasture	Forest	Open Water	Bare Mines	Wetlands
Gallia	7.82%	7.23%	19.35%	59.23%	0.81%	0.45%	0.09%
Jackson	8.12%	4.07%	18.46%	60.87%	0.44%	0.61%	0.03%
Meigs	7.39%	3.74%	18.44%	67.54%	0.96%	0.27%	0.05%
Pike	6.70%	9.90%	13.87%	58.12%	0.69%	0.20%	0.01%
Vinton	6.19%	3.39%	8.23%	77.54%	0.44%	0.65%	0.07%

Only 7.8% of the land in Gallia County, 8.1% of the land in Jackson County, 7.4% of the land in Meigs County, 6.7% of the land in Pike County, and 6.2% of the land in Vinton County is considered urban, which includes land used for residential, commercial, industrial, or transportation purposes or as urban grasses. The remaining amount of land that does not contain housing, businesses, and schools may impact OVB's ability to originate all types of loans in this assessment area.

According to the Ohio Office of Policy, Research, and Strategic Planning, the largest industries by average employment are trade, transportation, and utilities; education and health services; and other services. The following table identifies the employment sectors and major employers in the bank's assessment area, but is not limited to the following:¹⁰

¹⁰ http://www.development.ohio.gov/reports/reports_countytrends_map.htm

County	Primary Employment Sectors	Major Employers
Gallia	Trade, Transportation, & Utilities; Other Services; Education and Health Services; Financial Services; Leisure and Hospitality	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; State of Ohio; University of Rio Grande; Wal-Mart Store Inc.
Jackson	Trade, Transportation, & Utilities; Other Services; Education and Health Services; Professional and Business Services; Financial Services	Bellisio Foods Inc; General Mills Inc; Holzer Medical Center; Jackson City Schools; Osco Industries Inc; Wal-Mart Stores Inc; Wellston City Schools
Meigs	Trade, Transportation, & Utilities; Education and Health Services; Construction; Professional and Business Services; Other Services	Eastern Local Schools; Extencicare/Rocksprings Rehab Center; Gatling Ohio LLC; Meigs County Government; Meigs Local Schools; Overbrook Rehab Center; Southern Local Schools
Pike	Professional and Business Services; Education and Health Services; Trade, Transportation, and Utilities; Leisure and Hospitality; Manufacturing	Eastern Local Schools; Ohio Valley Electric Corp; Pike Community Hospital; Pike County Government; Pike County JVS; Pleasant Hill Manor; Scioto Valley Local Schools; USEC/United States Enrichment Corp; Wal-Mart Stores Inc; Waverly Care Center; Waverly City Schools; Western Local Schools
Vinton	Trade, Transportation, & Utilities; Other Services; Education and Health Services	Austin Powder Co; Crownover Lumber Co Inc; Huston Nursing Home; State of Ohio; Vinton County Government; Vinton County Local Schools; Vinton County National Bank

The following table shows the 2015 and 2016 average annual unemployment rate for Gallia, Jackson, Meigs, Pike, and Vinton counties, as well as Ohio and the national average.

Unemployment Rates
Ohio Valley Bank: OH Non MSA

Area	Years - Annualized	
	2015	2016
Gallia Co.	6.4	6.2 (P)
Jackson Co.	7.7	7.3 (P)
Meigs Co.	8.2	7.4 (P)
Pike Co.	7.6	7.4 (P)
Vinton Co.	6.9	7.0 (P)
Ohio	4.7 (D)	4.8 (D)
National	4.8	4.5

Not Seasonally Adjusted, Data Extracted on April 21, 2017

D: Reflects revised population controls and model reestimation

P: Preliminary

The unemployment rate for all counties in the assessment area was higher than Ohio for both years. All counties except for Vinton County experienced a decline in the unemployment rate between the two years.

Housing Characteristics

There are 58,295 housing units in this assessment area, based on the 2010 U.S. Census. Within this assessment area, 64.0% of the units are owner-occupied, 23.5% are rental units, and 12.5% are vacant. 48.1% and 51.9% of all owner-occupied housing units are located in moderate-and middle- income census tracts, respectively, suggesting adequate opportunity for mortgage credit in moderate-income geographies.

The median age of housing stock was 35 years, according to the 2010 U.S. Census, with 23.1% of housing built prior to 1950. Older homes such as these are typically more likely to require repairs and rehabilitation. The median housing value in the assessment area was \$89,448, with an affordability ratio of 39.0%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Further, based on the 2016 median family income for Non-metropolitan Ohio (\$55,400), approximately 57.4% of the homes valued up to \$101,536 in the assessment area would be considered affordable for low-income individuals and 79.5% of the homes valued up to \$162,458 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

According to Sperling's Best Places, the 2016 median home cost in Gallia County was \$88,400, a depreciation of 12.3% over the prior year.¹¹ The 2016 median home cost in Jackson County was \$86,200, an appreciation of 13.1% since the prior year. The 2016 median home cost in Meigs County was \$78,900, an appreciation of 3.1% over the prior year. The 2016 median home cost in Pike County was \$88,400, a decline of 5.2% over the prior year. Lastly, the 2016 median home cost in Vinton County was \$75,400, an appreciation of 3.1% over the prior year.

One in every 2,666 properties in Gallia County and one in every 6,623 properties in Pike County was in foreclosure in April 2017. These rates were higher than Ohio's ratio of one in every 1,269 properties.¹² Foreclosure information for Jackson, Meigs, and Vinton counties was not available.

The median gross rent in the assessment area was \$545, with 13.7% of the rental units having rents of less than \$350 a month, according to the 2010 U.S. Census. The majority of rents (27.2%) in this assessment area were \$500-\$699 per month and 20.2% of rents were \$350-\$499, while 21.6% of rents were greater than \$700. Nearly one-quarter of all housing units in the assessment area are rental units. Additionally, 44.9% of renters have rent costs greater than 30.0% of their income.

The table on the following illustrates the demographics in Non-metropolitan Ohio.

¹¹ Sperling's Best Places, www.bestplaces.net

¹² www.realtytrac.net

Combined Demographics Report

Assessment Area(s): OH Non MSA 2016

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	10,563	29.9
Moderate-income	14	48.3	17,459	49.3	3,337	19.1	6,505	18.4
Middle-income	15	51.7	17,919	50.7	2,737	15.3	6,973	19.7
Upper-income	0	0	0	0	0	0	11,337	32
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	29	100.0	35,378	100.0	6,074	17.2	35,378	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	28,091	17,927	48.1	63.8	6,585	23.4	3,579	12.7
Middle-income	30,204	19,374	51.9	64.1	7,132	23.6	3,698	12.2
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	58,295	37,301	100.0	64.0	13,717	23.5	7,277	12.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,780	44.4	1,586	43.9	118	44.5	76	58
Middle-income	2,225	55.6	2,023	56.1	147	55.5	55	42
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	4,005	100.0	3,609	100.0	265	100.0	131	100.0
Percentage of Total Businesses:			90.1		6.6		3.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	165	52.2	163	51.9	2	100	0	0
Middle-income	151	47.8	151	48.1	0	0	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	316	100.0	314	100.0	2	100.0	0	.0
Percentage of Total Farms:			99.4		.6		.0	

2016 FFIEC Census Data and 2016 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN OHIO

Lending Test

Lending performance in the Non-Metropolitan Ohio assessment area is considered reasonable.

The greatest consideration, based on number and volume, was given to HMDA lending, followed by consumer and small business lending.

In addition, OVB's lending performance was compared to the 2015 aggregate performance of all lenders required to report HMDA data within the respective assessment areas.

Details of OVB's HMDA, consumer, and small business lending can be found in the tables in Appendix B.

Borrower Distribution of Lending

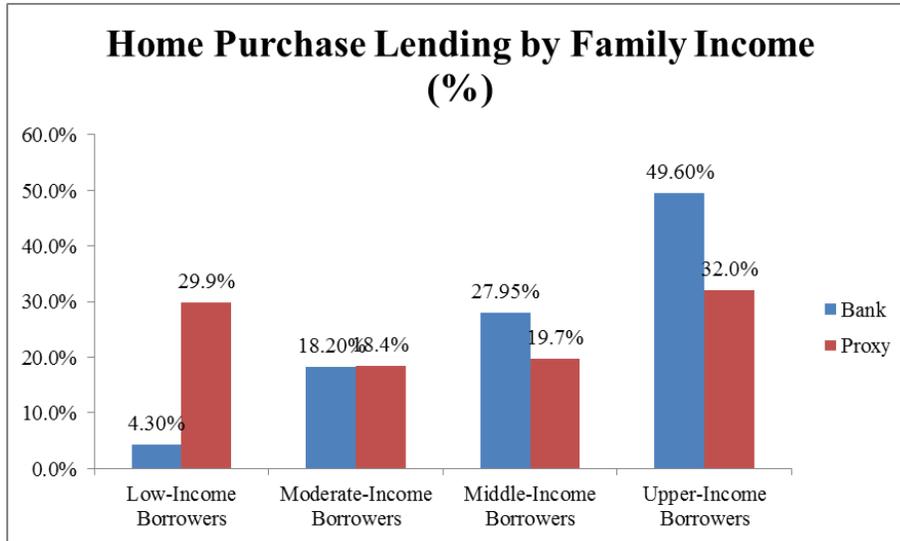
Based on lending volume, more weight was given to HMDA lending when considering borrower distribution in this assessment area. Overall, OVB's borrower distribution of lending performance in Non-metropolitan Ohio is considered adequate.

HMDA Lending

OVB's performance was compared to the income levels of families in the assessment area (proxy).

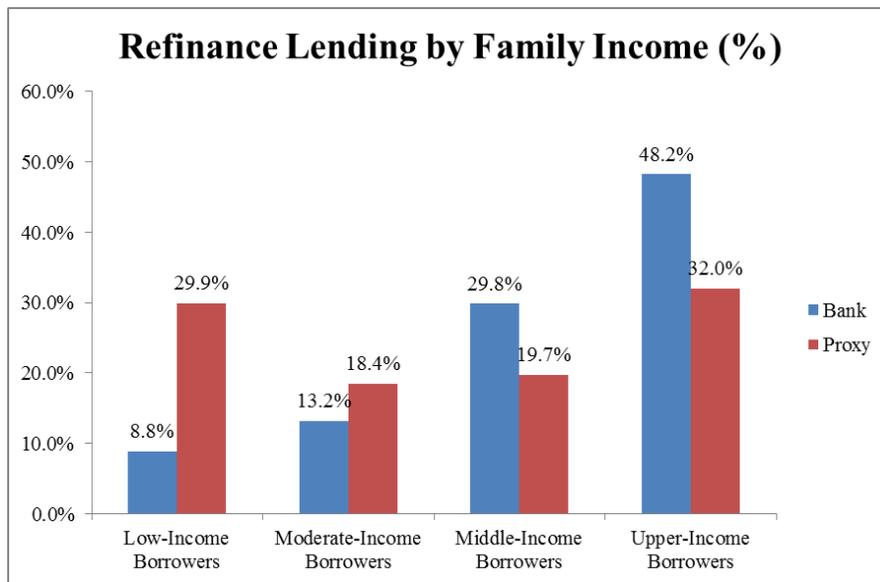
Home Purchase

As shown in the chart below, OVB's home purchase lending by family income is significantly below proxy for low-income borrowers. Lending is significantly improved for moderate-income borrowers and is well in line with proxy. Given the high poverty levels and low affordability of homes in the assessment area, home purchase lending among borrowers of different incomes is adequate.



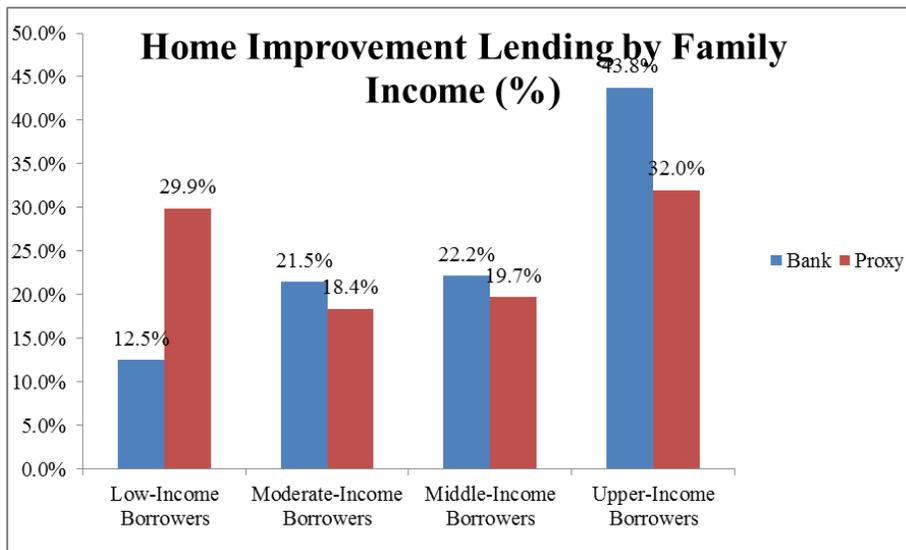
Refinance

As shown in the chart below, OVB’s refinance lending by family income is significantly below proxy for low-income borrowers. Lending to moderate-income borrowers is also below proxy. Given the high poverty levels and low affordability of homes in the assessment area, refinance lending among borrowers of different incomes is adequate.



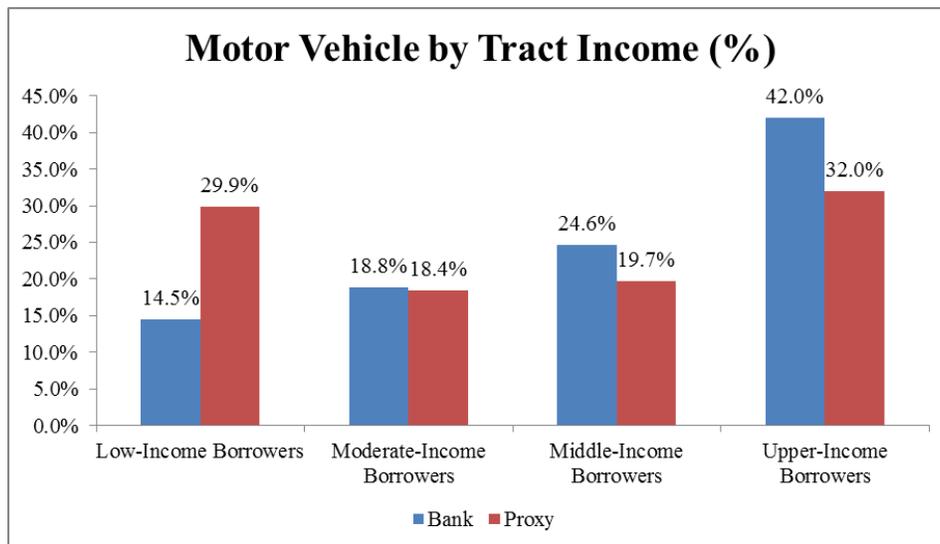
Home Improvement

As shown in the chart below, OVB’s home improvement lending by family income is significantly below proxy for low-income borrowers. Lending is significantly improved for moderate-income borrowers and exceeds proxy. Given the high poverty levels and low affordability of homes in the assessment area, home improvement lending among borrowers of different incomes is adequate.



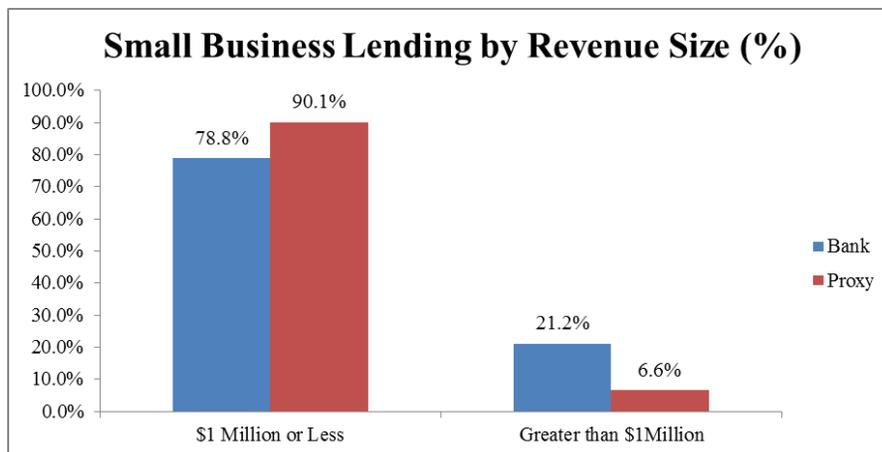
Consumer Lending (Motor Vehicle)

As shown in the following chart, OVB’s consumer lending to low-income borrowers was substantially lower than the percentage of households (proxy), but exceeded proxy for moderate-income borrowers and is considered good.

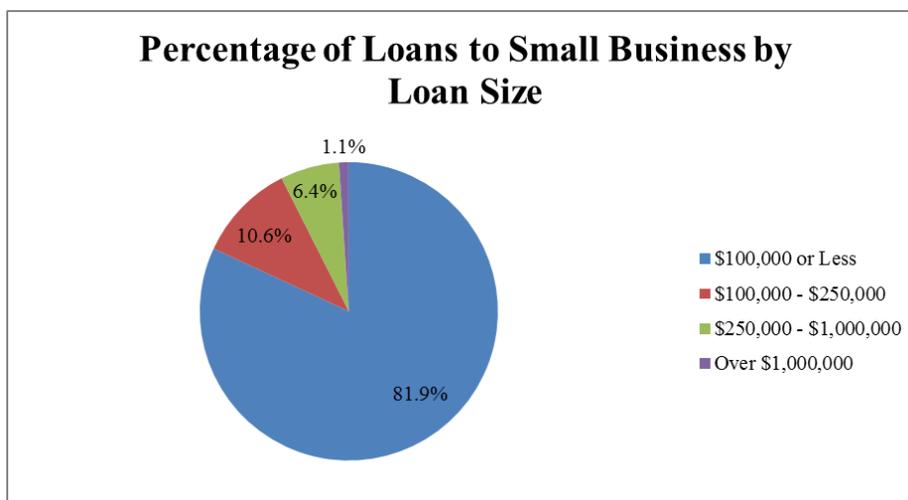


Small Business Lending

As depicted in the graph below, OVB’s lending to businesses with revenue of \$1 million or less (78.8%) is below the percentage of such businesses in the assessment area at 90.1%, which is the proxy.



Further analysis of small business lending shows 81.9% of OVB’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. The borrower distribution for small business lending is considered good.



Geographic Distribution of Lending

OVB made loans in all of the 14 moderate-income census tracts (100.0%) in Non-metropolitan Ohio and all of the 15 middle-income tracts (100.0%). Overall, OVB penetrated 100.0% of the income tracts in the assessment area. OVB has four branches in moderate-income census tracts and eight branches in middle-income census tracts in the assessment area.

Overall, OVB’s distribution of lending among geographies is considered adequate.

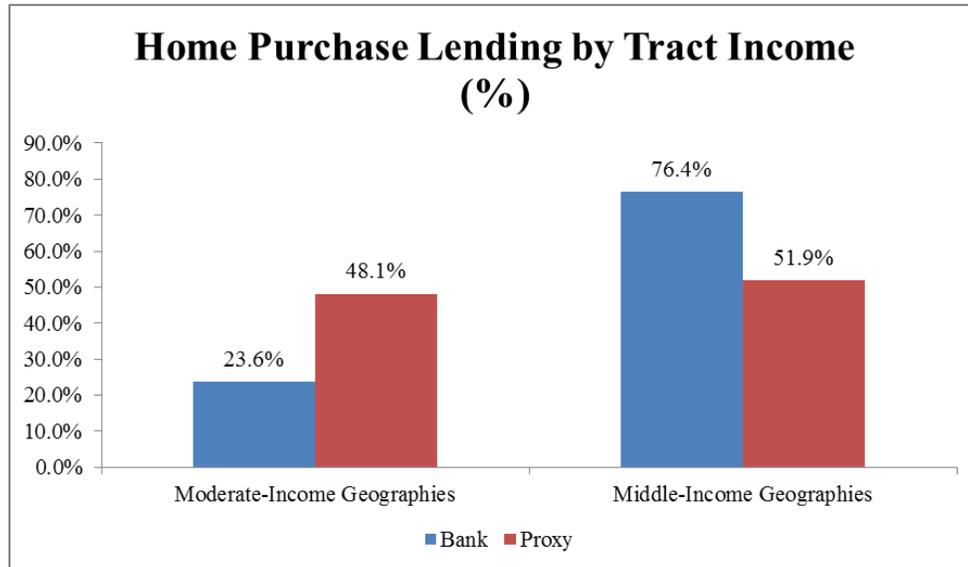
HMDA Lending

During the evaluation period, OVB made 639 HMDA loans comprised of 364 home purchase (57.1%), 119 refinance (18.7%), and 154 home improvement (24.2%) loans. OVB’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy).

Poverty levels, lack of affordability, and general economic conditions in the assessment area, which provide limited lending opportunities, were also considered as part of the evaluation.

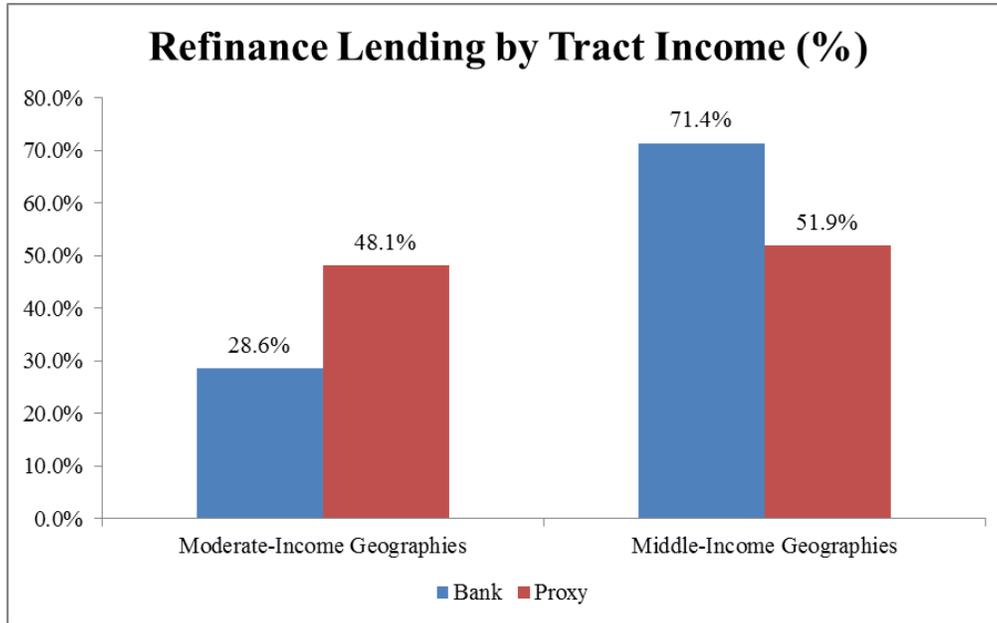
Home Purchase

OVB's lending in the moderate-income tracts was below proxy, but exceeded proxy in the middle-income tracts. This may be due in part to the high percentage of rental units within the moderate-income tracts at 23.4%. OVB's geographic distribution of home purchase loans is considered adequate.



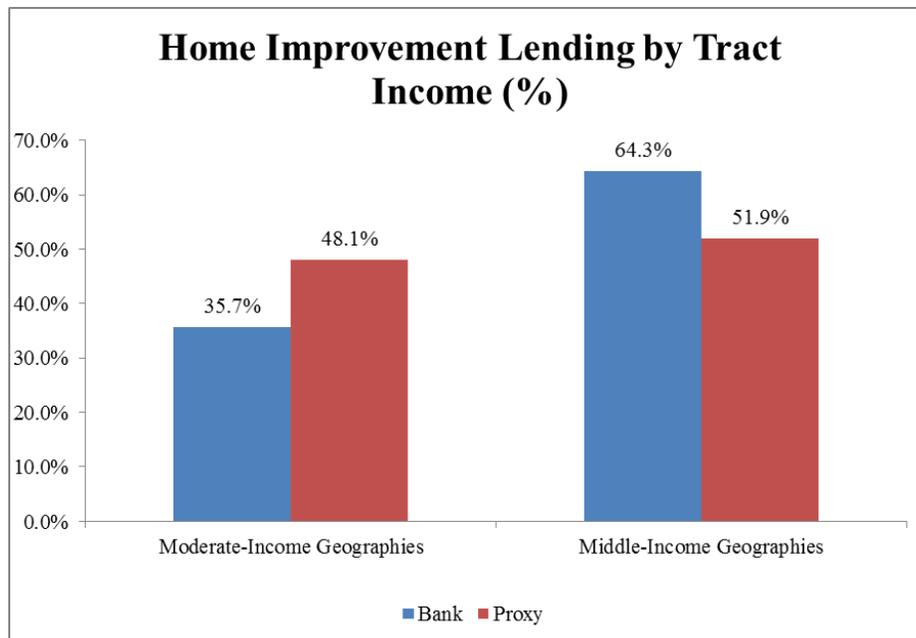
Refinance

OVB's lending in the moderate-income tracts was below proxy, but exceeded proxy in the middle-income tracts. This may be in part to the high percentage of rental units within the moderate-income tracts at 23.4%. OVB's geographic distribution of refinance loans is considered adequate.



Home Improvement

OVB's lending in moderate-income areas was below proxy, but exceeded proxy in the middle-income areas. This may be in part to the high percentage of rental units within the moderate-income tracts (23.4%). OVB's geographic distribution of home improvement loans is considered adequate.

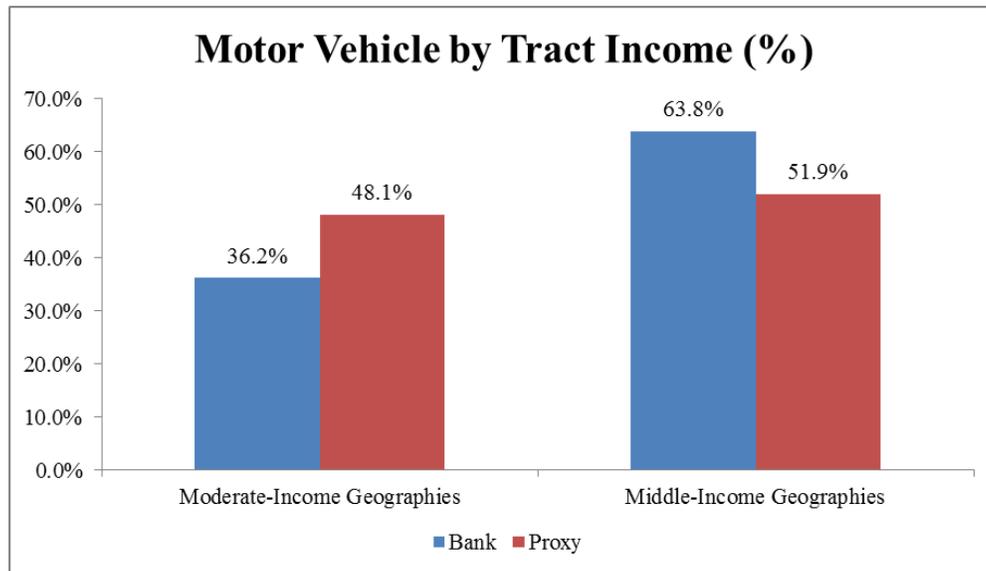


Consumer Lending

OVB originated 2,401 consumer loans within the assessment area during the review period comprising 1,159 motor vehicle (48.3%), 617 other-secured (25.7%), and 625 other-unsecured (26.0%) loans. OVB's performance was compared to the number of owner-occupied housing units in the assessment area (proxy).

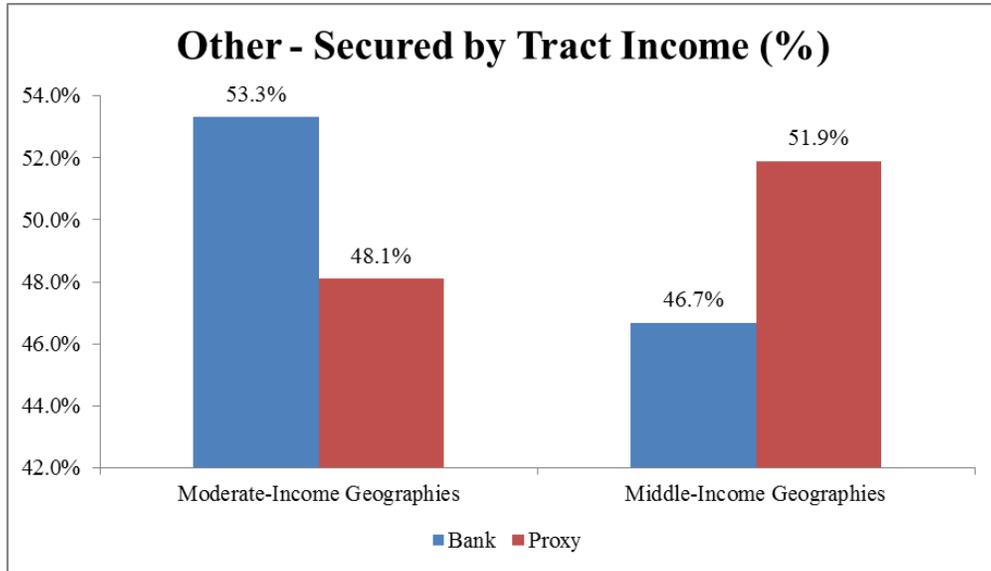
Motor Vehicle

OVB originated 1,159 motor vehicle loans within the assessment area during the review period. OVB's performance was compared to the number of owner-occupied housing units in the assessment area (proxy). As shown in the graph below, OVB's lending in moderate-income tracts is slightly below proxy and lending in middle-income tracts exceeds proxy. OVB's geographic distribution of motor vehicle lending is considered good.



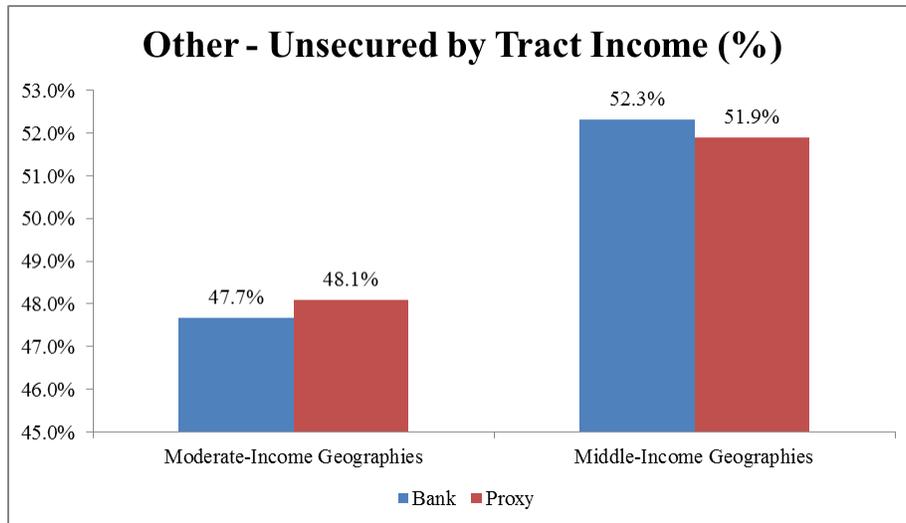
Other – Secured

OVB originated 617 other-secured loans within the assessment area during the review period. OVB's performance was compared to the number of owner-occupied housing units in the assessment area (proxy). As shown in the graph below, OVB's lending in moderate-income tracts is well above proxy. OVB's geographic distribution of other-secured lending is considered excellent.



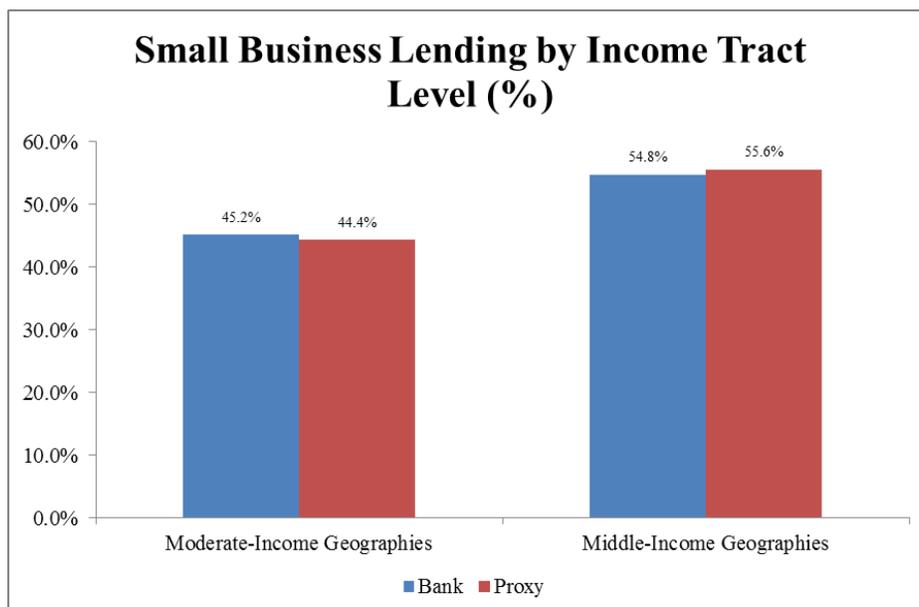
Other – Unsecured

OVB originated 625 other-unsecured loans within the assessment area during the review period. OVB’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). As shown in the graph below, OVB’s lending in moderate-income tracts is very close to proxy for moderate-income borrowers and exceeds proxy for middle-income borrowers. OVB’s geographic distribution of other-unsecured lending is considered excellent.



Small Business Lending

OVB originated 188 small business loans in the assessment area during the review period. As depicted in the following graph, OVB exceeded the proxy (percent of total business in the assessment area with revenue of \$1 million or less) in moderate-income census tracts. Therefore, the geographic distribution of small business lending is considered excellent.



Community Development Test

OVB's community development performance demonstrated an excellent level of responsiveness to the needs of the assessment area through community development loans, investments and services, considering the bank's capacity and the need and availability of community development opportunities in the assessment area.

Community Development Lending

OVB made nine community development loans totaling \$4.43 million in the assessment area since the previous evaluation. The community development loans are responsive to the community developments needs of the assessment area. Three of the loans were to revitalize and stabilize distressed moderate income areas, three were related to affordable housing, two promoted economic development by financing small business purchases, and one loan was targeted to provide community services to low- or moderate-income individuals.

Qualified Investments

OVB made ten community development investments totaling \$11.85 million in the assessment area. The community development investments are responsive to the community developments needs of the assessment area. One of these investments was to a local fire department in a distressed middle income tract to purchase a new fire truck. The remaining investments were part of the Federal Home Loan Bank's Economic Development Advance Program designed for banks engaged in lending for economic development purposes.

OVB also made significant grants to organizations within the assessment area since the previous evaluation. Large grants of note include a \$23,450 donation to the non-profit community organization in Gallipolis to replace a collapsed roof and a total of \$32,000 in grants to a shelter for those addicted to drugs. Also, a donation of \$25,000 was made to a mental health shelter that serves low- and moderate-income individuals.

Community Development Services

Overall, OVB provides a high level of community development services in Non-metropolitan Ohio. The community development services are responsive to the community developments needs of the assessment area. OVB'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 financial literacy and board and committee memberships.

**STATE OF WEST VIRGINIA
(Full-scope Review)**

CRA Rating for State of West Virginia: “Satisfactory”

The Lending Test is rated: “Satisfactory”

The Community Development Test is rated: “Outstanding”

The major factors and criteria contributing to this rating include:

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

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN
NON-METROPOLITAN WEST VIRGINIA
(Full-scope Review)**

OVB’s Non-Metropolitan West Virginia assessment area consists of the entirety of Mason County. This assessment area consists of a total of six census tracts comprising one moderate-income census tract (16.7%), four middle-income tracts (66.7%), and one upper-income tract (16.7%). All of the four middle-income tracts were considered distressed during this evaluation period. There are no low-income tracts in the assessment area. OVB has one branch location, located in the upper income tract, in the assessment area.

Mason County is located in extreme western West Virginia along the Ohio River. Point Pleasant is the largest city and county seat. The county had a population of 27,324, according to the 2010 U.S. Census.

According to the June 30, 2016 FDIC Deposit Market Share Report, OVB ranked second out of five institutions in the market with a deposit share of 24.23% in Mason County.¹³

#	Financial Institution	Deposit Market Share
1	City National Bank of West Virginia	27.22%
2	The Ohio Valley Bank Company	24.23%
3	Peoples Bank	23.94%
4	The Farmers Bank and Savings Company	18.36%
5	Branch Banking and Trust Company	6.25%

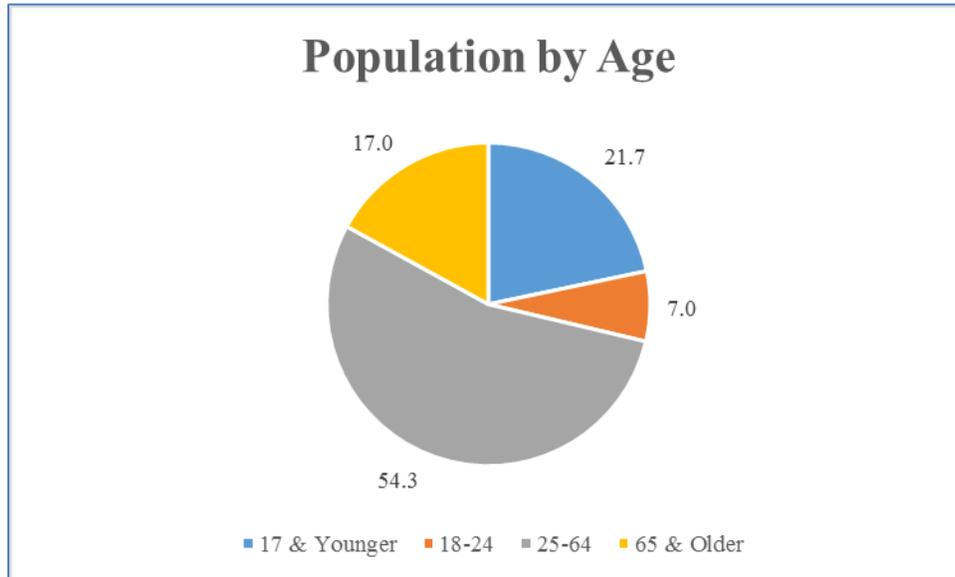
One community contact interview was conducted to provide additional information regarding credit needs of the local community and context to the demographic and economic characteristics discussed. The contact works as a fund manager to disperse donated funds between 68 charitable grants or scholarships supporting the local community in Mason County. The contact stated the current economic conditions of the area were still poor due in part to the closure of many of the power plants on the Ohio River. Although some counties have seen some of the power plants in their area re-open, Mason County has not. Drugs are also a significant problem in the county, as 1 in 5 babies in Mason County are born with a drug addiction. The poverty rate in Mason County is higher than the state average and the median income level is below the state average. The demographics do not include significant minority populations and the area is over 90% Caucasian. The contact explained that local banks are very involved in the community and do everything they can to lend to qualified applicants, but many new regulations have made it difficult for banks to lend. For example, many residents do not have two years of work history, which can be a requirement for a loan.

Population Characteristics

According to the 2010 U.S. Census, the total population in the assessment area was 27,324. Approximately, 10.4% of the assessment area’s population resides in moderate-income tracts, while 70.5% reside in middle-income tracts and 19.2% reside in upper-income tracts. As shown in the chart below, 78.3% of the population is 18 years of age or older, which is the legal age to enter into a

¹³ <http://www2.fdic.gov/sod/sodMarketBank.asp>

contract, while 61.3% of the population is between the ages of 18 and 64 and more likely to have credit needs.



The population in Non-metropolitan West Virginia assessment area is decreasing, as depicted in the following table, which shows the actual and projected population change over the 2010 U.S. Census figure.¹⁴

County	2010 Population	2015 Population	Population Percent Change
Mason (WV)	27,324	27,037	-1.1%
Total	27,324	27,037	

Income Characteristics

According to HUD data, the 2010 median family income levels for Non-metropolitan West Virginia was \$43,400. The 2015 and 2016 estimated median family income levels are detailed in the following table.¹⁵

Borrower Income Levels West Virginia State Non-Metro

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2015	\$48,900	0 - \$24,449	\$24,450 - \$39,119	\$39,120 - \$58,679	\$58,680 - & above
2016	\$48,300	0 - \$24,149	\$24,150 - \$38,639	\$38,640 - \$57,959	\$57,960 - & above

¹⁴ http://www.development.ohio.gov/reports/reports_countytrends_map.htm

¹⁵ <http://www.huduser.org/portal/datasets/il/il13/index.html>

The assessment area contains 10,932 households, of which 7,594 (69.5%) are designated as families. Low- and moderate-income families represent 21.5% and 18.4% of all families in this assessment area, respectively, with 14.6% of families below the poverty level as compared to 12.8% of all families below the poverty level within West Virginia.

Based on 2015 USDA data, household poverty rates for the counties in the assessment area were as follows:

County	2014 Poverty Rate	2015 Poverty Rate	Change
Mason Co.	20.60%	22.30%	8.25%
State of West Virginia	18.30%	18.00%	-1.64%
United States	15.50%	14.70%	-5.16%

The poverty rate for Mason County has increased, while both the rates for West Virginia and the country have decreased.

Labor, Employment and Economic Characteristics

According to the West Virginia Department of Commerce, the largest industries by average employment are health care and social services, education, retail, and public administration. The following table identifies the employment sectors and major employers in OVB's assessment area, but is not limited to the following:¹⁶

County	Primary Employment Sectors	Major Employers
Mason	Health Care and Social Services, Education, Retail, Public Administration	Pleasant Valley Hospital Inc; Indiana Michigan Power Company; Wal-Mart Associates Inc; Appalachian Power Company; Felman Production Inc; Lakin State Hospital; M&G Polymers USA Inc; Lakin Correctional Facility; Bob's Market & Greenhouse Inc

The following table shows the 2015 and 2016 average annual unemployment rate for Mason County, West Virginia, and the country.

Unemployment Rates Ohio Valley Bank: WV Non MSA

Area	Years - Annualized	
	2015	2016
Mason Co.	6.9	6.0 (P)
West Virginia	5.9 (D)	5.1 (D)
National	4.8	4.5

Not Seasonally Adjusted, Data Extracted on April 21, 2017

D: Reflects revised population controls and model reestimation

P: Preliminary

¹⁶ <http://westvirginia.gov/community-profile.html>

The unemployment rate for Mason County was higher than West Virginia for both years. The county experienced a decline in the unemployment rate between the two years, as did West Virginia and the country as a whole.

Housing Characteristics

There are 12,893 housing units in this assessment area, based on the 2010 U.S. Census. Within this assessment area, 66.2% of the units are owner-occupied, 18.6% are rental units, and 15.2% are vacant. Only 10.3% of all owner-occupied housing units are located in moderate-income census tracts, respectively, suggesting limited opportunity for mortgage credit in moderate-income geographies.

The median age of housing stock was 38 years, according to the 2010 U.S. Census, with 23.2% of housing built prior to 1950. Older homes such as these are typically more likely to require repairs and rehabilitation. The median housing value in the assessment area was \$79,427, with an affordability ratio of 45.2%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Further, based on the 2016 median family income for Non-metropolitan West Virginia (\$48,300), approximately 58.2% of the homes valued up to \$88,523 in the assessment area would be considered affordable for low-income individuals and 80.7% of the homes valued up to \$141,638 would be considered affordable for moderate-income individuals. These percentages were calculated assuming a housing expense ratio equal to 28.0% of gross income for a 4.0% fixed-rate, 30-year loan.

According to Sperling's Best Places, the 2016 median home cost in Mason County was \$77,000, a depreciation of 12.3% over the prior year.¹⁷

Foreclosure information for Mason County was not available at the time of this evaluation.¹⁸

The median gross rent in the assessment area was \$490, with 18.9% of the rental units having rents of less than \$350 a month, according to the 2010 U.S. Census. The majority of rents (26.6%) in this assessment area were \$500-\$699 per month and 20.4% of rents were \$350-\$499, while 8.4% of rents were greater than \$700. 18.6% of all housing units in the assessment area are rental units. Additionally, 36.7% of renters have rent costs greater than 30.0% of their income.

The table on the following page illustrates the demographics in Non-metropolitan West Virginia.

¹⁷ Sperling's Best Places, www.bestplaces.net

¹⁸ www.realtytrac.net

Combined Demographics Report

Assessment Area(s): WV Non MSA 2016

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	1,635	21.5	
Moderate-income	1	16.7	811	10.7	255	31.4	1,399	18.4	
Middle-income	4	66.7	5,534	72.9	744	13.4	1,517	20	
Upper-income	1	16.7	1,249	16.4	112	9	3,043	40.1	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	6	100.0	7,594	100.0	1,111	14.6	7,594	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	1,331	880	10.3	66.1	251	18.9	200	15	
Middle-income	9,262	6,223	72.9	67.2	1,479	16	1,560	16.8	
Upper-income	2,300	1,436	16.8	62.4	663	28.8	201	8.7	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	12,893	8,539	100.0	66.2	2,393	18.6	1,961	15.2	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	50	8.7	48	9.2	1	3	1	4.5	
Middle-income	306	53.1	272	52.2	21	63.6	13	59.1	
Upper-income	220	38.2	201	38.6	11	33.3	8	36.4	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	576	100.0	521	100.0	33	100.0	22	100.0	
Percentage of Total Businesses:				90.5		5.7		3.8	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	6	10.2	6	10.3	0	0	0	0	
Middle-income	51	86.4	50	86.2	1	100	0	0	
Upper-income	2	3.4	2	3.4	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	59	100.0	58	100.0	1	100.0	0	.0	
Percentage of Total Farms:				98.3		1.7		.0	

2016 FFIEC Census Data and 2016 D&B Information

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

Lending Test

Lending performance in the Non-metropolitan West Virginia assessment area is considered reasonable.

The greatest consideration, based on number and volume, was given to HMDA lending, followed by consumer lending. Small business lending was not considered due to the low volume of originations. In addition, OVB's lending performance was compared to the 2015 aggregate performance of all lenders required to report HMDA data within the respective assessment areas.

Details of OVB's HMDA, consumer, and small business lending can be found in the tables in Appendix B.

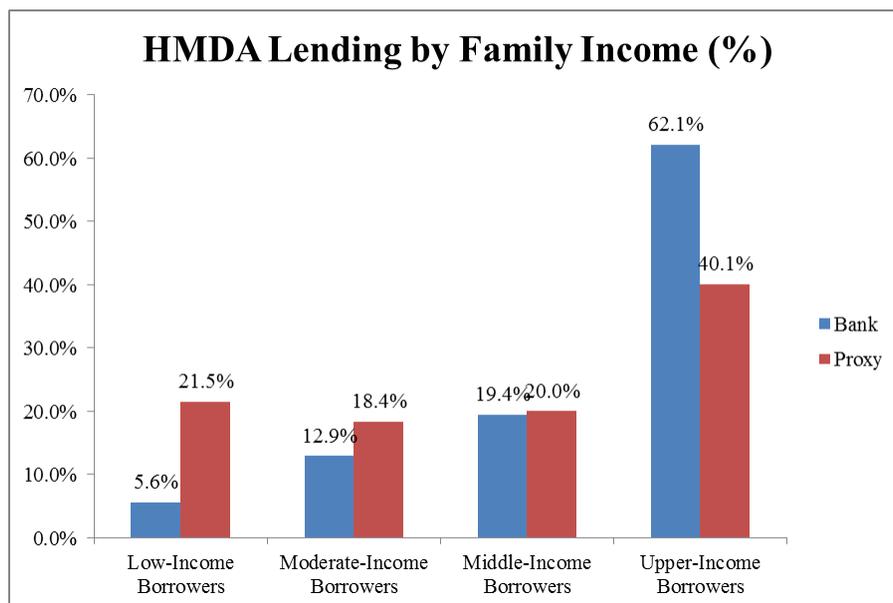
Borrower Distribution of Lending

Based on lending volume, more weight was given to HMDA lending when considering borrower distribution in this assessment area. Overall, OVB's borrower distribution of lending performance in Non-metropolitan West Virginia is considered adequate.

HMDA Lending

OVB's performance was compared to the income levels of families in the assessment area (proxy).

As shown in the chart below, OVB's HMDA lending by family income is significantly below proxy for low-income borrowers. Lending to moderate-income borrowers is also below proxy. However, given the high poverty levels and low affordability of homes in the assessment area, HMDA lending among borrowers of different incomes is good.



Geographic Distribution of Lending

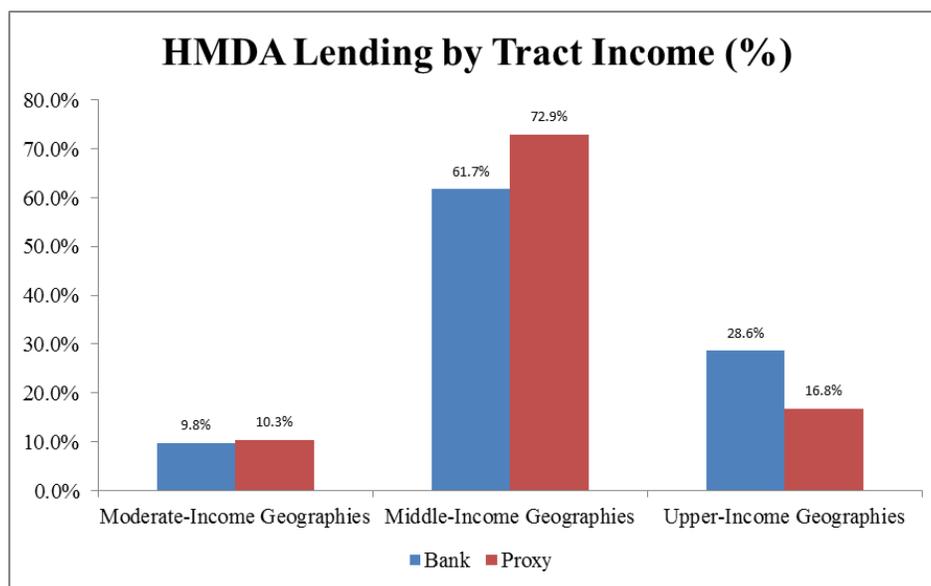
OVB made loans in the one moderate-income census tract (100.0%) in Non-metropolitan Ohio, all of the four middle-income tracts (100%), and the one upper-income tract (100%), penetrating 100.0% of the income tracts in the assessment area. OVB has one branch in the upper-income census tract in the assessment area.

Overall, OVB’s distribution of lending among geographies is considered adequate.

HMDA Lending

During the evaluation period, OVB made 133 HMDA loans comprised of 83 home purchase (62.4%), 36 refinance (27.1%), and 14 home improvement (10.5%) loans. OVB’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). Poverty levels, lack of affordability, and general economic conditions in the assessment area, which provide limited lending opportunities, were also considered as part of the evaluation.

As shown in the chart below, the bank and proxy performed similarly in the moderate-income areas. This may, in part, be attributed to economic conditions and low affordability (45.2%) in the assessment area. OVB’s geographic distribution of HMDA lending is considered good.

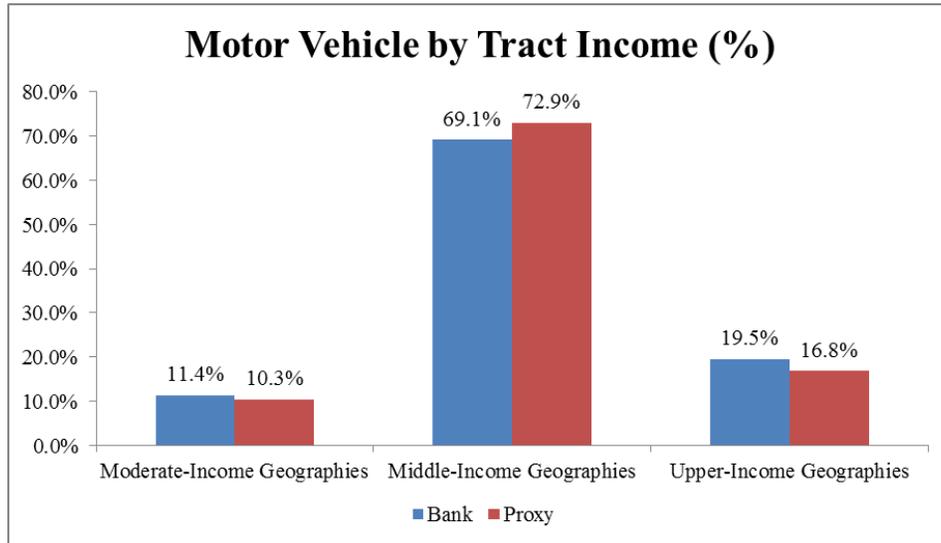


Consumer Lending

OVB originated 459 consumer loans within the assessment area during the review period. These loans were comprised of 246 motor vehicle (53.6%), 52 other-secured (11.3%), and 161 other-unsecured (35.1%) loans. OVB’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy).

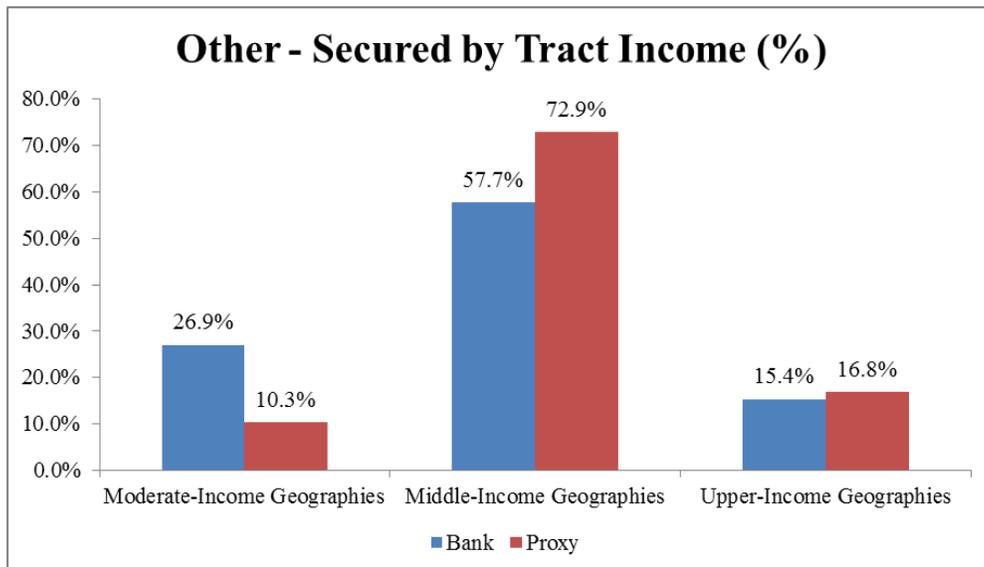
Motor Vehicle

OVB originated 246 motor vehicle loans within the assessment area during the review period. OVB’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). As shown in the graph below, OVB’s lending in moderate-income tracts exceeded proxy. OVB’s geographic distribution of motor vehicle lending is considered excellent.



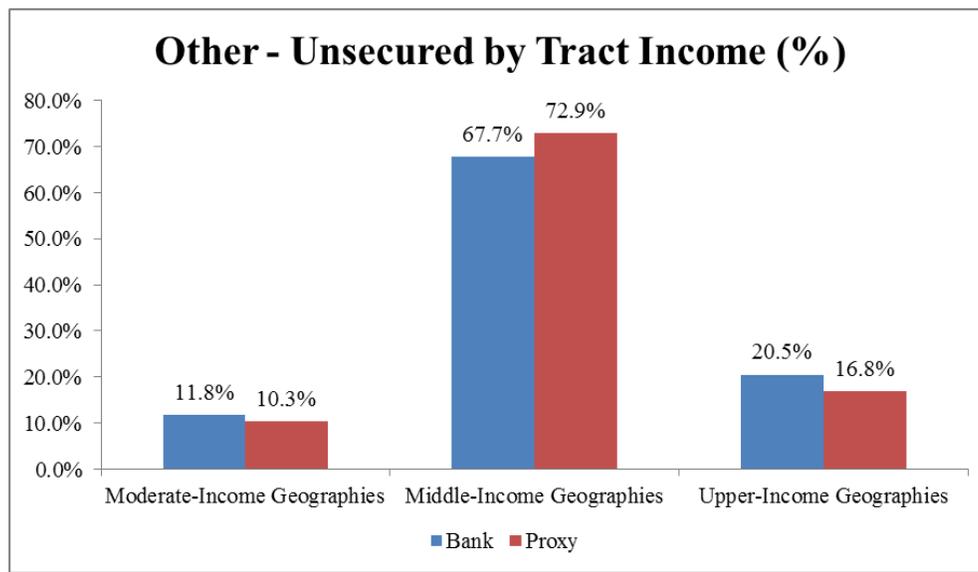
Other – Secured

OVB originated 52 other-secured loans within the assessment area during the review period. OVB’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). As shown in the graph below, OVB’s lending in moderate-income tracts significantly exceeded proxy. OVB’s geographic distribution of other-secured lending is considered excellent.



Other – Unsecured

OVB originated 161 other-unsecured loans within the assessment area during the review period. OVB’s performance was compared to the number of owner-occupied housing units in the assessment area (proxy). As shown in the graph below, OVB’s lending in moderate-income tracts is above proxy. OVB’s geographic distribution of other-unsecured lending is considered excellent.



Community Development Test

OVB’s community development performance demonstrated an excellent level of responsiveness to the needs of the assessment area through community development loans, investments and services, considering the bank’s capacity and the need and availability of community development opportunities in the assessment area.

Community Development Lending

OVB made one community development loan in this assessment area totaling \$105,000. The loan was to finance the purchase of a small business in a moderate-income tract, providing economic development to the area.

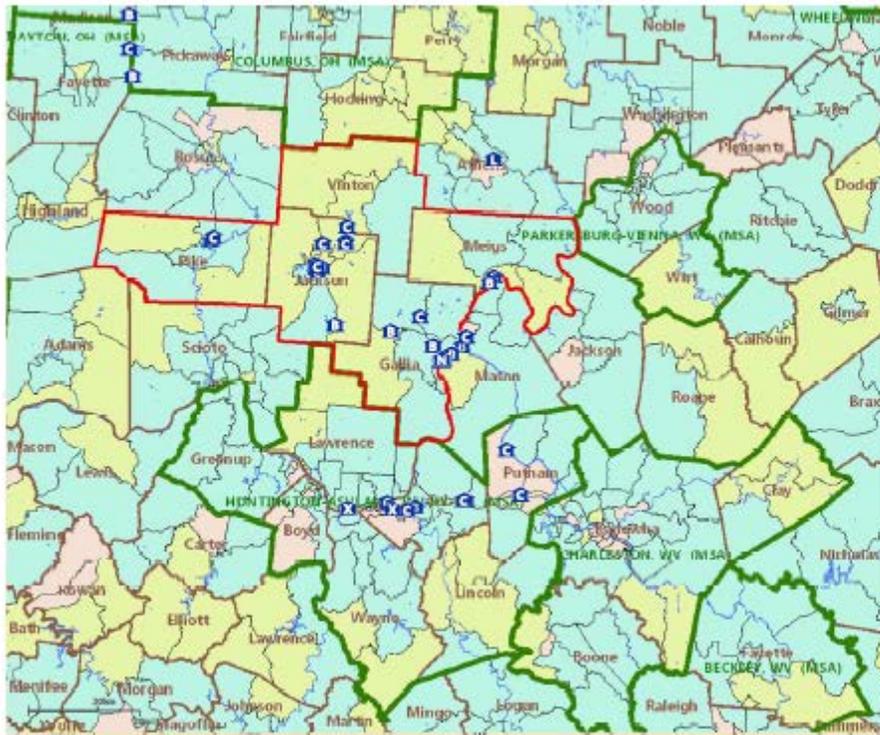
Qualified Investments

OVB made two grants totaling \$51,000 to provide flood relief assistance and supplies as a result of serious flooding in the area that resulted in a federal disaster declaration.

Community Development Services

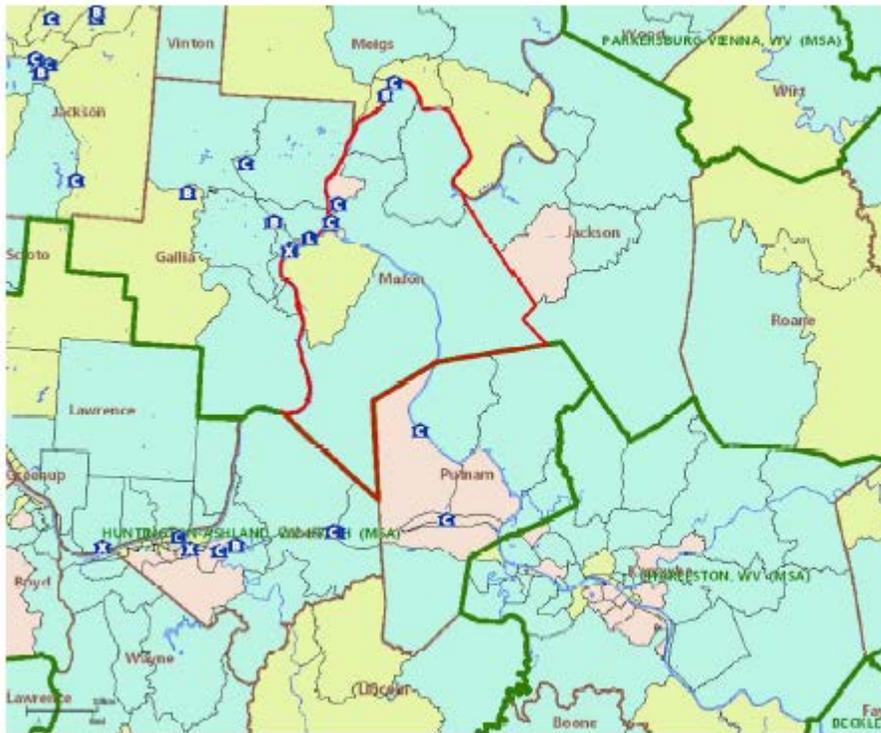
OVB's directors, officers, and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, and economic development. Examples of board and committee membership positions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

Assessment Area: OH Non MSA
 2016



LEGEND	
2010 Census Year	
INCOME	
[Light Green]	Low
[Yellow]	Moderate
[Light Blue]	Upper
[Light Purple]	Lower
[Light Orange]	Unknown
[Red Outline]	MSA Boundary
BANK BRANCHES	
[Blue Square]	Branches with ATM - 18
[Green Square]	Cash Only ATM - 25
[Red Square]	Closed - 4
[Purple Square]	Loan Prod. Office - 2
[Orange Square]	Main Office with ATM - 1
FEATURES	
[Blue Area]	Water body

Assessment Area: WV Non MSA
 2016



LEGEND
 2010 Census Year

INCOME

- Low
- Moderate
- Middle
- Upper
- Unknown

AA Boundary

LOANS: by Type
 Inside and Outside AA - 2016

- CV - 188
- MI - 88
- MF - 2
- MF - 1478
- CI - 381
- CI - 686
- SI - 61
- SI - 207

BANK BRANCHES
 Inside and Outside AA

- Branches with ATM - 18
- Cash Only ATM - 25
- Closed - 4
- Loan Prod. Office - 2
- Main Office with ATM - 1

FEATURES

- Water Body

APPENDIX B

LENDING TABLES

HMDA Loan Distribution Table

Exam: OVB Initial, 2017

Assessment Area/Group : Huntington Combined

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	2	5.6%	217	3.1%	0	0.0%	0	0.0%
Moderate	2	5.6%	202	2.9%	8	22.2%	552	7.9%
Low/Moderate Total	4	11.1%	419	6.0%	8	22.2%	552	7.9%
Middle	23	63.9%	4,861	69.6%	10	27.8%	1,286	18.4%
Upper	9	25.0%	1,701	24.4%	18	50.0%	5,143	73.7%
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	36	100.0%	6,981	100.0%	36	100.0%	6,981	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	7.1%	50	2.5%	2	14.3%	199	10.0%
Low/Moderate Total	1	7.1%	50	2.5%	2	14.3%	199	10.0%
Middle	10	71.4%	1,653	82.8%	2	14.3%	164	8.2%
Upper	3	21.4%	294	14.7%	10	71.4%	1,634	81.8%
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%	1,997	100.0%	14	100.0%	1,997	100.0%
Home Improvement								
Low	1	4.0%	5	0.7%	4	16.0%	23	3.3%
Moderate	0	0.0%	0	0.0%	5	20.0%	115	16.7%
Low/Moderate Total	1	4.0%	5	0.7%	9	36.0%	138	20.0%
Middle	19	76.0%	506	73.4%	7	28.0%	215	31.2%
Upper	5	20.0%	178	25.8%	9	36.0%	336	48.8%
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%	689	100.0%	25	100.0%	689	100.0%
Multi-Family								
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	1	100.0%	575	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	575	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	575	100.0%	1	100.0%	575	100.0%
HMDA Totals								
Low	3	3.9%	222	2.2%	4	5.3%	23	0.2%
Moderate	3	3.9%	252	2.5%	15	19.7%	866	8.5%
Low/Moderate Total	6	7.9%	474	4.6%	19	25.0%	889	8.7%
Middle	52	68.4%	7,020	68.5%	19	25.0%	1,665	16.3%
Upper	18	23.7%	2,748	26.8%	37	48.7%	7,113	69.4%
Unknown	0	0.0%	0	0.0%	1	1.3%	575	5.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	76	100.0%	10,242	100.0%	76	100.0%	10,242	100.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: OVB Initial, 2017

Assessment Area/Group : Huntington Combined

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Motor Vehicle							
Low	1	1.8%	5	0.6%	1	1.8%	7	0.8%
Moderate	6	10.9%	109	12.1%	0	0.0%	0	0.0%
Low/Moderate Total	7	12.7%	114	12.7%	1	1.8%	7	0.8%
Middle	41	74.5%	627	69.7%	0	0.0%	0	0.0%
Upper	7	12.7%	159	17.6%	1	1.8%	8	0.8%
Unknown	0	0.0%	0	0.0%	53	96.4%	885	98.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	55	100.0%	899	100.0%	55	100.0%	899	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	4.3%	2	0.7%	1	4.3%	17	5.4%
Low/Moderate Total	1	4.3%	2	0.7%	1	4.3%	17	5.4%
Middle	20	87.0%	307	95.7%	2	8.7%	32	10.0%
Upper	2	8.7%	12	3.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	20	87.0%	271	84.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	321	100.0%	23	100.0%	321	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	2.8%	6	1.8%	0	0.0%	0	0.0%
Low/Moderate Total	1	2.8%	6	1.8%	0	0.0%	0	0.0%
Middle	34	94.4%	346	95.7%	0	0.0%	0	0.0%
Upper	1	2.8%	9	2.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	36	100.0%	362	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	362	100.0%	36	100.0%	362	100.0%
	Consumer Loan Totals							
Low	1	0.9%	5	0.3%	1	0.9%	7	0.4%
Moderate	8	7.0%	117	7.4%	1	0.9%	17	1.1%
Low/Moderate Total	9	7.9%	122	7.7%	2	1.8%	24	1.5%
Middle	95	83.3%	1,280	80.9%	2	1.8%	32	2.0%
Upper	10	8.8%	179	11.3%	1	0.9%	8	0.5%
Unknown	0	0.0%	0	0.0%	109	95.6%	1,518	96.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	114	100.0%	1,582	100.0%	114	100.0%	1,582	100.0%

CRA Loan Distribution Table

Exam: OVB Initial, 2017

Assessment Area/Group: Huntington Combined

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	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%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	12	100.0%	1,350	100.0%	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%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	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%	0	0.0%	0	0.0%
Total	12	100.0%	1,350	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	4	33.3%	367	27.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	2	16.7%	549	40.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	6	50.0%	434	32.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	1,350	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	9	75.0%	388	28.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	16.7%	442	32.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	8.3%	520	38.5%	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%	0	0.0%	0	0.0%
Total	12	100.0%	1,350	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	3	75.0%	139	37.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	25.0%	228	62.1%	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%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	367	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: OVB Initial, 2017

Assessment Area/Group : OH Non MSA Combined

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	15	4.1%	667	1.5%
Moderate	86	23.6%	9,608	22.1%	63	17.3%	4,595	10.6%
Low/Moderate Total	86	23.6%	9,608	22.1%	78	21.4%	5,262	12.1%
Middle	278	76.4%	33,852	77.9%	97	26.6%	9,173	21.1%
Upper	0	0.0%	0	0.0%	172	47.3%	27,043	62.2%
Unknown	0	0.0%	0	0.0%	17	4.7%	1,982	4.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	364	100.0%	43,460	100.0%	364	100.0%	43,460	100.0%
Refinance								
Low	0	0.0%	0	0.0%	10	8.4%	501	3.7%
Moderate	34	28.6%	3,654	27.1%	15	12.6%	773	5.7%
Low/Moderate Total	34	28.6%	3,654	27.1%	25	21.0%	1,274	9.4%
Middle	85	71.4%	9,843	72.9%	34	28.6%	3,552	26.3%
Upper	0	0.0%	0	0.0%	55	46.2%	7,713	57.1%
Unknown	0	0.0%	0	0.0%	5	4.2%	958	7.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	119	100.0%	13,497	100.0%	119	100.0%	13,497	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	18	11.7%	286	3.8%
Moderate	55	35.7%	2,993	39.9%	31	20.1%	665	8.9%
Low/Moderate Total	55	35.7%	2,993	39.9%	49	31.8%	951	12.7%
Middle	99	64.3%	4,509	60.1%	32	20.8%	1,369	18.2%
Upper	0	0.0%	0	0.0%	63	40.9%	4,418	58.9%
Unknown	0	0.0%	0	0.0%	10	6.5%	764	10.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	154	100.0%	7,502	100.0%	154	100.0%	7,502	100.0%
Multi-Family								
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	2	100.0%	854	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%	2	100.0%	854	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	854	100.0%	2	100.0%	854	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	43	6.7%	1,454	2.2%
Moderate	175	27.4%	16,255	24.9%	109	17.1%	6,033	9.2%
Low/Moderate Total	175	27.4%	16,255	24.9%	152	23.8%	7,487	11.5%
Middle	464	72.6%	49,058	75.1%	163	25.5%	14,094	21.6%
Upper	0	0.0%	0	0.0%	290	45.4%	39,174	60.0%
Unknown	0	0.0%	0	0.0%	34	5.3%	4,558	7.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	639	100.0%	65,313	100.0%	639	100.0%	65,313	100.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: OVB Initial, 2017

Assessment Area/Group : OH Non MSA Combined

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	10	0.9%	110	0.6%
Moderate	419	36.2%	6,132	31.1%	13	1.1%	208	1.1%
Low/Moderate Total	419	36.2%	6,132	31.1%	23	2.0%	318	1.6%
Middle	740	63.8%	13,609	68.9%	17	1.5%	277	1.4%
Upper	0	0.0%	0	0.0%	29	2.5%	539	2.7%
Unknown	0	0.0%	0	0.0%	1,090	94.0%	18,606	94.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,159	100.0%	19,740	100.0%	1,159	100.0%	19,740	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	7	1.1%	50	0.6%
Moderate	329	53.3%	4,049	49.7%	8	1.3%	71	0.9%
Low/Moderate Total	329	53.3%	4,049	49.7%	15	2.4%	121	1.5%
Middle	288	46.7%	4,097	50.3%	9	1.5%	121	1.5%
Upper	0	0.0%	0	0.0%	14	2.3%	208	2.5%
Unknown	0	0.0%	0	0.0%	579	93.8%	7,697	94.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	617	100.0%	8,146	100.0%	617	100.0%	8,146	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	8	1.3%	110	2.2%
Moderate	298	47.7%	1,893	37.2%	7	1.1%	26	0.5%
Low/Moderate Total	298	47.7%	1,893	37.2%	15	2.4%	136	2.7%
Middle	327	52.3%	3,197	62.8%	12	1.9%	75	1.5%
Upper	0	0.0%	0	0.0%	16	2.6%	185	3.6%
Unknown	0	0.0%	0	0.0%	582	93.1%	4,695	92.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	625	100.0%	5,091	100.0%	625	100.0%	5,091	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	25	1.0%	269	0.8%
Moderate	1,046	43.6%	12,074	36.6%	28	1.2%	305	0.9%
Low/Moderate Total	1,046	43.6%	12,074	36.6%	53	2.2%	574	1.7%
Middle	1,355	56.4%	20,903	63.4%	38	1.6%	473	1.4%
Upper	0	0.0%	0	0.0%	59	2.5%	931	2.8%
Unknown	0	0.0%	0	0.0%	2,251	93.8%	30,999	94.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,401	100.0%	32,977	100.0%	2,401	100.0%	32,977	100.0%

CRA Loan Distribution Table

Exam: OVB Initial, 2017

Assessment Area/Group: OH Non MSA Combined

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	85	45.2%	6,984	40.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	85	45.2%	6,984	40.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	103	54.8%	10,419	59.9%	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%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	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%	0	0.0%	0	0.0%
Total	188	100.0%	17,403	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	67	35.6%	4,680	26.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	18	9.6%	4,923	28.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	103	54.8%	7,800	44.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	188	100.0%	17,403	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	154	81.9%	5,047	29.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	20	10.6%	2,866	16.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	12	6.4%	5,890	33.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	2	1.1%	3,600	20.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	188	100.0%	17,403	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	58	86.6%	1,707	36.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	7	10.4%	1,042	22.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	1.5%	581	12.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	1.5%	1,350	28.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	67	100.0%	4,680	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

HMDA Loan Distribution Table

Exam: OVB Initial, 2017

Assessment Area/Group : WV Non MSA Combined Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	5	6.0%	293	3.2%
Moderate	5	6.0%	565	6.2%	9	10.8%	656	7.2%
Low/Moderate Total	5	6.0%	565	6.2%	14	16.9%	949	10.5%
Middle	49	59.0%	5,614	61.8%	17	20.5%	1,399	15.4%
Upper	29	34.9%	2,902	32.0%	49	59.0%	6,383	70.3%
Unknown	0	0.0%	0	0.0%	3	3.6%	350	3.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	83	100.0%	9,081	100.0%	83	100.0%	9,081	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	2	5.6%	82	1.8%
Moderate	7	19.4%	728	16.0%	4	11.1%	188	4.1%
Low/Moderate Total	7	19.4%	728	16.0%	6	16.7%	270	5.9%
Middle	22	61.1%	3,186	70.0%	5	13.9%	403	8.9%
Upper	7	19.4%	639	14.0%	21	58.3%	3,125	68.6%
Unknown	0	0.0%	0	0.0%	4	11.1%	755	16.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	4,553	100.0%	36	100.0%	4,553	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	7.1%	10	1.9%	3	21.4%	18	3.4%
Low/Moderate Total	1	7.1%	10	1.9%	3	21.4%	18	3.4%
Middle	11	78.6%	442	83.6%	2	14.3%	69	13.0%
Upper	2	14.3%	77	14.6%	7	50.0%	188	35.5%
Unknown	0	0.0%	0	0.0%	2	14.3%	254	48.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	529	100.0%	14	100.0%	529	100.0%
	Multi-Family							
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%
	HMDA Totals							
Low	0	0.0%	0	0.0%	7	5.3%	375	2.6%
Moderate	13	9.8%	1,303	9.2%	16	12.0%	862	6.1%
Low/Moderate Total	13	9.8%	1,303	9.2%	23	17.3%	1,237	8.7%
Middle	82	61.7%	9,242	65.3%	24	18.0%	1,871	13.2%
Upper	38	28.6%	3,618	25.5%	77	57.9%	9,696	68.5%
Unknown	0	0.0%	0	0.0%	9	6.8%	1,359	9.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	133	100.0%	14,163	100.0%	133	100.0%	14,163	100.0%

*Information based on 2010 ACS data

Consumer Loan Distribution Table

Exam: OVB Initial, 2017

Assessment Area/Group : WV Non MSA Combined

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	2	0.8%	30	0.7%
Moderate	28	11.4%	521	12.5%	2	0.8%	48	1.1%
Low/Moderate Total	28	11.4%	521	12.5%	4	1.6%	78	1.9%
Middle	170	69.1%	2,835	67.8%	4	1.6%	56	1.3%
Upper	48	19.5%	822	19.7%	4	1.6%	75	1.8%
Unknown	0	0.0%	0	0.0%	234	95.1%	3,969	95.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	246	100.0%	4,178	100.0%	246	100.0%	4,178	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	1.9%	4	0.4%
Moderate	14	26.9%	202	23.1%	1	1.9%	28	3.2%
Low/Moderate Total	14	26.9%	202	23.1%	2	3.8%	32	3.6%
Middle	30	57.7%	509	58.3%	1	1.9%	24	2.7%
Upper	8	15.4%	163	18.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	49	94.2%	818	93.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	874	100.0%	52	100.0%	874	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	1	0.6%	2	0.1%
Moderate	19	11.8%	301	11.9%	4	2.5%	19	0.7%
Low/Moderate Total	19	11.8%	301	11.9%	5	3.1%	21	0.8%
Middle	109	67.7%	1,394	54.9%	3	1.9%	19	0.7%
Upper	33	20.5%	844	33.3%	4	2.5%	31	1.2%
Unknown	0	0.0%	0	0.0%	149	92.5%	2,469	97.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	161	100.0%	2,539	100.0%	161	100.0%	2,539	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	4	0.9%	36	0.5%
Moderate	61	13.3%	1,024	13.5%	7	1.5%	94	1.2%
Low/Moderate Total	61	13.3%	1,024	13.5%	11	2.4%	130	1.7%
Middle	309	67.3%	4,737	62.4%	8	1.7%	98	1.3%
Upper	89	19.4%	1,830	24.1%	8	1.7%	106	1.4%
Unknown	0	0.0%	0	0.0%	432	94.1%	7,256	95.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	459	100.0%	7,591	100.0%	459	100.0%	7,591	100.0%

CRA Loan Distribution Table

Exam: OVB Initial, 2017

Assessment Area/Group: WV Non MSA Combined

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	18.2%	265	6.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	4	18.2%	265	6.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	11	50.0%	667	15.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	7	31.8%	3,255	77.8%	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%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	4,187	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	10	45.5%	681	16.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	3	13.6%	2,395	57.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	9	40.9%	1,111	26.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	4,187	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	13	59.1%	536	12.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	7	31.8%	900	21.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	4.5%	500	11.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	4.5%	2,250	53.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	4,187	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	7	70.0%	257	37.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	30.0%	424	62.3%	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%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	681	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

*Information based on 2010 ACS data

APPENDIX C

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.