

# **PUBLIC DISCLOSURE**

February 27, 2017

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Peoples Bank  
RSSD# 577128

138 Putnam Street  
Marietta, Ohio 41501

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

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION’S CRA RATING

### *INSTITUTION'S CRA RATING: “Satisfactory”*

*The following table indicates the performance level of Peoples Bank with respect to the lending, investment, and service tests.*

PERFORMANCE LEVELS	PEOPLES BANK PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A high percentage of loans made in the institution’s assessment area;
- A good geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and a good distribution to businesses of different revenue sizes;
- An adequate record of serving the credit needs of low-income individuals and areas and very small businesses.
- A relatively high level of making community development loans;
- Makes use of innovative and/or flexible lending practices in serving assessment area credit needs.
- An excellent level of qualified community development investments and grants, often in a leadership position;
- Retail delivery systems that are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- An adequate level of community development services.

### **Previous Performance Evaluation**

Peoples Bank received a “Satisfactory” rating as a result of a performance evaluation completed by the OCC dated January 7, 2015. The lending test was rated “High Satisfactory,” the investment test was rated “Low Satisfactory,” and the service test was rated “Outstanding.”

## DESCRIPTION OF INSTITUTION

### **Overview**

Peoples Bank (Peoples) is a subsidiary of Peoples Bancorp, a bank holding company headquartered in Marietta, Ohio. As of December 31, 2016, Peoples reported total assets of \$3.4 billion. Peoples Bancorp also reported total assets of \$3.4 billion. As of February 27, 2017, Peoples had approximately 72 branches across its footprint in three states, including Kentucky, Ohio, and West Virginia. During the evaluation period, Peoples entered the Cincinnati, Ohio and Dayton, Ohio markets through an acquisition with National Bank and Trust in first quarter 2015.

### **Non-Bank Subsidiaries**

Peoples has a non-bank subsidiary, Peoples Insurance Agency, LLC, located in Marietta, Ohio that offers insurance products. Community development investments made by Peoples Capital Corporation, a subsidiary of the holding company, were considered at the request of the bank. In addition, CRA-qualified grants provided by Peoples Bancorp Foundation, Inc. were also considered. The foundation serves as a non-profit for charitable purposes with a focus on community investment and economic development, youth and education, human services programs that improve the social needs of low-to-moderate-income communities and individuals, and arts and culture. These subsidiaries increase Peoples' capacity to reinvest in the community through qualified investments.

### **Business Lines**

Peoples offers personal banking, commercial, insurance, investment, and trust solutions. Products and services include various demand deposit, savings, and money market accounts; certificates of deposit; commercial and real estate mortgage loans, both commercial and residential, and lines of credit; debit and automated teller machine (ATM) cards; credit cards (personal and corporate); merchant credit card transaction processing services; corporate and personal trust services; safe deposit boxes; money orders and cashier checks; life, health, and property and casualty insurance products; brokerage services; employee benefit plans; and asset management services. Loans represented approximately 65.6% of Peoples' average assets as of December 31, 2016.

### **Assessment Areas**

The following summarizes Peoples assessment areas for this CRA performance evaluation:

#### ***Multi-State***

- *Huntington-Ashland WV-KY-OH MSA #26580 (Huntington-Ashland MSA)*
  - Consists of the entireties of Boyd and Greenup counties in Kentucky and Cabell County in West Virginia

### **Ohio**

- *Akron OH MSA #10420 (Akron MSA)*
  - Consists of the entirety of Summit County.
- *Cincinnati OH-KY-IN MSA #17140 (Cincinnati MSA)*
  - Consists of the entireties of Brown, Clermont, and Warren counties.
- *Cleveland-Elyria OH MSA#17460 (Cleveland MSA)*
  - Consists of the entirety of Cuyahoga County and portions of Geauga and Lake counties
- *Columbus OH MSA#18140 (Columbus MSA)*
  - Consists of the entirety of Fairfield, Hocking, Licking, and Perry counties
- *Dayton OH MSA#19380 (Dayton MSA)*
  - Consists of the entirety of Montgomery County
- *Non-metropolitan Central Ohio*
  - Consists of the entireties of Athens, Coshocton, Gallia, Guernsey, Jackson, Knox, Meigs, Morgan, Muskingham, Noble, Tuscarawas, Vinton, and Washington Counties
- *Non-metropolitan Southeastern Ohio*
  - Consists of the entireties of Clinton and Highland counties

### **West Virginia**

- *Non-metropolitan North West Virginia*
  - Consists of the entirety of Tyler and Wetzel counties
- *Non-metropolitan Western West Virginia*
  - Consists of the entirety of Mason County
- *Parkersburg-Vienna WV MSA #37620 (Parkersburg-Vienna MSA)*
  - Consists of the entirety of Wood County

A detailed description of each assessment area is presented in subsequent sections of this performance evaluation and assessment area maps can be found in Appendix C.

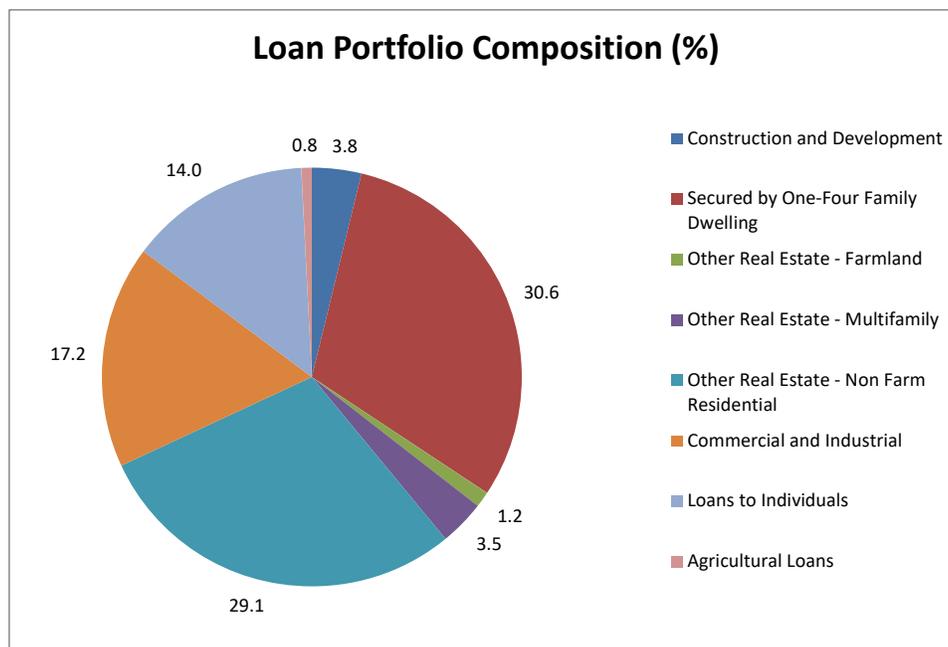
### **Financial Overview**

Peoples offers a wide variety of consumer, residential real estate, commercial, and agricultural loan products to fulfill the credit needs of the residents and businesses in its assessment areas. Consumer loan products include direct and indirect auto loans, personal lines of credit, installment loans, home equity loans, mortgage loans, and credit cards. Peoples also offers construction lending and commercial loan products, including loans and lines of credit, business credit cards, and Small Business Administration (SBA) loans.

The following charts display Peoples' loan portfolio composition as of September 30, 2016.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	9/30/2016		12/31/2015		12/31/2014	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	81,080	3.8%	75,899	3.7%	38,952	2.4%
Secured by One- to Four- Family Dwellings	661,072	30.6%	673,937	32.7%	564,512	35.0%
Other Real Estate: Farmland	25,127	1.2%	22,593	1.1%	979	0.1%
Other Real Estate: Multifamily	75,268	3.5%	70,457	3.4%	71,624	4.4%
Other Real Estate: Nonfarm nonresidential	628,483	29.1%	643,226	31.2%	483,532	30.0%
Commercial and Industrial	371,811	17.2%	323,288	15.7%	268,457	16.7%
Loans to Individuals	301,777	14.0%	235,114	11.4%	182,709	11.3%
Agricultural Loans	16,732	0.8%	17,794	0.9%	0	0.0%
<b>Total</b>	<b>\$2,161,350</b>	<b>100.00%</b>	<b>\$2,062,308</b>	<b>100.00%</b>	<b>\$1,610,765</b>	<b>100.00%</b>

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



Peoples' loan portfolio includes products that provide flexible repayment terms to help meet the credit needs of low- and moderate-income borrowers and small businesses. Peoples also works with many state and local agencies that offer first-time homebuyer mortgages and/or down payment assistance for low- and moderate-income borrowers.

For small businesses, Peoples is an approved preferred lender under the Small Business Associations (SBA) Preferred Lending Program (PLP). This allows small businesses in the bank's footprint to receive quicker turnaround on applications submitted for SBA loan assistance. The designation as a PLP gives Peoples special authorization to internally underwrite and approve SBA business loans. Peoples is an active SBA lender offering the 7(a) program, the SBA's most common loan program. This program offers funds to small businesses with flexible repayment terms for multiple purposes.

Peoples' investment portfolio as of December 31, 2016, was \$823 million, which represented 24.1% of total assets. Investments in U.S. Treasuries and Agency Securities accounted for 76.7% of investments, while Municipal Securities accounted for 14.5%. The remaining percentage of investments consisted of interest-bearing bank balances and other investments.

There are no known legal impediments that would restrain Peoples from meeting the credit needs of its assessment areas.

## SCOPE OF EXAMINATION

For the purpose of this evaluation, Peoples had a total of 11 CRA assessment areas across three states. Peoples is an interstate bank; therefore, the scope of this evaluation includes a full-scope review of at least one assessment area in each state in which Peoples has branches. Each assessment area was reviewed for lending, investment, and service performance utilizing either full- or limited-scope examination procedures. Five assessment areas were chosen for full-scope review, including one multistate MSA. Criteria used to select full-scope assessment areas include the volume of HMDA-reportable and CRA small business lending by number of loans and dollar amount as a percentage of statewide lending activity, deposit market share, number of branches, percentage of deposits, amount of community development activity, and other non-financial considerations. Full-scope assessment areas represent the most active markets in each state based on these criteria.

The following assessment areas received full-scope reviews:

- **Multi-State:** Huntington-Ashland MSA
- **Ohio:** Cincinnati and Columbus MSAs and Non-metropolitan Central Ohio
- **West Virginia:** Parkersburg-Vienna MSA

Limited-scope reviews were completed for the remaining assessment areas.

Ohio's assessment areas had the highest number of branches and largest concentration of lending and deposit activity and represented more than three-quarters of Peoples' banking centers, ATMs, lending activity, and market share of deposits in this evaluation period. As a result, performance in these areas received the greatest weight in determining the overall rating for each test and the institution overall.

### **Examination Evaluation Period and Products Reviewed**

This evaluation included an analysis of HMDA-reportable loans and CRA-reportable small business loans originated between January 1, 2014 and July 31, 2016. HMDA-reportable home purchase, home refinance, and home improvement loans and CRA-reportable small business loans were the major lending products reviewed in this evaluation. HMDA-reportable multi-family loans and CRA-reportable small farm loans were not considered in the overall evaluation due to low activity levels.

Community development loans and investments funded between January 7, 2015 and February 23, 2017 were reviewed as part of the lending and investment tests, respectively. Investments funded by Peoples Capital Corporation, the Foundation, and regional banking centers were included in the analysis. Also, investments with community development as a primary purpose that were funded during a prior evaluation period, but still outstanding as of February 23, 2017, were also considered. Finally, community development services that occurred during the evaluation period were included in the service test evaluation. Refer to Appendix A for a summary of the scope of the examination.

### *Examination Analysis*

The evaluation of Peoples' lending record in individual assessment areas includes the utilization of and comparison to demographic characteristics. The primary sources for this data are the 2010 U.S. Census and 2015 Dun & Bradstreet data. Demographic characteristics of a particular assessment area are useful in analyzing a financial institution's lending record, since they provide a means of estimating loan demand and identifying lending opportunities. To understand small business demand, self-reported data on revenue size and geographic location from business entities is collected and published by Dun & Bradstreet. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The data, along with information about housing and economic conditions, is used to establish performance context and evaluate Peoples accordingly.

Loans are evaluated to determine the lending activity inside and outside Peoples' assessment areas. In addition, loans inside the assessment area are evaluated based on the geographic and borrower income distribution for each assessment area. The geographic distribution of HMDA loans is assessed by comparing the percentage of loans made in each geography type (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geography type. Small business loans are compared to the percentage of small businesses within each geographic income category.

The distribution of HMDA loans by borrower income is assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) to the percentage of families in each income category. The distribution of small business loans by borrower income is assessed by comparing the percentage of loans made to businesses in each revenue category (less than or equal to \$1 million and greater than \$1 million) to the percentage of total businesses in each revenue category.

Peoples' lending performance was also compared to the performance of aggregate lenders in 2014 and 2015; due to the timing of this evaluation, only 2014 and 2015 aggregate lending data was available. Aggregate lenders include all lenders required to report HMDA-reportable and CRA small business lending data within the respective assessment areas. Lending market share is also discussed to give a better understanding of how Peoples ranks within the respective areas. For retail services, Peoples' branch distribution analysis was conducted using data as of February 27, 2017.

Community development activities were reviewed to determine whether they have community development as a primary purpose and meet the geographic requirements of CRA. The eligibility of a loan, investment, or service is based on demographic information available to Peoples at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to better understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, aggregate comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

Lastly, community contact interviews were utilized with representatives from affordable housing, economic development, and governmental organizations operating inside Peoples' CRA-delineated footprint. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish a context for the communities in which Peoples operates and gather information on its performance. Details from these interviews are presented in subsequent sections of this evaluation.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### **Lending Test**

Peoples' lending test performance is rated "High Satisfactory." Lending performance is excellent in the Huntington-Ashland MSA and good in Ohio and West Virginia. The geographic distribution of loans throughout the assessment areas is good. The penetration of loans among borrowers of different income levels is good and the distribution of loans to businesses of different sizes is also good. Additionally, Peoples makes a relatively high level of community development loans. Community development lending was good in the Huntington-Ashland MSA and Ohio and poor in West Virginia. As discussed earlier, Peoples' performance in Ohio had the greatest impact on its overall lending performance.

While Peoples' lending distribution by geography and borrower income is referenced throughout this report, detailed information about HMDA-reportable and CRA small business loans can be found in Appendix D for full- and limited-scope assessment areas, respectively. In some product discussions, specific numbers are quoted from these tables to support relevant points; otherwise, general references are made about performance and the reader should refer to the appendices for specific data.

### ***Lending Activity***

Peoples demonstrated a good responsiveness to the credit needs of its assessment area, taking into consideration the bank's strategic objectives, economic conditions and competitive factors. Some communities in Peoples' assessment area continue to be impacted by challenging economic times, but are experiencing some recovery.

The following table summarizes Peoples' lending activity. As the data shows, Peoples originated more HMDA-related loans than small business loans by both number and dollar amount. Due to the higher percentage of loans by number and dollar amount, HMDA-related lending typically had a greater impact on lending ratings. Lending was considered responsive to credit needs in all states and generally commensurate with deposits in each state. Full-scope areas did not have any conspicuous gaps in lending activity by income category; however, gaps in lending were identified in some limited-scope assessment areas, which can be attributed to Peoples' new presence within these areas. Detailed information about lending activity can be found in the multi-state and state sections of this report.

Summary of Lending Activity				
Loan Type	#	%	\$(000)	%
Home Purchase	1,225		137,641	
Home Improvement	304		24,059	
Refinancing	867		99,557	
Multi-Family	15		6,508	
<b>Total HMDA related</b>	<b>2,411</b>	<b>64.2</b>	<b>267,765</b>	<b>58.6</b>
Small Business	1,253		181,392	
<b>Total Small Business related</b>	<b>1,253</b>	<b>33.4</b>	<b>181,392</b>	<b>39.7</b>
Small Farm	92		7,399	
<b>Total Small Farm related</b>	<b>92</b>	<b>2.4</b>	<b>7,399</b>	<b>1.6</b>
<b>TOTAL LOANS</b>	<b>3,756</b>	<b>100</b>	<b>456,556</b>	<b>100</b>

### Assessment Area Concentration

The following table shows the number and percentage of loans located inside and outside of Peoples' assessment areas by loan type. As indicated below, Peoples originated a majority of its loans to borrowers and businesses located within its assessment areas.

#### Lending Inside and Outside the Assessment Area

Exam: Peoples Bank Marietta, Initial

Loan Type - Description	Inside				Outside				Total			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
AC - Other Loan Data	1	100.0	200	100.0	0	0.0	0	0.0	1	100.0	200	100.0
<b>Total Consumer related</b>	<b>1</b>	<b>100.0</b>	<b>200</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>1</b>	<b>100.0</b>	<b>200</b>	<b>100.0</b>
CV - Home Purchase - Conventional	1,102	88.1	125,664	86.3	149	11.9	19,916	13.7	1,251	100.0	145,580	100.0
FH - Home Purchase - FHA	123	97.6	11,977	98.2	3	2.4	216	1.8	126	100.0	12,193	100.0
HI - Home Improvement	304	89.7	24,059	87.5	35	10.3	3,426	12.5	339	100.0	27,485	100.0
MF - Multi-Family Housing	15	71.4	6,508	29.6	6	28.6	15,491	70.4	21	100.0	21,999	100.0
RF - Refinancing	867	91.1	99,557	87.3	85	8.9	14,426	12.7	952	100.0	113,983	100.0
<b>Total HMDA related</b>	<b>2,411</b>	<b>89.7</b>	<b>267,765</b>	<b>83.4</b>	<b>278</b>	<b>10.3</b>	<b>53,475</b>	<b>16.6</b>	<b>2,689</b>	<b>100.0</b>	<b>321,240</b>	<b>100.0</b>
SB - Small Business	1,253	82.7	181,392	71.2	263	17.3	73,542	28.8	1,516	100.0	254,934	100.0
<b>Total Small Bus. related</b>	<b>1,253</b>	<b>82.7</b>	<b>181,392</b>	<b>71.2</b>	<b>263</b>	<b>17.3</b>	<b>73,542</b>	<b>28.8</b>	<b>1,516</b>	<b>100.0</b>	<b>254,934</b>	<b>100.0</b>
SF - Small Farm	92	78.0	7,399	67.3	26	22.0	3,601	32.7	118	100.0	11,000	100.0
<b>Total Small Farm related</b>	<b>92</b>	<b>78.0</b>	<b>7,399</b>	<b>67.3</b>	<b>26</b>	<b>22.0</b>	<b>3,601</b>	<b>32.7</b>	<b>118</b>	<b>100.0</b>	<b>11,000</b>	<b>100.0</b>
<b>TOTAL LOANS</b>	<b>3,757</b>	<b>86.9</b>	<b>456,756</b>	<b>77.8</b>	<b>567</b>	<b>13.1</b>	<b>130,618</b>	<b>22.2</b>	<b>4,324</b>	<b>100.0</b>	<b>587,374</b>	<b>100.0</b>

Peoples originated 89.7% of HMDA-related loans by volume and 83.4% by dollar amount and 82.7% of small business loans by volume and 71.2% by dollar amount to businesses located inside its assessment areas. This indicates Peoples' willingness to originate loans that meet the credit needs of its delineated assessment areas.

### Distribution of Lending by Geography, Borrower Income and Business Revenue Size

Borrower distribution received slightly more weight based on the overall percentage of low- and moderate-income population at 39.3% compared to the percentage of low- and moderate-income geographies at 36.7%.

The overall geographic distribution of HMDA and small business lending reflects a good penetration in low- and moderate-income geographies. Of the one multi-state and four full-scope assessment areas, three are considered excellent and two are considered good.

The overall distribution of loans among borrowers of different income levels and to businesses of different revenue sizes is good. HMDA-reportable lending to borrowers of different income levels is good. Of the one multi-state and four full-scope assessment areas, three were considered excellent and two were good. Small business lending to businesses of different revenue sizes is good. Of the one multi-state and four full-scope assessment areas, all are considered good.

HMDA-reportable and small business lending analyses within each assessment area are discussed in detail later in this report.

### ***Community Development Lending***

During this review period, Peoples originated 48 community development loans totaling \$66.0 million, which is considered overall to be a relatively high level of community development loans. Of these, 38 loans were originated in Ohio, resulting in a relatively high level of community development lending activity in Ohio. There were seven loans originated in the Huntington-Ashland MSA, which resulted in a relatively high level of community development lending activity for this area. Finally, there were three loans originated in West Virginia, resulting in a low level of community development lending for this area. The majority of the loans supported community services targeted to low- and moderate-income individuals and families, followed by economic development and revitalization efforts in low- and moderate-income areas and affordable housing.

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

### ***Flexible Lending Programs***

In addition to traditional bank products, Peoples offers and participates in flexible lending programs such as the Small Business Administration (SBA) loans to small businesses, which are more complex to originate; USDA Rural Housing loans; Section 502 loans primarily used to help low-income borrowers purchase homes in rural areas; Welcome Home Grants that provide grant money (\$5,000 per household) to low- or moderate-income applicants for down payment and closing cost assistance; and the Hardest Hit Fund Program (in Ohio, the program is 'Save the Dream Ohio;' in Kentucky, it is 'Protect my Kentucky Home'), which provides mortgage assistance to unemployed borrowers. In addition, Peoples developed an internal low-income product, 'Dreams 2 Keys,' which provides viable lending options specific to low-income borrowers. These types of programs allow Peoples to address the credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented its performance within the assessment area. The following table provides a breakout of the various flexible loan programs offered during the review period.

<b>Flexible Lending Program</b>	<b>Total Number of Loans</b>	<b>Total Balance</b>
SBA	28	\$10,729,600
USDA Rural Housing	86	\$7,985,125
Welcome Home Grants	49	\$3,722,385
Save the Dream Ohio	8	\$601,932
Protect my Kentucky Home	2	\$208,807
Dreams 2 Keys	126	\$8,909,638
<b>Total</b>	<b>299</b>	<b>\$32,157,487</b>

Flexible lending generated outside of Peoples’ footprint included three SBA loans totaling \$3.9 million; five USDA Rural Housing Loans totaling \$608,000; six Welcome Home Grants totaling \$492,000; and 11 Dreams2Keys loans totaling \$870,000. More information on individual flexible lending programs can be found in the full-scope assessment area sections of this report.

**Investment Test**

Overall, Peoples’ performance under the investment test is rated “Outstanding.” Peoples made an excellent level of qualified community development investments during the evaluation period. Performance was excellent in the Huntington-Ashland MSA and in Ohio and West Virginia. The highest volume of qualified community development investments were in Ohio, followed by West Virginia and the Huntington-Ashland MSA.

Qualified investments obtained during the current evaluation period totaled approximately \$7.0 million, with the majority supporting affordable housing through state housing fund bonds and mortgage-backed securities (GNMA/FNMA). Prior period qualified investments totaled \$6.9 million and also supported affordable housing through state housing fund bonds, mortgage-backed securities, and Low Income Housing Tax Credits (LIHTCs).

Qualified investments also took the form of contributions, grants, and donations (approximately 3.1% of total investments). Peoples partnered with a wide array of organizations and non-profits to fund outreach activities, educational programs, and initiatives aimed at responding to community needs; improving the financial stability of individuals and families; and revitalizing underserved communities. These contributions help to support a multitude of priority needs, such as youth education, homelessness, affordable housing, small business development, financial services and education, and community services targeting low- and moderate-income individuals and communities. Refer to the respective assessment area analysis for further details.

**Service Test**

Overall, Peoples’ performance under the service test is rated “High Satisfactory.” In Ohio, which received the greatest weight, service performance is considered “High Satisfactory.” Peoples’ service performance in the Huntington-Ashland MSA and West Virginia is also considered “High Satisfactory.”

### ***Retail Services***

Retail delivery systems are accessible to geographies and individuals of different income levels. Retail services are excellent in the Huntington-Ashland MSA and good in Ohio and West Virginia.

Peoples has a total of 72 branches and 76 automated teller machines (ATMs). During the evaluation period, Peoples opened 22 new branches and closed four branches in moderate-income tracts, including opening four branches and closing two branches. Peoples' record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or low- and moderate-income individuals. Please refer to Appendix E for the geographic distribution of Peoples' branches and ATMs as of February 27, 2017.

Banking services do not vary in a way that inconveniences any portions of Peoples' assessment areas. Banking centers are generally open six days a week, with full days Monday through Friday and half days on Saturday. Peoples has three loan production offices (LPOs), two are within its delineated footprint in the Columbus MSA and Non-metropolitan Central Ohio and the third LPO is located in Charleston, West Virginia. Peoples also provides services through internet banking, mobile banking, and telephone banking.

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

Overall, Peoples provides an adequate level of community development services. Peoples provides an adequate level of providing community development services in Ohio and West Virginia and a limited level of services in the Huntington-Ashland MSA.

Peoples' directors, officers, and staff member provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, economic development, and revitalization of low- and moderate-income areas.

Community development services included, but were not limited, to the following:

#### ***Board and Committee Memberships***

Peoples' employees provided financial expertise through their involvement with community development organizations throughout the bank's delineated footprint. Examples of board and committee membership positions held include directors, treasurers, and committee members.

### *Financial Education*

Peoples continued its involvement in providing financial education programs through partnerships with schools, local organizations, government agencies, and businesses. Examples of topics taught were financial literacy in general, opening of deposit accounts, the loan application process, and affordable housing options.

### *Technical Assistance*

Peoples' employees provided technical assistance to community development and non-profit organizations. Technical assistance included reviewing loan application requests and tax services.

### **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 and deceptive practices was identified in the concurrent Consumer Compliance examination. The violation did not cause the CRA rating to be adjusted. The violation was self-identified and bank management was proactive in taking corrective action to address the violation.

**MULTI-STATE METROPOLITAN AREA**  
*(Full-scope Review)*

**CRA RATING for Huntington-Ashland, WV-KY-OH MSA #26580: Outstanding**

**The lending test is rated: Outstanding**

**The investment test is rated: Outstanding**

**The service test is rated: High Satisfactory**

The major factors and criteria contributing to this rating include:

- A good responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and a good distribution to businesses of different revenue sizes;
- An excellent record of serving the credit needs of low-income individuals and areas and very small businesses;
- Makes a relatively high level of community development loans;
- Extensive use of flexible lending practices in serving the assessment area's credit needs
- An excellent level of qualified community development investments and grants, often in a leadership position;
- Retail delivery systems that are readily accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A limited level of community development services.

**SCOPE OF EXAMINATION**

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

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

The Huntington-Ashland MSA consists of the entireties of Boyd and Greenup counties in Kentucky, Lawrence County in Ohio, and Cabell and Wayne counties in West Virginia; however, Peoples' assessment area only encompasses the entirety of Cabell County, West Virginia and both Boyd and Greenup counties in Kentucky. This assessment area consists of a total of 51 census tracts comprised of five low-income census tracts (9.8%), 12 moderate-income census tracts (23.5%), 23 middle-income census tracts (45.1%), and 11 upper-income census tracts (21.6%). Peoples has six offices: one located in a lower-income tract, two in moderate-income tracts, two in middle-income tracts, and one in an upper-income tract.

Cabell County is located in extreme 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.

Boyd County is located in extreme eastern Kentucky along the Ohio River. Ashland is the largest city, while Catlettsburg serves as the county seat. The county had a population of 49,542, according to the 2010 U.S. Census.

Greenup County is located in extreme eastern Kentucky along the Ohio River. Flatwoods is the largest city, while Greenup serves as the county seat. The county had a population of 36,910 as of the 2010 U.S. Census.

According to the June 30, 2016 FDIC Deposit Market Share Report, Peoples Bank ranked 14<sup>th</sup> out of 19 institutions in the market with a deposit share of 3.7% in the assessment area.<sup>1</sup>

As shown in the table below, Huntington Federal Savings Bank had the majority of the market share with 11.6% of deposits. The next three largest institutions, First Sentry Bank, Inc., JPMorgan Chase Bank National Association, and Branch Banking and Trust Company, had 11.5%, 9.6%, and 8.9% of the market share, respectively. Deposits in this assessment area accounted for 5.0% of Peoples' total deposits. This was the fourth-highest percentage of deposits within Peoples' CRA footprint.

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

#	Financial Institution	Deposit Market Share
1	Huntington Federal Savings Bank	11.6%
2	First Sentry Bank, Inc.	11.5%
3	JPMorgan Chase Bank, National Association	9.6%
4	Branch Banking and Trust Company	8.9%
5	City National Bank of West Virginia	8.7%
6	TOWN SQUARE BANK	7.1%
7	The First State Bank	5.4%
8	Fifth Third Bank	5.4%
9	PNC Bank, National Association	4.9%
10	Community Trust Bank, Inc.	4.9%
11	First & Peoples Bank and Trust Company	4.8%
12	United Bank	4.3%
13	Kentucky Farmers Bank Corporation	4.0%
14	Peoples Bank	3.7%

Peoples originated 115 HMDA loans and 641 CRA loans, which represented 4.8% and 6.4% of the total loans originated during the evaluation period, respectively. This was the fourth-largest HMDA market and sixth-largest CRA market for loans originated during the evaluation period.

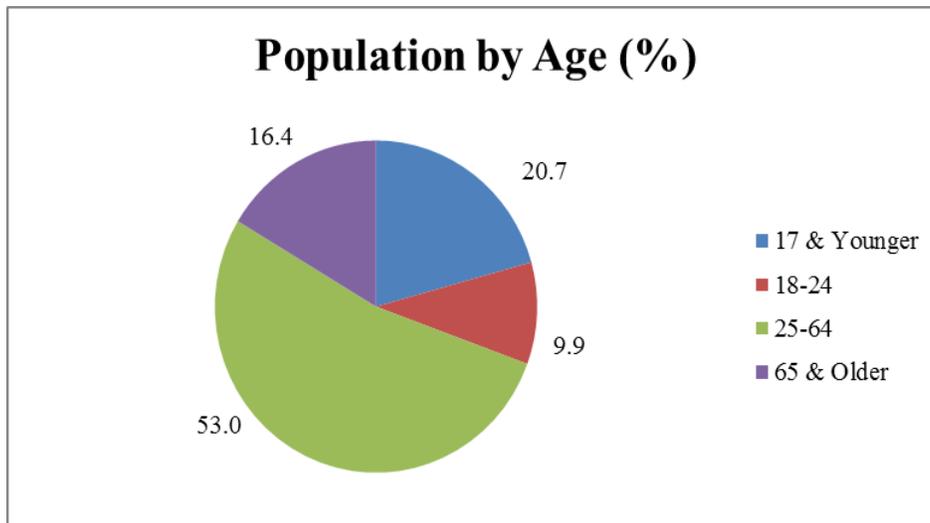
In 2015, Peoples ranked 29<sup>th</sup> among 168 HMDA reporters in the assessment area. City National Bank of West Virginia, Town Square Bank, Quicken Loans, and First State Bank were the top four HMDA lenders in the assessment area. Peoples ranked 17<sup>th</sup> of 44 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express Bank FSB, Synchrony Bank, Capital One Bank USA National Association, and U.S. Bank National Association. These lenders are mostly issuers of credit cards whose CRA loans primarily consist of commercial credit card accounts.

One community contact interview provided additional information regarding the assessment area. The contact represented an economic and community development organization and stated the economic condition is lagging behind the rest of the country, but beginning to stabilize. The contact noted several large area employers have left or reduced operations in the area primarily due to an increase in foreign steel imports. While the organization works with the county and state to help provide funding, incentives, and grants to businesses entering the area, a local industrial park has remained unsold for over ten years. The contact believed that banks are meeting the credit needs of small businesses in the area, but many seem unwilling to take a risk on newer or start-up businesses.

### **Population Characteristics**

According to the 2010 U.S. Census, the total population in the assessment area was 182,771. Approximately, 6.4% of the assessment area's population resides in low-income tracts and 15.2% in moderate-income tracts, while 53.6% reside in middle-income tracts and 24.8% reside in upper-income tracts.

As shown in the chart below, 79.3% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 62.9% of the population is between the ages of 18 and 64 and more likely to have credit needs.



The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase or decrease; overall, the assessment area’s population decreased 0.8%. Boyd and Greenup counties experienced the greatest amount of decline with a 2.5% and 2.3% decrease, respectively, while Cabell County experienced a slight increase of 0.5% respectively.

County	2010 Population	2015 Population	Population Percent Change
Boyd KY	49,542	48,325	-2.5%
Greenup KY	36,910	36,068	-2.3%
Cabell WV	96,319	96,844	0.5%
<b>Total</b>	<b>182,771</b>	<b>181,237</b>	

**Income Characteristics**

According to data from the United States Department of Housing and Urban Development (HUD), the 2010 median family income levels for the assessment area was \$50,009. The MSA-estimated median family income levels increased in 2014, 2015, and 2016, as detailed in the following table.<sup>2</sup>

<sup>2</sup> HUD Median Family Income: <http://www.huduser.org/portal/datasets/il/il13/index.html>

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

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2014</b>	<b>\$52,700</b>	0 - \$26,349	\$26,350 - \$42,159	\$42,160 - \$63,239	\$63,240 - & above
<b>2015</b>	<b>\$55,400</b>	0 - \$27,699	\$27,700 - \$44,319	\$44,320 - \$66,479	\$66,480 - & above
<b>2016</b>	<b>\$56,900</b>	0 - \$28,449	\$28,450 - \$45,519	\$45,520 - \$68,279	\$68,280 - & above

In 2010, the assessment area comprised 74,480 households, of which 47,793 (64.2%) are designated as families. Low- and moderate-income families represent 21.5% and 18.1% of all families in this assessment area. Of the 13.8% of total families below the poverty level, Kentucky had the highest percentage of low- and moderate-income families at 13.5%, followed by West Virginia at 12.8%.

Based on data from the U.S. Census Bureau’s Small Area Income and Poverty Estimates (SAIPE),<sup>3</sup> household poverty rates for the counties in the assessment area were as follows:

County	2014 Poverty Rate	2015 Poverty Rate	Change
Boyd, KY	23.10%	20.50%	-12.68%
Greenup, KY	16.40%	16.80%	2.38%
<b>Kentucky</b>	<b>19.00%</b>	<b>18.30%</b>	<b>-3.83%</b>
Cabell, WV	21.90%	20.20%	-8.42%
<b>West Virginia</b>	<b>18.30%</b>	<b>18.00%</b>	<b>-1.67%</b>
<b>United States</b>	<b>15.50%</b>	<b>14.70%</b>	<b>-5.44%</b>

The poverty rate for Boyd and Cabell counties decreased at a higher rate than both Kentucky and West Virginia and the national rate, while the poverty rate for Greenup County increased. Boyd and Cabell counties continue to exceed poverty rates of Kentucky, West Virginia, and the nation, while the poverty rate in Greenup County is below Kentucky, but above the nation.

**Labor, Employment and Economic Characteristics**

The following table identifies the largest industries by average employment and major employers in this assessment area, according to Think Kentucky and Data USA.<sup>4</sup>

<sup>3</sup> U.S. Department of Commerce: <https://www.census.gov/programs-surveys/saie.html>

<sup>4</sup> Kentucky industries and major employers: [http://www.thinkkentucky.com/cmnty/prntbl\\_all.aspx?cw=025](http://www.thinkkentucky.com/cmnty/prntbl_all.aspx?cw=025)

West Virginia primary employment sector: [https://datausa.io/profile/geo/cabell-county-wv/#category\\_industries](https://datausa.io/profile/geo/cabell-county-wv/#category_industries)

West Virginia major employers:

<http://www.wvcommerce.org/business/siteselector/communityprofiles/county/cabell/6/default.aspx>

County	Primary Employment Sectors	Major Employers
Boyd and Greenup Counties (KY)	Manufacturing; Construction; Other; Public Administration; Information; Financial Activities; Services; Trade, Transportation, and Utilities.	AK Steel; Cattlesburg Refining LLC; Calgon Carbon Corp.; Marine Repair Facility; Harbison Walker International.
Cabell County (WV)	Legal; Architecture & Engineering; Health Practitioners; Management; Computer & Mathematical.	St. Mary's Medical Center, Inc.; Cabell Huntington Hospital, Inc.; Marshall University; GC Services Limited Partnerships; Huntington Alloys Corporation; PRC LLC; Akron Manufacturing, Ltd.; Steel of West Virginia, Inc.; Wal-Mart Stores, Inc.; US Department of Defense.

The following table shows the average annual unemployment rate 2014, 2015, and 2016 for the counties in the MSA, Kentucky, West Virginia, and the nation.

### Unemployment Rates

#### Peoples Bank, Marietta, OH: Huntington-Ashland, WV-KY-OH - MSA

Area	Years - Annualized		
	2014	2015	2016
Boyd Co.	6.1	7.4	7.2 (P)
Greenup Co.	7.2	8.4	7.7 (P)
<b>Kentucky</b>	<b>4.9</b>	<b>5.5</b>	<b>4.5 (P)</b>
Cabell Co.	4.7	4.3	3.9 (P)
<b>West Virginia</b>	<b>6.0</b>	<b>5.9</b>	<b>5.1 (P)</b>
<b>Huntington-Ashland, WV-KY-OH MSA</b>	<b>5.7</b>	<b>5.8</b>	<b>5.3 (P)</b>
<b>National</b>	<b>5.4</b>	<b>4.8</b>	<b>4.5</b>

Not Seasonally Adjusted, Data Extracted on February 7, 2017

P: Preliminary

The unemployment rate for Cabell County was lower than West Virginia and the nation for all three years. The unemployment rates for both Greenup and Boyd counties exceeded the MSA, state, and national rates for all three years.

### Housing Characteristics

There were 84,429 housing units and 47,793 families in this assessment area, based on the 2010 U.S. Census. From an income perspective, 24.1% of housing units, 14.0% of owner-occupied units, and 17.5% of families are located in low- or moderate-income tracts. In addition, 77.0% of the housing units located in low-income census tracts comprise of rental or vacant units, while 23.0% are owner-occupied. Housing units located in moderate-income census tracts comprise 60.6% of rental or vacant and 39.8% owner-occupied units. The high number of rental and vacant units in low- and moderate-income tracts compared to the number of families in these tracts suggests there is limited opportunity for mortgage credit in low- and moderate-income geographies.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 45 years, with 28.2% of housing built prior to 1950. The oldest housing stock was in Cabell and Boyd counties with a median age of 47 and 43 years, followed by Greenup at 37 years. However, the median age of housing stock was 59 years in low-income tracts and 61 years in moderate-income tracts within the assessment area. Older homes are typically more likely to require repairs and rehabilitation, which indicates opportunities for Peoples to provide home improvement and rehabilitation loans in lower-income areas.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$94,613 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 of \$56,900 for the Huntington-Ashland MSA, approximately 55.6% of the homes valued up to \$104,285 in the assessment area would be considered affordable for low-income individuals and 78.8% 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, with an appreciation of 11.7% over the prior year. The median home costs in Boyd and Greenup Counties were \$94,800 and \$78,100, respectively, representing year-over-year appreciations of 5.6% and 17.1%.<sup>5</sup>

According to the 2010 U.S. Census, the median gross rent in the assessment area was \$570, with 16.1% of the rental units having rents of less than \$350 a month. The majority of rents (29.9%) in this assessment area were \$500 to \$699 per month, while 16.2% of rents were \$350 to \$499, and 26.3% of rents were greater than \$700. Approximately 27.8% of all housing units in the assessment area are rental units. Additionally, 44.4% of renters have rent costs greater than 30.0% of their income.

The following table contains information about foreclosure filings in the assessment area according to Realtytrac.<sup>6</sup>

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5 Sperling's Best Places, [www.bestplaces.net](http://www.bestplaces.net)

6 Realtytrac: [www.realtytrac.net](http://www.realtytrac.net)

Geography Name	Ratio of Properties Receiving Foreclosure Filings (January 2017)
Boyd County	1:1,568
Greenup County	1:1,422
<b>Kentucky</b>	<b>1:3,098</b>
Cabell County	1:3,081
<b>West Virginia</b>	<b>1:7,529</b>
<b>United States</b>	<b>1:1,594</b>

One in every 3,081 properties in Cabell County was in foreclosure in January 2017, which was higher than West Virginia’s ratio of one in every 7,529 properties. One in every 1,568 properties in Boyd County and one in every 1,422 properties in Greenup County were in foreclosure, which were higher than Kentucky’s rate of one in every 3,098.

The following table illustrates the demographics in the Huntington-Ashland MSA.

## 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	5	9.8	1,856	3.9	710	38.3	10,297	21.5
Moderate-income	12	23.5	6,486	13.6	1,923	29.6	8,626	18
Middle-income	23	45.1	26,640	55.7	3,044	11.4	9,556	20
Upper-income	11	21.6	12,811	26.8	918	7.2	19,314	40.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>51</b>	<b>100.0</b>	<b>47,793</b>	<b>100.0</b>	<b>6,595</b>	<b>13.8</b>	<b>47,793</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	5,623	1,293	2.5	23	3,112	55.3	1,218	21.7
Moderate-income	14,731	5,868	11.5	39.8	6,703	45.5	2,160	14.7
Middle-income	43,308	29,288	57.4	67.6	9,264	21.4	4,756	11
Upper-income	20,767	14,601	28.6	70.3	4,351	21	1,815	8.7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>84,429</b>	<b>51,050</b>	<b>100.0</b>	<b>60.5</b>	<b>23,430</b>	<b>27.8</b>	<b>9,949</b>	<b>11.8</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	827	11	709	10.4	113	17.3	5	7.2
Moderate-income	1,620	21.5	1,404	20.6	204	31.1	12	17.4
Middle-income	3,114	41.4	2,876	42.3	193	29.5	45	65.2
Upper-income	1,965	26.1	1,813	26.7	145	22.1	7	10.1
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>7,526</b>	<b>100.0</b>	<b>6,802</b>	<b>100.0</b>	<b>655</b>	<b>100.0</b>	<b>69</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.4</b>		<b>8.7</b>		<b>.9</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	4	2.9	4	2.9	0	0	0	0
Middle-income	94	68.1	93	67.9	1	100	0	0
Upper-income	40	29	40	29.2	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>138</b>	<b>100.0</b>	<b>137</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>99.3</b>		<b>.7</b>		<b>.0</b>	

2016 FFIEC Census Data and 2015 D&B Information

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN HUNTINGTON- ASHLAND, WV-KY-OH METROPOLITAN STATISTICAL AREA #26580**

### **Lending Test**

Lending performance in this assessment area is rated “Outstanding.” Peoples demonstrated a good responsiveness to the credit needs of the community. In addition, Peoples originated seven community development loans totaling \$12.7 million in the area and had a good geographic distribution of loans and limited lending gaps. Peoples had an excellent distribution among borrowers of different income levels and a good distribution to businesses of different revenue sizes. Peoples exhibited an excellent record of serving the credit needs of highly economically disadvantaged areas, low-income individuals, or businesses with gross annual revenues of \$1 million or less in the assessment area. The extensive use of flexible lending practices augmented Peoples’ performance in this assessment area.

Greatest consideration was given to the evaluation of small business lending based on overall volume, followed by home purchase and home improvement lending. There were not enough refinance loans to conduct a meaningful analysis and there were no multi-family or small farm loans. Generally, equal weight was given to both geographic and borrower distribution based on the percentage of low- and moderate-income tracts (33.3%) and low- and moderate-income individuals (39.6%). In addition, Peoples’ lending performance was compared to the 2014 and 2015 aggregate performance of all lenders required to report HMDA data within the respective assessment areas. Details of Peoples’ residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix D.

### ***Lending Activity***

Lending activity reflects a good responsiveness to the credit needs within the assessment area. Peoples originated 86 small business loans, 48 home purchase, 41 home improvement, and 26 home refinance loans in this assessment area. This represents 5.4% of Peoples’ total lending and is greater than the percentage of total deposits at 5.0% in this area.

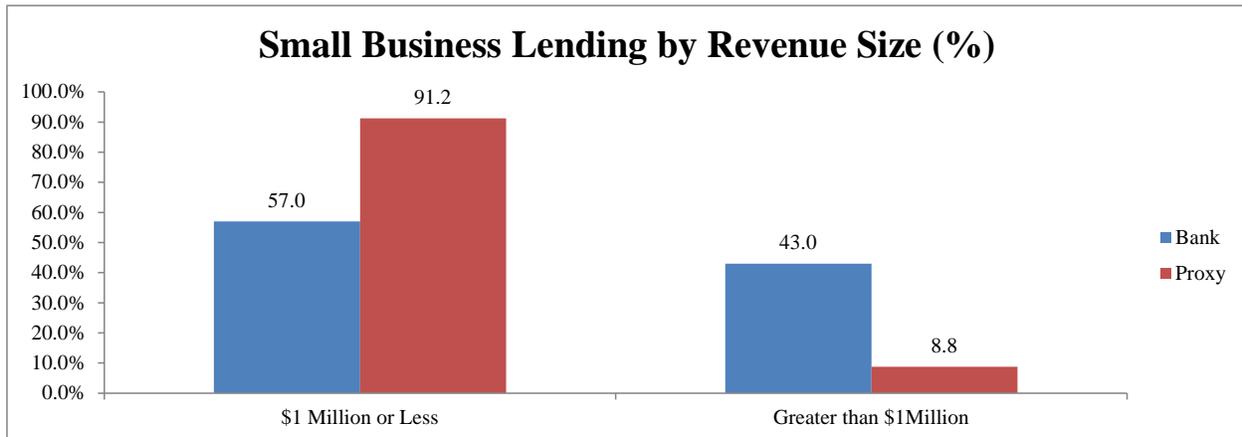
### ***Borrower Distribution of Lending***

Overall, the distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is good for small business with revenues less than or equal to \$1 million and excellent for home purchase and home improvement loans.

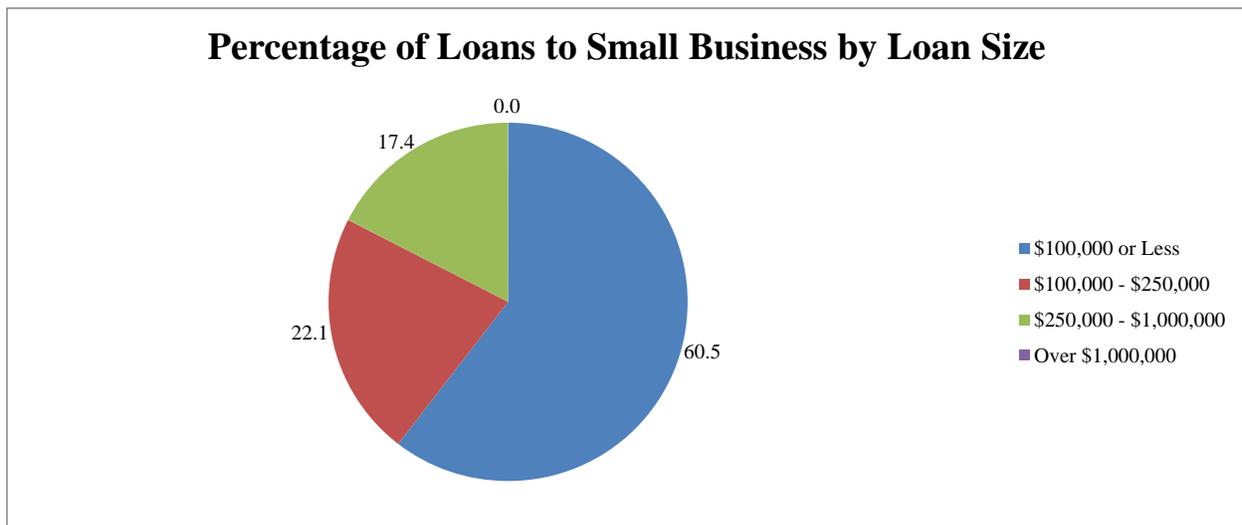
Two of three counties in the assessment area had poverty rates in 2015 higher than the rates for Kentucky (20.2%), West Virginia (18.0%), and the nation (14.7%). As mentioned previously, based on the 2015 median family income for the MSA, 55.6% of the homes valued up to \$104,285 would be considered affordable for low-income individuals and approximately 78.8% of the homes valued up to \$166,857 would be considered affordable for moderate-income individuals. Given the high poverty rates in the area, it is likely that home mortgage lending to low- and moderate-income borrowers may be limited.

### Small Business Lending

As depicted in the graph below, Peoples' lending to businesses with revenue of \$1 million or less is below the percentage of such businesses in the assessment area (proxy). Peoples was above the aggregate of lenders reporting CRA Small Business and Small Farm data for 2015 and at aggregate for 2014.



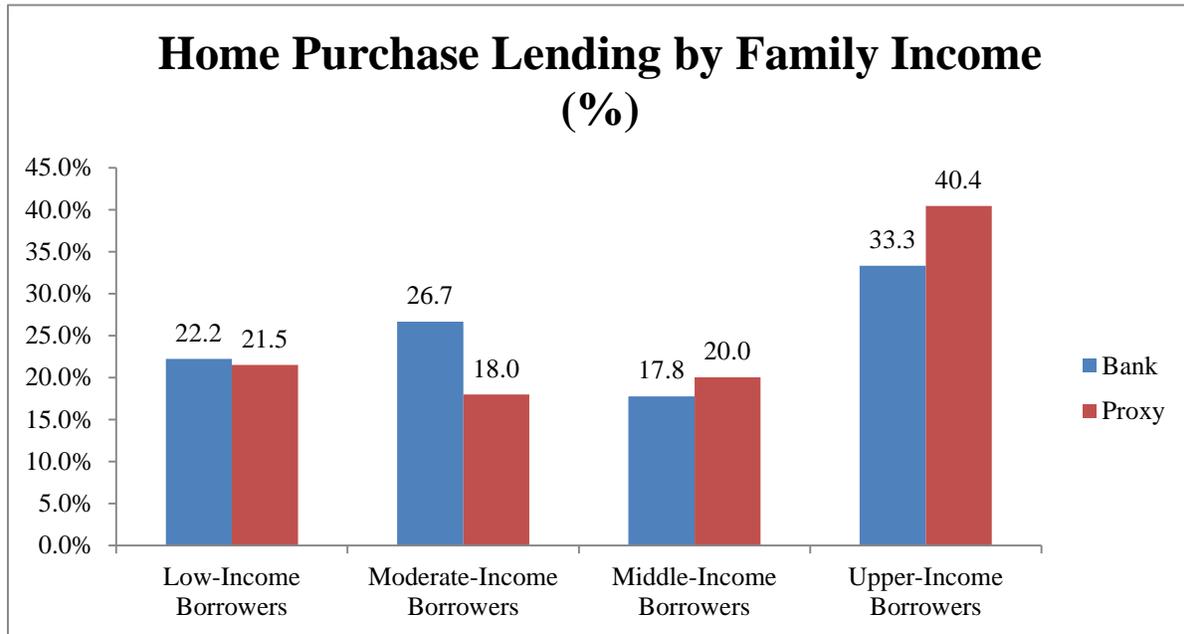
Further analysis of small business lending shows that 60.5% of Peoples' small business loans were made for \$100,000 or less. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed, as smaller businesses often have a greater need for small-dollar loans. The distribution of loans based for small business lending to businesses based on revenue size is considered good.



### Home Purchase Lending

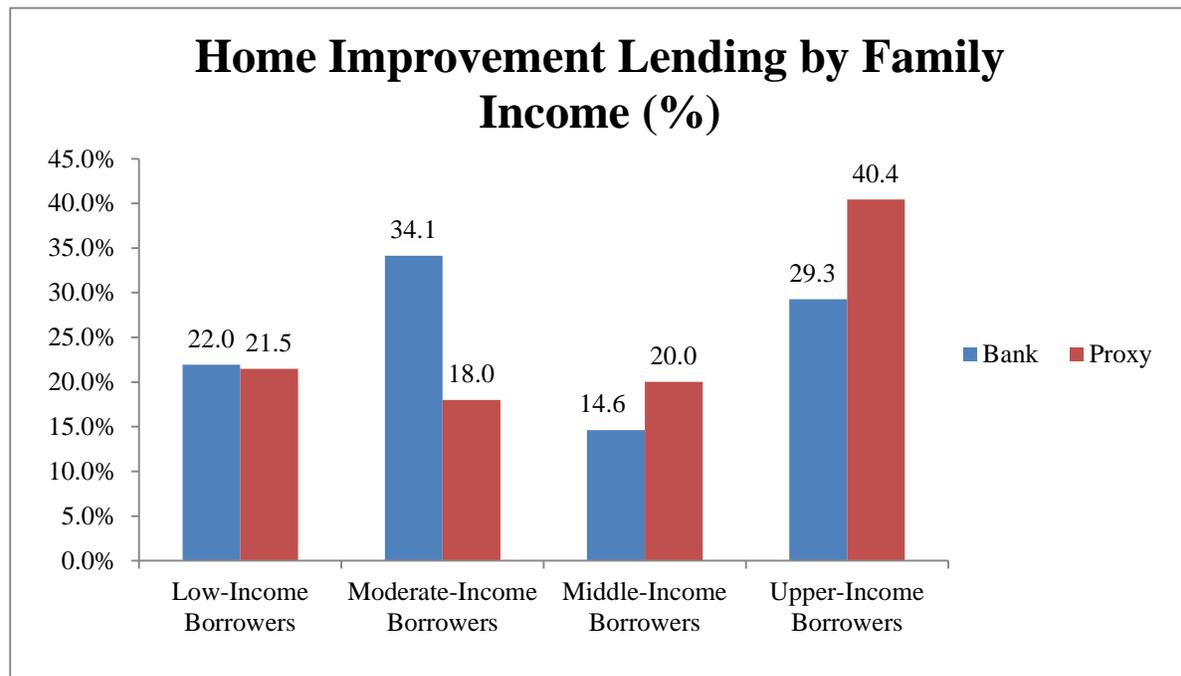
Peoples' performance was compared to the income levels of families in the assessment area (proxy) that are HMDA reporters. As shown in the chart below, Peoples' home purchase lending is slightly above proxy for low-income borrowers and above for moderate-income borrowers.

Home purchase lending among borrowers of different incomes is considered excellent.



### Home Improvement Lending

Peoples' home improvement lending to low-income borrowers was slightly above the percentage of low-income families (proxy) and above for moderate-income borrowers. Home improvement lending among borrowers of different incomes is excellent.



***Geographic Distribution of Lending***

Peoples overall distribution of lending among geographies is good. Small business, which is the largest loan category, is good, as is home improvement lending. Home purchase lending is excellent. Further, there were limited levels of lending gaps. The following lending gaps were noted in the assessment area:

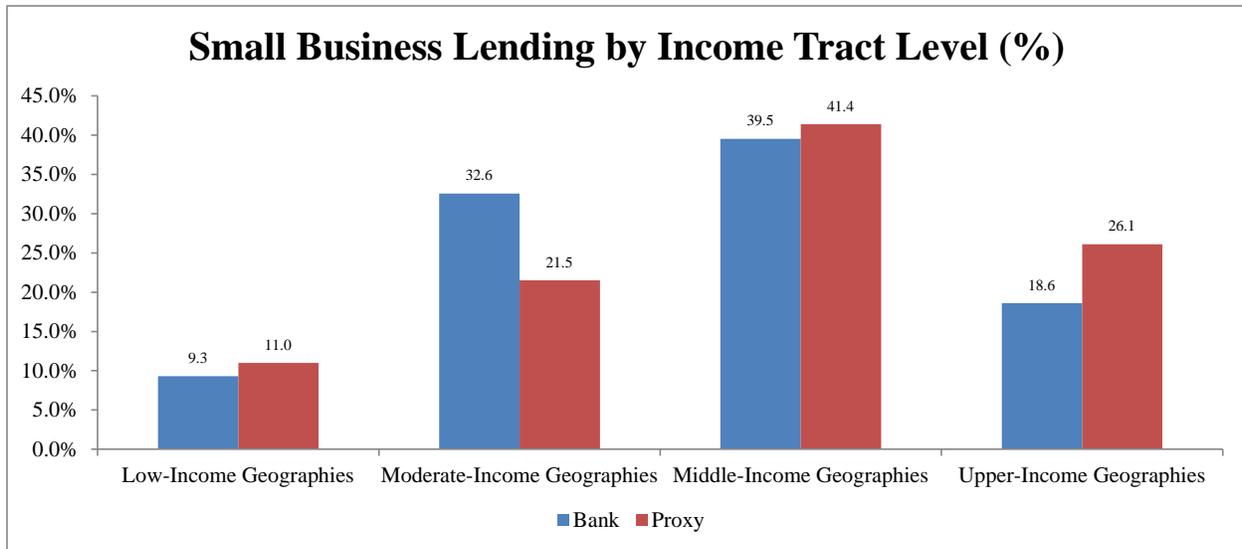
Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	5	2	60.0%
Moderate	12	2	83.3%
Middle	23	2	91.3%
Upper	11	2	81.8%
<b>Total</b>	<b>51</b>	<b>8</b>	<b>84.3%</b>

Peoples made loans in three of the five low-income census tracts (60.0%) and 10 of the 12 moderate-income census tracts (83.3%). Overall, Peoples made loans in 43 of the 51 census tracts (84.3%) in the assessment area, which is considered reasonable.

Peoples has one branch in a low-income census tract in the Huntington-Ashland MSA. Downtown Huntington, where the majority of the assessment area’s low-income tracts are located, is a heavily banked area. Based on the 2010 U.S. Census data, 3.9% and 13.6% of families reside in low- and moderate-income tracts, while only 6.7% and 17.7% of all housing units are in low- and moderate income tracts. Of the units in low- and moderate-income tracts, only 14.0% are owner-occupied, which was lower than the overall owner-occupancy rate for the assessment area of 60.5%, whereas 41.9% are rental and 34% are vacant. It should be noted that Marshall University is located in low-income tracts, which could account for the high percentage of rental units in those tracts. Additionally, the Cabell Huntington Hospital and various parks and cemeteries are located in moderate-income areas, which may contribute to the limited opportunities to originate residential mortgage loans.

***Small Business Lending***

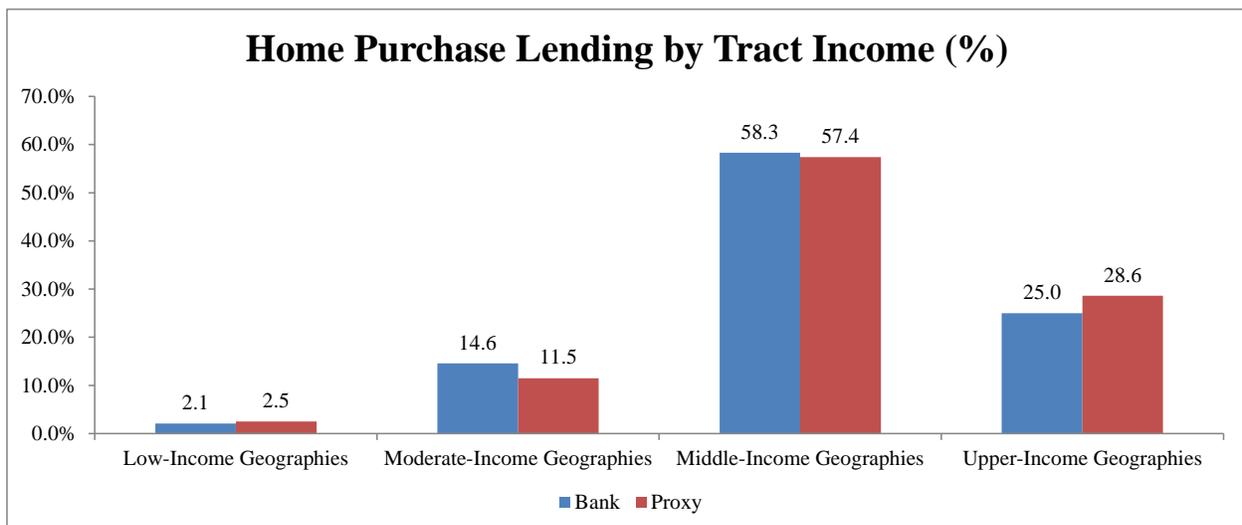
As shown in the chart below, small business lending was slightly below the percentage of small businesses located in low-income tracts (proxy) and well above proxy for moderate-income tracts.



Overall, the geographic distribution of small business lending is good.

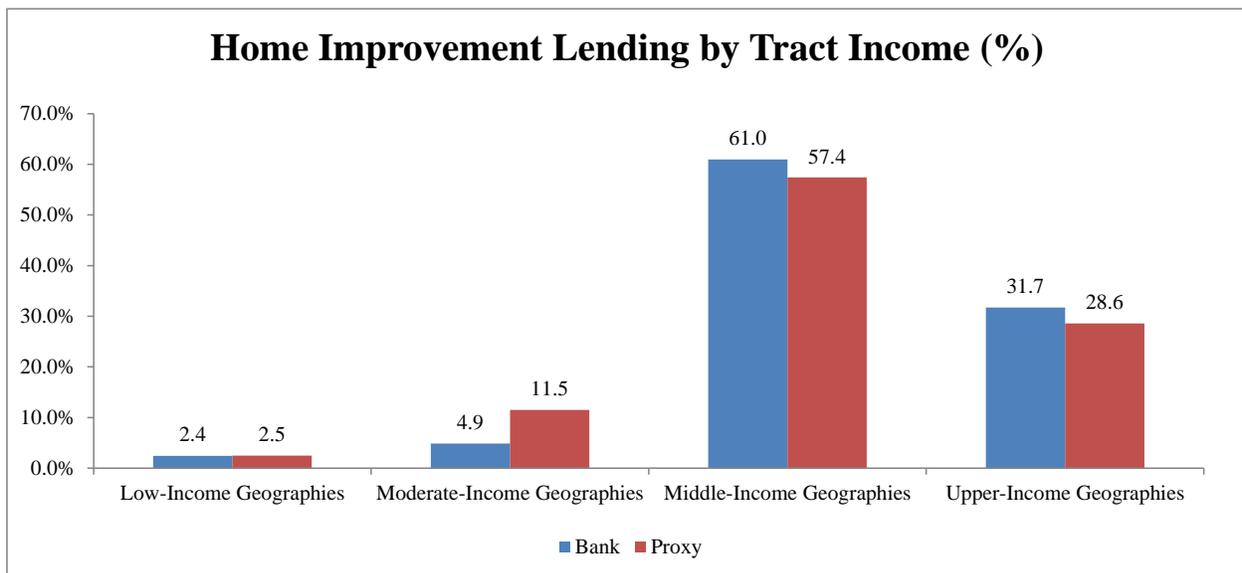
#### *Home Purchase Lending*

Home purchase lending in low-income tracts was slightly below the percentage of owner-occupied units (proxy), above proxy for moderate-income tracts, and above aggregate in 2015. Given the housing characteristics in this assessment area, the geographic distribution of home purchase loans is considered excellent.



*Home Improvement Lending*

Peoples’ home improvement lending in low-income tracts was slightly below the percentage of owner-occupied units (proxy) and below proxy for moderate-income tracts. Peoples was above aggregate in low-income tracts in 2014 and 2015, but below aggregate in moderate-income tracts for both years. Lending opportunities may be limited in moderate-income tracts given the fact that only 13.6% of families reside in moderate-income tracts. Additionally, only 17.5% of the housing units, many of which are rental or vacant, are located in moderate-income tracts. There is also a hospital, various parks, and cemeteries that may also limit lending opportunities. The geographic distribution of home improvement loans is considered good.



*Community Development Loans*

Peoples originated seven community development loans totaling \$12.7 million. Community development lending in this assessment area represented 19.3% of the total dollar volume of community development loans originated by Peoples during the evaluation period, while this area represented 5.0% of the bank’s total deposits. Overall, Peoples makes a relatively high level of community development loans in this assessment area.

Of the seven loans made, five supported community services geared toward low- and moderate-income individuals. The largest community services loan was a working capital loan for \$1.5 million to a healthcare provider for predominantly low- or moderate-income families; a portion of this loan (\$75,000) also serves another assessment area. Two community development loans, one for \$8.5 million and the second for \$2.5 million, will support economic development efforts via construction of a new barge painting and repair facility that will provide new jobs throughout the Huntington-Ashland MSA.

***Flexible Lending Programs***

In addition to traditional bank products, Peoples offers and participates in flexible lending programs such as the Small Business Administration (SBA) loans to small businesses, which are more complex to originate; USDA Rural Housing loans; Section 502 loans primarily used to help low-income borrowers purchase homes in rural areas; Welcome Home Grants that provide grant money (\$5,000 per household) to low- or moderate-income applicants for down payment and closing cost assistance; and the Hardest Hit Fund Program (in Ohio, the program is ‘Save the Dream Ohio;’ in Kentucky, it is ‘Protect my Kentucky Home’), which provides mortgage assistance to unemployed borrowers. In addition, Peoples developed an internal low-income product, ‘Dreams 2 Keys,’ which provides viable lending options specific to low-income borrowers. These types of programs allow Peoples to address the credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented its performance within the assessment area. The following table provides a breakout of the various flexible loan programs offered during the review period.

<b>Flexible Lending Program</b>	<b>Total Number of Loans</b>	<b>Total Balance</b>
SBA	1	\$250,000
Welcome Home Grants	8	\$601,410
Protect my Kentucky Home	2	\$208,807
Dreams 2 Keys	25	\$1,753,745
<b>Total</b>	<b>36</b>	<b>\$2,813,962</b>

**Investment Test**

Peoples made four investments totaling \$750,383 in this assessment area geared toward affordable housing community development. The largest investment (\$498,337) was a new bond purchase to increase the supply of residential housing and financing for low- and moderate-income families. The remaining investments included prior period balances and a bond purchase supporting affordable housing. In addition, 17 donations were made totaling \$35,173 that supported a variety of activities covering community services to low- and moderate-income individuals, including, but not limited to, replenishing food pantries, financial literacy and economic development for disaster relief, and support for small businesses.

Community development investments and donations for this assessment area represent 5.5% of the total dollar volume of community development investments and donations originated overall by Peoples during the evaluation period. This is slightly more than the percentage of total deposits of 5.0% and is considered to be an excellent level of qualified community development investments and donations.

**Service Test**

***Retail Services***

Delivery services are readily accessible. Peoples did not open or close any offices in this assessment area since the previous evaluation and its record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income families. Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or families and are consistent with the services and hours discussed in the institutional assessment.

Peoples had a total of six banking centers within this assessment area as of February 27, 2017, including one in low-, two in moderate-, two in middle-, and one in upper-income census tracts. The banking centers in this assessment area represent 8.1% of all Peoples’ banking centers. Peoples had a total of five full-service ATMs within this assessment area, including one in low-, one in moderate-, two in middle-, and one in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts and the percentage of families living in those tracts.

<b>Tract Income Category</b>	<b>Percentage of Banking Centers</b>	<b>Percentage of ATMs</b>	<b>Percentage of Tracts</b>	<b>Percentage of Families in Tracts</b>
Low	16.7%	20.0%	9.8%	3.9%
Moderate	33.3%	20.0%	23.5%	13.6%
Middle	33.3%	40.0%	45.1%	55.7%
Upper	16.7%	20.0%	21.6%	26.8%

This branch/ATM distribution reflects an excellent dispersion within low- and moderate-income tracts.

***Community Development Services***

Peoples provided a limited level of community development services in the assessment area. Three staff members provided community services to 15 different organizations for a total of 69 hours. Services provided included financial expertise on boards and committees and financial education.

## STATE OF OHIO

### **CRA RATING for State of Ohio: Satisfactory**

**The lending test is rated: High Satisfactory**

**The investment test is rated: Outstanding**

**The service test is rated: High Satisfactory**

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- An good geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and a good distribution to businesses of different revenue sizes;
- An adequate record of serving the credit needs of low-income individuals and areas and very small businesses;
- Makes a relatively high level of community development loans;
- An extensive use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants, often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- An adequate level of community development services.

## SCOPE OF EXAMINATION

Full-scope reviews were conducted for Non-metropolitan Central Ohio and the Cincinnati and Columbus MSAs. Limited-scope reviews were performed on the remaining four assessment areas, the Akron, Cleveland, and Dayton MSAs and Non-metropolitan Southeastern Ohio. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the institution section of this report.

Non-metropolitan Central Ohio received greater weight in determining the CRA rating for the state, as this area had the largest lending volume, share of deposits, and number of banking centers during the evaluation period. Lastly, Non-metropolitan Central Ohio represented 52.0% of the banking centers, 14.9% of deposits, and 69.6% of lending in Ohio.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF OHIO**

Lending activity accounted for 77.8% of Peoples' total lending activity, while deposits accounted for 84.2% of its total deposits. HMDA-reportable lending in Ohio represented 74.7% of Peoples' HMDA lending, while CRA-reportable lending represented 83.4% of its total CRA lending. As of June 30, 2016, Peoples ranked 11<sup>th</sup> among 106 insured institutions with a deposit market share of 2.2%. As of February 27, 2017, there were 55 banking center locations within Ohio.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OHIO**

### **Lending Test**

Peoples' performance under the lending test within the assessment areas located in Ohio is rated "High Satisfactory." Peoples' lending reflects a good responsiveness to the credit needs in the full-scope assessment areas and adequate responsiveness in the limited-scope assessment areas.

### ***Lending Activity***

Peoples originated 1,801 HMDA loans and 1,122 small business loans during the evaluation period in Ohio. This represents 77.8% of Peoples' total lending and is slightly less than the percentage of total deposits at 84.2% for Ohio.

Lending activity in Ohio is considered good. Lending activity in Non-metropolitan Central Ohio and the Cincinnati and Columbus MSAs is considered good and adequate for the remaining four limited-scope assessment areas.

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

Overall, the distribution of loans among borrowers of different income levels and to businesses of different revenue sizes is good. Distribution to borrowers of different income levels is excellent in the Cincinnati and Columbus MSAs and good in Non-metropolitan Central Ohio. Borrower distribution to businesses of different revenue sizes is good in the Cincinnati and Columbus MSAs and Non-metropolitan Central Ohio. The distribution to borrowers of different income levels is good in the Akron and Dayton MSAs and Non-metropolitan Southeastern Ohio and adequate in the Cleveland MSA. Borrower distribution to businesses of different revenue sizes is excellent in Non-metropolitan Southeastern Ohio, good in the Akron and Dayton MSAs, and adequate in the Cleveland MSA.

Overall, the distribution of loans among geographies is good. Geographic distribution is excellent in the Cincinnati and Columbus MSAs and good in Non-metropolitan Central Ohio. No significant gaps in lending were identified. Geographic distribution is adequate in the Dayton and Cleveland MSAs and Non-metropolitan Southeastern Ohio and good in the Akron MSA.

Although lending gaps were identified in the limited-scope areas, it should be noted that Peoples is relatively new to these markets. Overall, gaps in lending may also be attributed to lower owner-occupancy rates, a lower percentage of families, a higher percentage of families below poverty, and a higher percentage of rental and vacant units, especially in low- and moderate-income areas. It is expected that lending penetration in these markets improves as time elapses.

A detailed analysis for the borrower and geographic distribution is provided with the analysis for each assessment area.

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

In Ohio, Peoples originated 38 community development loans totaling \$53.2 million, which represented 80.5% of Peoples' community development lending by dollar volume. Peoples is a leader in making community development loans in Non-metropolitan Central Ohio and makes a relatively high level of community development loans in the Cincinnati and Columbus MSAs. Peoples makes a relatively high level of community development lending in the Akron and Cleveland MSAs. No community development loans were made in the Dayton MSA and Non-metropolitan Southeastern Ohio. Overall, Peoples makes a relatively high level of community development loans in Ohio.

### ***Flexible Lending***

Overall, Peoples makes extensive use of flexible lending practices within assessment areas located in Ohio.

### **Investment Test**

Peoples' performance under the investment test within the assessment areas located in Ohio is rated "Outstanding." Peoples funded \$12.0 million in qualified community development investments and donations in Ohio during the evaluation period, consisting of \$5.4 million obtained from new investments made during the current review period and \$6.2 million from prior period investments. The majority of investments were mortgage-backed securities (GNMA and FNMA), a New Market Tax Credit, Ohio Housing Financing Funds, and school bonds. The remaining \$371,000 comprised smaller dollar donations. Peoples' level of qualified investments is excellent for all assessment areas located in Ohio, with the exception of the Dayton MSA, where it was good.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

## **Service Test**

Peoples' performance under the service test with the assessment areas located in Ohio is rated "High Satisfactory." Peoples' performance was good in Non-metropolitan Central Ohio and the Cincinnati, Columbus, and Cleveland MSAs and adequate in the Akron and Dayton MSAs and Non-metropolitan Southeastern Ohio.

### ***Retail Services***

Retail delivery systems are accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in the institution's assessment areas. Retail service distribution is excellent in Non-metropolitan Central Ohio and the Cincinnati MSA and adequate in Non-metropolitan Southeastern Ohio and the Columbus, Akron, Cleveland, and Dayton MSAs.

Peoples' record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. Peoples opened 22 branches in Ohio since the last examination: four were in moderate-, 15 were in middle- (six of these are distressed), and two were in upper-income tracts. Peoples closed four branches in Ohio since the last examination: two in moderate- and two in middle-income tracts. The branch closures did not impact Peoples' ability to serve the credit needs of the communities served, particularly moderate-income tracts.

Banking services and business hours do not vary in a way that inconveniences any portions of the bank's assessment areas and are consistent with the services and hours discussed in the Institution assessment.

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

Peoples provided an adequate level of community development services in Ohio. Peoples' performance is good in Non-metropolitan Central Ohio and the Cleveland MSA and adequate in the Cincinnati and Columbus MSAs. Performance is considered poor in the Akron MSA and Non-metropolitan Southeastern Ohio and very poor in the Dayton MSA. In Ohio, 47 board members and staff provided services to 61 different organizations for a total of 4,794 hours.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's Service Test section in this report.

**METROPOLITAN AREA**  
*(Full-scope Review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE  
NON-METROPOLITAN CENTRAL OHIO AREA**

Non-metropolitan Central Ohio consists of the entireties of Athens, Coshocton, Gallia, Guernsey, Jackson, Knox, Meigs, Morgan, Muskingum, Noble, Tuscarawas, Vinton and Washington counties in Ohio. This assessment area consists of a total of 133 census tracts comprised of three low-income census tracts (2.3%), 40 moderate-income census tracts (30.1%), 80 middle-income tracts (60.2%), and 10 upper-income tracts (7.5%). Peoples has 24 offices in this assessment area, one in a low-income tract, 11 in moderate-income tracts, 11 in middle-income tracts, and one in an upper-income tract.

Athens County is located in southeastern Ohio along the Ohio River. Athens is the largest city and county seat. The county had a population of 64,757, according to the 2010 U.S. Census.

Coshocton County is located in eastern central Ohio, with Knox County to the east, Muskingum and Guernsey counties to the south, and Tuscarawas County to the west. Coshocton is the largest city and county seat. The county had a population of 36,901, according to the 2010 U.S. Census.

Gallia County is located in southeastern Ohio along the Ohio River, with Jackson County to the west and Vinton and Meigs counties to the north. Gallipolis is the largest city and county seat. The county had a population of 30,934, according to the 2010 U.S. Census.

Guernsey County is located in eastern central Ohio, with Coshocton and Muskingum counties to the east, Noble County to the south, and Tuscarawas County to the north. Cambridge is the largest city and county seat. The county had a population of 40,087, according to the 2010 U.S. Census.

Jackson County is located in southern Ohio, with Gallia County to the southeast and Vinton County to the north. Jackson is the largest city and county seat. The county had a population of 33,223, according to the 2010 U.S. Census.

Knox County is located in central Ohio, with Coshocton County to the east. Mount Vernon is the largest city and county seat. The county had a population of 60,921, according to the 2010 U.S. Census.

Meigs County is located in southeastern Ohio along the Ohio River, with Vinton County to the east, Gallia County to the south, and Athens County to the north. Pomeroy is the largest city and county seat. The county had a population of 23,770, according to the 2010 U.S. Census.

Morgan County is located in southeastern Ohio, with Athens County to the south, Washington and Noble counties to the east, and Muskingum County to the north. McConnellsville is the largest city and county seat. The county had a population of 15,054, according to the 2010 U.S. Census.

Muskingum County is located in eastern central Ohio, with Morgan County to the south, Guernsey County to the east, and Coshocton County to the north. Zanesville is the largest city and county seat. The county had a population of 86,074, according to the 2010 U.S. Census.

Noble County is located in eastern central Ohio, with Washington County to the south, Morgan and Muskingum counties to the east, and Coshocton and Tuscarawas counties to the north. Caldwell is the largest city and county seat. The county had a population of 14,645, according to the 2010 U.S. Census.

Tuscarawas County is located in eastern central Ohio, with Guernsey County to the south and Coshocton County to the west. New Philadelphia is the largest city and county seat. The county had a population of 92,582, according to the 2010 U.S. Census.

Vinton County is located in southern Ohio, with Jackson and Gallia counties to the south and Meigs and Athens counties to the east. McArthur is the largest city and county seat. The county had a population of 13,435, according to the 2010 U.S. Census.

Washington County is located in southeastern Ohio along the Ohio River, with Athens County to the southeast, Morgan County to the east, and Noble County to the north. Marietta is the largest city and county seat. The county had a population of 61,778, according to the 2010 U.S. Census.

According to the June 30, 2016 FDIC Deposit Market Share Report, Peoples Bank ranked first out of 43 institutions in the market with a deposit share of 14.9% in the assessment area.<sup>7</sup>

As shown in the table below, the next four largest institutions were The Park National Bank, JP Morgan Chase, Huntington National Bank, and Ohio Valley Bank with 12.7%, 9.7%, 8.8%, and 6.1% of the market share, respectively. Deposits in this assessment area accounted for 49.2% of Peoples' total deposits. This assessment area was the leader in the percentage of deposits within Peoples' CRA footprint.

#	Financial Institution	Deposit Market Share
1	Peoples Bank	14.9%
2	The Park National	12.7%
3	JPMorgan Chase National Association	9.7%
4	The Huntington National Bank	8.8%
5	The Ohio Valley Bank Company	6.1%

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

Peoples originated 1,392 HMDA loans (721 home purchase loans, 495 home refinance loans, 172 home improvement loans, and four multi-family loans) and 641 CRA loans (628 small business and 13 small farm), which represented 57.7% and 47.6% of the total loans originated during the evaluation period, respectively. This assessment area was the leader of both HMDA and CRA loan originations during the evaluation period.

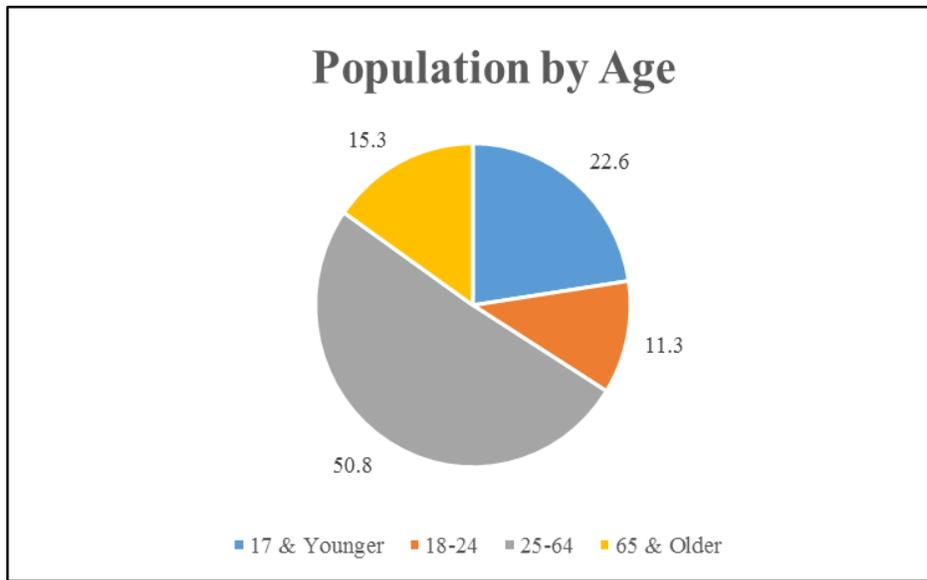
In 2015, Peoples ranked third among 320 HMDA reporters in the assessment area. Park National Bank and Huntington National Bank were the top HMDA lenders in the assessment area. Peoples Bank ranked ninth of 55 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were US Bank, Park National Bank, Synchrony Bank, and American Express. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Two community contact interviews were conducted to provide additional information regarding the assessment area. The first contact represented a government agency that helps revitalize neighborhoods and grow and sustain businesses. According to the contact, banks have been very active in partnering with local non-profits on projects that benefit the community, specifically mentioning Peoples Bank and Settlers Bank. One example provided was the revitalization of the downtown theater, which spurred economic development by bringing in new businesses, restaurants, and tourism to the area. A second project is an emergency repair program, which assists low- and moderate-income families in maintaining the upkeep of their personal residences by providing funds to assist with major repairs that would affect the health and safety of the family, such as roofing and plumbing. The contact stated that the industry of the area has changed from manufacturing to healthcare and tourism.

The second contact was a metropolitan housing authority organization. According to this contact, the area has been hit hard by the downturn in the oil and gas industry. Although jobs were lost, the cost of affordable housing has not adjusted accordingly. The contact stated local banks are willing to work with people affected by the economic downturn, as evidenced by a local bank reaching out to discuss affordable loan options with low interest rates and low down payments for the organization's clients. The contact noted other opportunities exist for financial institutions to provide banking services, especially check cashing. Many of the organization's clients are unbanked and often their checks go uncashed, because banks either refuse to cash them because they are not accountholders or they are charged a fee equal to the value of the check. Assistance is also provided to clients for utility payments. Finding a way to bank these clients or provide fee-free check cashing services is a need within the area.

### **Population Characteristics**

According to the 2010 U.S. Census, the total population in the assessment area was 574,163. Approximately, 2.6% of the assessment area's population resides in low-income tracts and 27.0% resides in moderate-income tracts, while 60.2% reside in middle-income tracts and 7.5% reside in upper-income tracts. As shown in the chart below, 77.4% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 62.1% of the population is between the ages of 18 and 64 and more likely to have credit needs.



The population in Non-metropolitan Central Ohio is relatively stable, as depicted in the following table, which shows the population in the assessment area by county for 2010 and 2015<sup>8</sup> with the percentage of the population increase or decrease.

County	2010 Population	2015 Population	Population Percent Change
Athens	64,757	65,886	1.7%
Coshocton	36,901	36,569	-0.9%
Gallia	30,934	30,142	-2.6%
Guernsey	40,087	39,258	-2.1%
Jackson	33,225	32,596	-1.9%
Knox	60,921	61,061	0.2%
Meigs	23,770	23,257	-2.2%
Morgan	15,054	14,777	-1.8%
Muskingum	86,074	86,290	0.3%
Noble	14,645	14,326	-2.2%
Tuscarawas	92,582	92,916	0.4%
Vinton	13,435	13,048	-2.9%
Washington	61,778	61,112	-1.1%
<b>Total</b>	<b>574,163</b>	<b>571,238</b>	<b>-0.5%</b>

<sup>8</sup> Population data is derived from the U.S. Census Data American Fact Finder (advance search to add geographies) [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=PEP\\_2016\\_PEPANNRES&src=pt](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=PEP_2016_PEPANNRES&src=pt)

**Income Characteristics**

According to data from the United States Department of Housing and Urban Development (HUD), the 2010 median family income levels for the assessment area was \$55,400. The MSA-estimated median family income levels increased from 2014 to 2015, but decreased in 2016, as detailed in the following table.<sup>9</sup>

**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
<b>2014</b>	<b>\$55,700</b>	0	- \$27,849	\$27,850	- \$44,559	\$44,560	- \$66,839	\$66,840	- & above
<b>2015</b>	<b>\$56,900</b>	0	- \$28,449	\$28,450	- \$45,519	\$45,520	- \$68,279	\$68,280	- & above
<b>2016</b>	<b>\$55,400</b>	0	- \$27,699	\$27,700	- \$44,319	\$44,320	- \$66,479	\$66,480	- & above

The assessment area contains 222,752 households, of which 149,026 (66.9%) are designated as families. Low- and moderate-income families represent 22.9% and 19.3% of all families in this assessment area, respectively. Approximately 39.8% of low-income families reside in low- and moderate-income tracts, while 32% of moderate-income families reside in low- and moderate-income tracts. Additionally, 12.8% of families live below the poverty level, compared to Ohio’s rate of 10.3%. Of the families living below poverty, 41.8% reside in low- and moderate-income tracts.

Based on data from the U.S. Census Bureau’s Small Area Income and Poverty Estimates (SAIPE),<sup>10</sup> household poverty rates for the county in the assessment area was as follows:

<sup>9</sup> HUD Medium Family Income: <http://www.huduser.org/portal/datasets/il/il13/index.html>

<sup>10</sup> U.S. Department of Commerce: <https://www.census.gov/programs-surveys/saipe.html>

County	2014 Poverty Rate	2015 Poverty Rate	Change
Athens	29.9%	31.5%	5.1%
Coshocton	18.1%	15.1%	-19.9%
Gallia	26.1%	21.7%	-20.3%
Guernsey	17.2%	18.6%	7.5%
Jackson	20.0%	20.4%	2.0%
Knox	15.1%	14.8%	-2.0%
Meigs	22.6%	22.8%	0.9%
Morgan	18.1%	19.0%	4.7%
Muskingum	19.1%	16.5%	-15.8%
Noble	16.3%	15.0%	-8.7%
Tuscarawas	13.4%	13.0%	-3.1%
Vinton	23.7%	18.9%	-25.4%
Washington	15.7%	15.0%	-4.7%
<b>Ohio</b>	<b>15.80%</b>	<b>14.80%</b>	<b>-6.8%</b>
<b>United States</b>	<b>15.50%</b>	<b>14.70%</b>	<b>-5.4%</b>

All counties with the exception of Knox and Tuscarawas have poverty rates that exceed the state and nation poverty rates for 2015. Poverty rates for Athens, Gallia, Guernsey, Jackson, Meigs, Morgan, Muskingum, Noble and Vinton counties exceed the state and nation for 2014 and 2015. These relatively high poverty rates may indicate that individuals, especially those that are low- or moderate-income, may have difficulty in having sufficient financial resources to obtain loans.

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

The following table identifies the primary employment sectors by number of employees and major employers in this assessment area, according to the Ohio Development Services Agency:<sup>11</sup>

<sup>11</sup> Ohio County Profiles, Ohio Development Services Agency:  
[https://development.ohio.gov/reports/reports\\_countytrends\\_map.htm](https://development.ohio.gov/reports/reports_countytrends_map.htm)

County	Primary Employment Sectors	Major Employers
Athens	Trade, Transportation and Utilities; Education and Health Services; Leisure and Hospitality; Professional and Business; Financial Services	Alexander Local Schools; Athens City Schools; Athens County Government; Diagnostic Hybrids Inc.; ED MAP Inc.; Federal Hocking Local Schools; Hocking College; Nelsonville-York City Schools; OhioHealth O'Bleness Hospital; Ohio University; Rocky Boot Company; Sunpower Inc.; University Medical Associates; Wal-Mart Stores Inc.
Coshocton	Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Local Government; Professional and Business	AK Steel Holding Corp.; American Electric Power Co; Coshocton City Schools; Coshocton County Government; Coshocton County Memorial Hospital; Kraft Heinz Company; McWane Corp/Crow Water Systems; Riverview Local Schools; WestRock/Rock Tenn
Gallia	Education and Health Services; Trade, Transportation and Utilities; Local Government; Leisure and Hospitality; Manufacturing	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 Stores Inc.
Guernsey	Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Leisure and Hospitality; Local Government	Cambridge City Schools, Colgate-Palmolive Co.; Daimler AG/Detroit Diesel; Encore Plastics; Federal-Mogul Corp.; Guernsey County Government; JMC Steel Group/Picoma; Southeastern Ohio Reg. Medical Ctr.; State of Ohio; Wal-Mart Stores Inc.
Jackson	Manufacturing; Trade, Transportation and Utilities; Local Government; Education and Health Services; Leisure and Hospitality	Bellisio Foods Inc.; General Mills Inc.; Holzer Medical Center; Jackson City Schools; Osco Industries Inc.; Wal-Mart Stores Inc.; Wellston City Schools
Knox	Manufacturing; Education and Health Services; Trade, Transportation and Utilities; Local Government; Leisure and Hospitality	Ariel Ltd.; FT Precision; JELD-WEN Inc.; Kenyon College; Knox Community Hospital; Kokosing Construction Co.; Mount Vernon Nazarene University; Mt. Vernon City Schools; Rolls-Royce Plc; Sanoh America Inc.
Meigs	Local Government; Trade, Transportation and Utilities; Education and Health Services; Leisure and Hospitality; Construction	Eastern Local Schools; Extencicare/Rocksprings Rehab Ctr; Gatling Ohio LLC; Meigs County Government; Meigs Local Schools; Overbrook Rehab Center; Southern Local Schools
Morgan	Local Government; Trade, Transportation and Utilities; Manufacturing; Education and Health Services; Leisure and Hospitality	Hann Manufacturing; Highland Oaks; Kroger Co.; Mahle International; Miba Bearings US LLC; Morgan County Government; Morgan Local Schools; Warren's Morgan Co. IGA
Muskingum	Trade, Transportation and Utilities; Education and Health Services; Local Government; Leisure and Hospitality; Manufacturing	5 B's Inc.; AK Steel Holding Co; Avon Products Inc.; AutoZone Inc.; Dollar General Corp.; Genesis HealthCare System; Kellogg's; Lonaberger Co.; Muskingum University; Muskingum County Government; Owens-Illinois/Owens-Brockway; Wendy's International/East Balt Bakeries; Zanesville City Schools
Noble	Trade, Transportation and Utilities; State Government; Local Government; Education and Health Services; Natural Resources and Mining	B&N Coal; Caldwell Exempted Village Schools; International Converter Inc.; Noble County Government; Noble Local Schools; State of Ohio; Summit Acres; Warren Drilling Co.
Tuscarawas	Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Local Government; Leisure and Hospitality	Alamo Group/Gradall Industries; Allied Machine & Engineering; Dover City Schools; Lauren Manufacturing; Marlite, Inc.; New Philadelphia City Schools; Union Hospital; Wal-Mart Stores Inc.; Zimmer Orthopedic
Vinton	Local Government; Manufacturing; Trade, Transportation and Utilities; Education and Health Services; Leisure and Hospitality	Austin Powder Co.; Crownover Lumber Co. Inc.; Huston Nursing Home; State of Ohio; Vinton County Government; Vinton County Local Schools; Vinton County National Bank
Washington	Trade, Transportation and Utilities; Education and Health Services; Manufacturing; Local Government; Leisure and Hospitality; Construction	American Electric Power Co.; Americas Styrenics; Eramet Marietta Inc.; Globe Metallurgical; KRATON Polymers LLC; Marietta City Schools; Marietta College; Marietta Memorial Health System; Pioneer Pipe; RJF International Corp.; Solvay Advanced Polymers; Thermo Fisher Scientific Inc.; Wal-Mart Stores Inc.

The following table illustrates the average annual unemployment rates for 2014, 2015 and 2016 for the Non-metropolitan Central Ohio area, the state and the nation.

**Unemployment Rates**  
**Peoples Bank, Marietta, OH: OH Central Non MSA**

County	Years - Annualized		
	2014	2015	2016
Athens	5.7	5.7	5.6 (P)
Coshocton	6.3	6.0	6.5 (P)
Gallia	6.7	6.4	6.2 (P)
Guernsey	6.3	7.0	7.0 (P)
Jackson	7.6	7.7	7.3 (P)
Knox	4.5	4.9	4.4 (P)
Meigs	8.4	8.2	7.4 (P)
Morgan	7.4	8.7	7.9 (P)
Muskingum	6.2	6.1	5.8 (P)
Noble	6.6	8.8	8.6 (P)
Tuscarawas	5.0	5.4	5.2 (P)
Vinton	7.1	6.9	7.0 (P)
Washington	5.5	6.5	5.9 (P)
<b>Ohio</b>	<b>4.9</b>	<b>4.6</b>	<b>4.7 (P)</b>
<b>National</b>	<b>5.4</b>	<b>4.8</b>	<b>4.5</b>

Not Seasonally Adjusted, Data Extracted on February 7, 2017

P: Preliminary

Unemployment rates in the majority of counties declined over the two year period; only Coshocton and Vinton counties experienced an increase. Unemployment rates for all counties were higher the state and nation for all three years, with the exception of Knox County, which was lower for 2016. The high percentage of unemployment may indicate that individuals, especially those that are low- or moderate-income, may have difficulty in having sufficient financial resources to obtain loans.

**Housing Characteristics**

Based on the 2010 U.S. Census, there are 252,644 housing units and 149,026 families in this assessment area, From an income perspective, 1.4% of housing units, 21.4% of owner-occupied units, and 0.7% of families are located in low-income tracts and 28.6% of housing units, 56.4% of owner-occupied units, and 26.6% of families are located in moderate-income tracts. Of the families residing in low- and moderate-income tracts, 41.8% are below the poverty level. Over three-quarters of the housing units in the low- and moderate-income census tracts are either rental or vacant (78.7%), while nearly half are rental or vacant in moderate-income tracts (43.6%). The high number of rental and vacant units compared to the number of families in these tracts suggests there is a limited opportunity for mortgage credit in low- and moderate-income geographies.

The median age of housing stock was 40 years, according to the 2010 U.S. Census, with 31.3% of the housing built prior to 1950. Within the assessment area, the median age of housing stock was 61 years in low-income tracts and 49 in moderate-income tracts. Older homes are typically more likely to require repairs and rehabilitation; therefore, this assessment area’s aging housing stock could represent opportunities for Peoples to provide home improvement and rehabilitation loans in low- or moderate-income areas, although high poverty and unemployment levels could make it difficult to make residential mortgage loans.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$105,649 with an affordability ratio of 45.1%. 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 Central Ohio (\$55,400), approximately 47.6% of the homes valued up to \$101,536 in the assessment area would be considered affordable for low-income individuals and 74.5% 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.

The table below shows the median home values and associated appreciation over the prior year for the assessment area. This information obtained from Sperling’s Best Places.<sup>12</sup>

<b>County</b>	<b>Median Home Values</b>	<b>Appreciation (over prior year)</b>
Athens	\$108,200	11.1%
Coshocton	\$90,800	-6.3%
Gallia	\$88,400	-17.8%
Guernsey	\$89,700	9.1%
Jackson	\$86,200	4.0%
Knox	\$126,600	0.4%
Meigs	\$78,900	-1.4%
Morgan	\$84,200	-1.4%
Muskingum	\$105,600	-2.2%
Noble	\$78,900	-1.4%
Tuscarawas	\$116,700	-0.7%
Vinton	\$75,400	-1.4%
Washington	\$102,800	8.5%

The median gross rent in the assessment area was \$573, with 13.4% of the rental units having rents of less than \$350 a month, according to the 2010 U.S. Census. The majority of rents (30.8%) in this assessment area were \$500-\$699 per month, while 18.4% of rents were \$350-\$499 and 26.1% of rents were greater than \$700. Approximately 24.5% of all housing units in the assessment area are rental units. Additionally, 45.1% of renters have rent costs greater than 30.0% of their income.

<sup>12</sup> Sperling’s Best Places, [www.bestplaces.net](http://www.bestplaces.net)

According to Realtytrac,<sup>13</sup> an online database that tracks and provides foreclosure statistics, three of the 11 counties with reported information had foreclosure rates greater than the state and nation (Athens, Guernsey and Muskingum). The following table shows the foreclosure filings in the assessment area, state, and nation.

<b>County</b>	<b>Ratio of Properties Receiving Foreclosure Filings in (January 2017)</b>
Athens	1:592
Coshocton	1:2,227
Gallia	1:2,280
Guernsey	1:848
Jackson	1:3,855
Knox	1:1,690
Meigs	NA
Morgan	NA
Muskingum	1:1,202
Noble	NA
Tuscarawas	1:2,239
Vinton	NA
Washington	1:3,755
<b>Ohio</b>	<b>1:1,285</b>
<b>United States</b>	<b>1:1,594</b>

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

<sup>13</sup> [www.realtytrac.net](http://www.realtytrac.net)

## Combined Demographics Report

Assessment Area(s): Ohio Central 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	3	2.3	1,067	0.7	419	39.3	34,046	22.8
Moderate-income	40	30.1	39,675	26.6	7,532	19	28,724	19.3
Middle-income	80	60.2	96,529	64.8	10,343	10.7	31,989	21.5
Upper-income	10	7.5	11,755	7.9	742	6.3	54,267	36.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>133</b>	<b>100.0</b>	<b>149,026</b>	<b>100.0</b>	<b>19,036</b>	<b>12.8</b>	<b>149,026</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	3,438	734	0.5	21.3	2,135	62.1	569	16.6
Moderate-income	72,304	40,749	25.3	56.4	21,946	30.4	9,609	13.3
Middle-income	157,282	105,861	65.8	67.3	33,892	21.5	17,529	11.1
Upper-income	19,620	13,552	8.4	69.1	3,883	19.8	2,185	11.1
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>252,644</b>	<b>160,896</b>	<b>100.0</b>	<b>63.7</b>	<b>61,856</b>	<b>24.5</b>	<b>29,892</b>	<b>11.8</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	267	1.2	245	1.2	19	1.2	3	0.7
Moderate-income	6,203	27.1	5,602	26.8	478	30.8	123	29.4
Middle-income	14,586	63.7	13,366	63.8	947	60.9	273	65.3
Upper-income	1,851	8.1	1,722	8.2	110	7.1	19	4.5
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>22,907</b>	<b>100.0</b>	<b>20,935</b>	<b>100.0</b>	<b>1,554</b>	<b>100.0</b>	<b>418</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>91.4</b>		<b>6.8</b>		<b>1.8</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	1	0.1	0	0	1	11.1	0	0
Moderate-income	334	18	332	18	2	22.2	0	0
Middle-income	1,399	75.5	1,394	75.6	5	55.6	0	0
Upper-income	120	6.5	119	6.4	1	11.1	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>1,854</b>	<b>100.0</b>	<b>1,845</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>99.5</b>		<b>.5</b>		<b>.0</b>	

2016 FFIEC Census Data and 2015 D&B Information

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

### **Lending Test**

Lending performance in Non-metropolitan Central Ohio is rated “High Satisfactory.” Peoples demonstrated a good responsiveness to the credit needs of the community. In addition, Peoples was a leader in community development lending by making 23 loans totaling \$27.6 million in this assessment area. Peoples had a good geographic distribution of loans and low level of lending gaps. Peoples has a good distribution among borrowers of different income levels, a good distribution to businesses of different revenue sizes, and exhibits an adequate record of serving the credit needs of low-income individuals or businesses with gross annual revenues of \$1 million or less. The extensive use of flexible lending programs augmented Peoples’ performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase, small business, and refinance lending based on overall volume, followed by home improvement lending. There were not enough multi-family or small farm loans to conduct a meaningful analysis. Further, borrower distribution received slightly more consideration than geographic distribution due to a greater percentage of low- and moderate-income families (42.1%) than low- and moderate-income tracts (32.0%).

In addition, Peoples’ lending performance was compared to the 2014 and 2015 aggregate performance of all lenders required to report HMDA and CRA data within the respective assessment areas. Details of Peoples’ residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix D.

### ***Lending Activity***

Lending activity reflects a good responsiveness to the credit needs within the assessment area. For the review period, Peoples originated 1,392 HMDA loans (721 home purchase, 495 refinance, 172 home improvement, and four multi-family) and 641 CRA loans (628 small business and 13 small farm) in this assessment area. This represents 54.1% of Peoples’ total lending and is greater than the percentage of total deposits at 49.2% in this area.

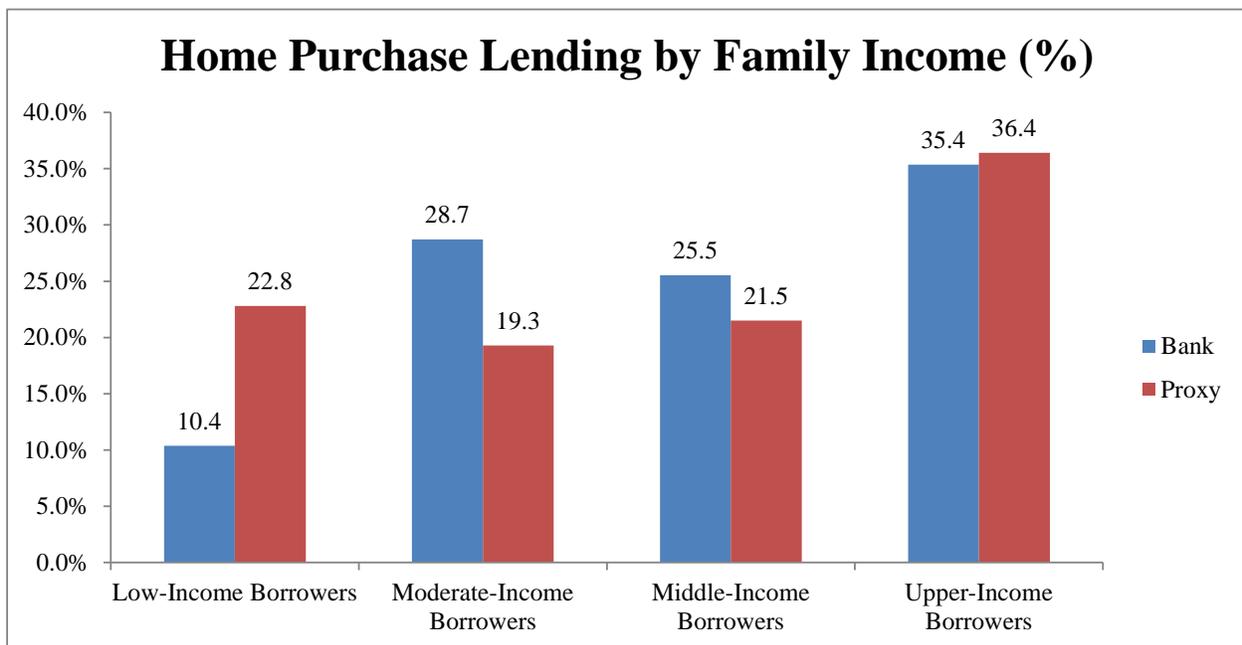
### ***Borrower Distribution of Lending***

The distribution of loans is good based on borrower income and for businesses of different revenue sizes. Borrower distribution is good for all HMDA products and was also good for small businesses with revenues less than or equal to \$1 million.

As mentioned previously, based on the 2015 median family income for the MSA, approximately 47.6% of the homes valued up to \$101,536 in the assessment area would be considered affordable for low-income individuals and 74.5% of the homes valued up to \$162,458 would be considered affordable for moderate-income individuals. Rental and vacant units make up 36.3% of the housing units in the assessment area. Low- and moderate-income families make up 42.1% of the families living in the assessment area, with 12.8% of families below the poverty level. The factors can limit opportunities to originate residential mortgage loans.

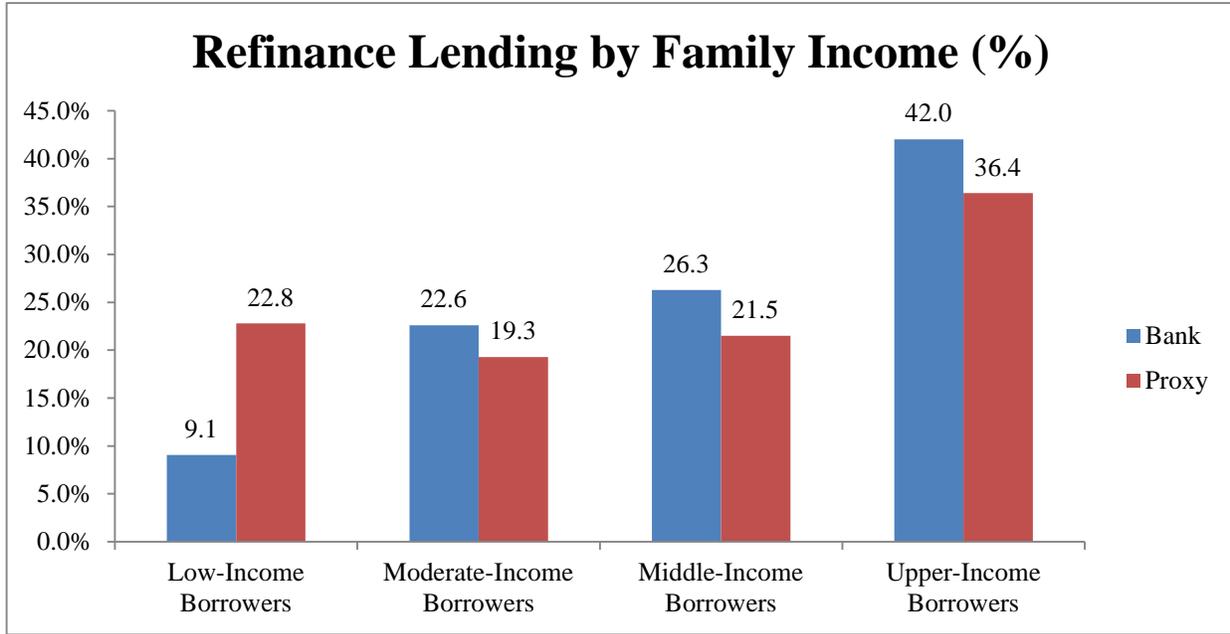
*Home Purchase Lending*

Peoples’ performance was compared to the income levels of families in the assessment area (proxy) that are HMDA reporters. As shown in the chart below, Peoples’ home purchase lending is well below proxy for low-income borrowers. The percentage of families below the poverty level, along with high poverty and high unemployment rates, may have contributed to the weaker performance with low-income borrowers. It should be noted that Peoples outperformed the aggregate for home purchase lending to low-income borrowers. Peoples was slightly above proxy for moderate-income borrowers. Overall, home purchase lending among borrowers of different incomes is good.



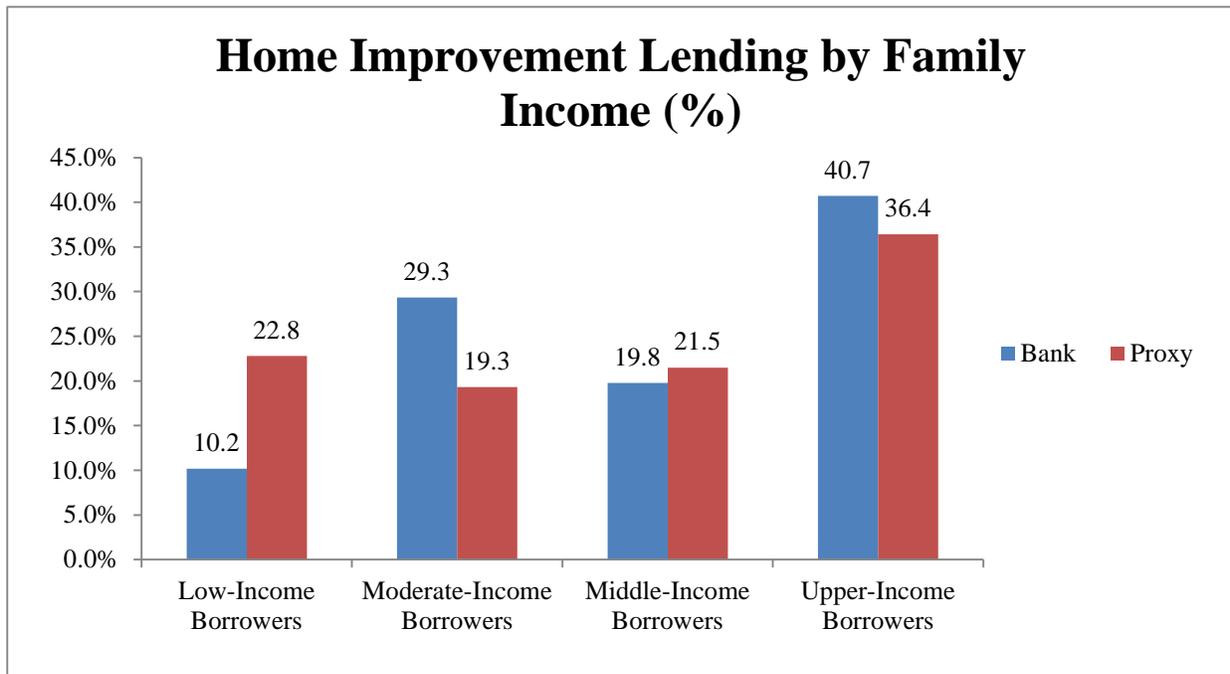
*Refinance Lending*

As shown in the chart below, Peoples’ refinance lending is well below proxy to low-income borrowers and slightly above proxy to moderate-income borrowers. Peoples outperformed the aggregate for refinance lending to low-income borrowers and was comparable to the aggregate for moderate-income borrowers. Overall, refinance lending among borrowers of different incomes is good.



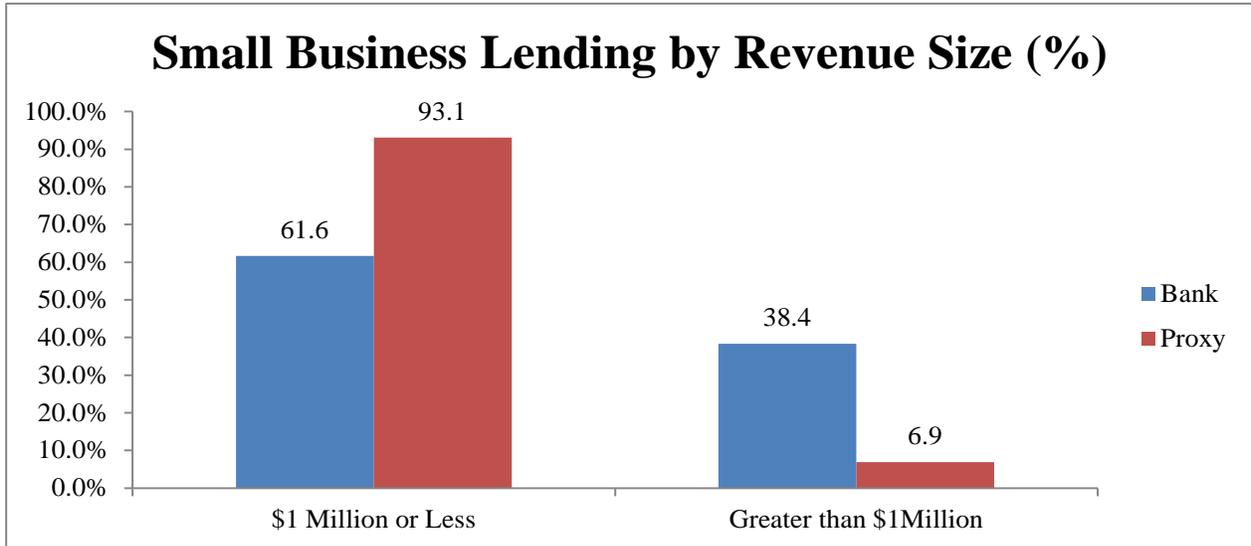
*Home Improvement Lending*

Peoples’ home improvement lending is well below proxy to low-income borrowers. Peoples outperformed the aggregate for home improvement lending to low-income borrowers and was slightly above proxy for moderate-income borrowers. Overall, home improvement lending among borrowers of different incomes is good.

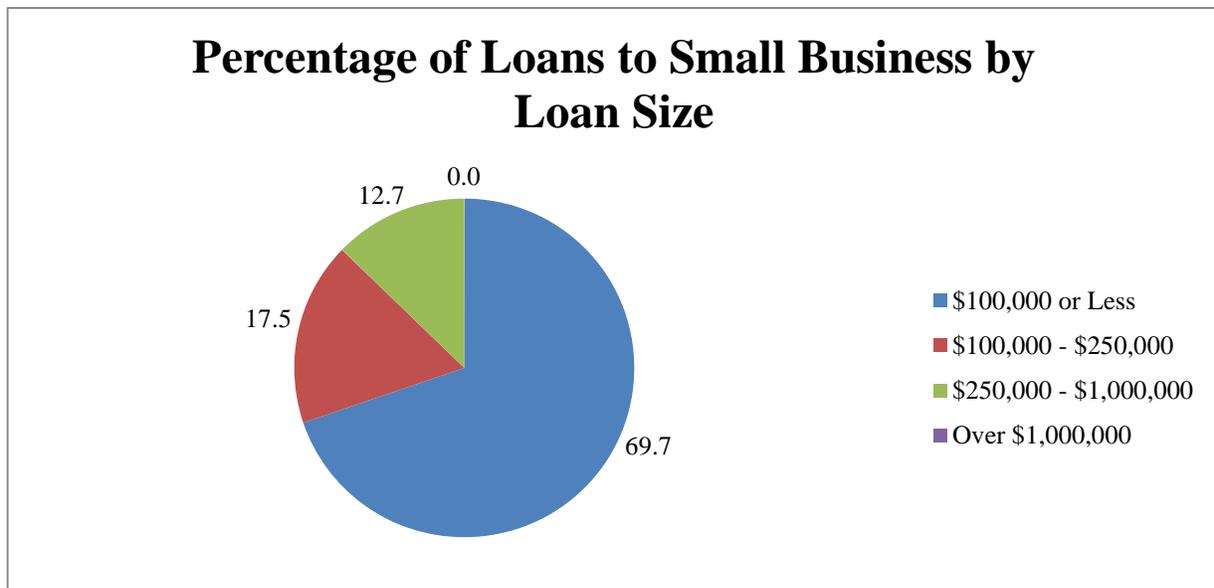


*Small Business Lending*

As depicted in the graph below, Peoples’ lending to businesses with revenue of \$1 million or less is below the percentage of such businesses in the assessment area (proxy). Peoples outperformed aggregate in lending to businesses with revenues of \$1 million or less.



Further analysis of small business lending shows that 69.7% of Peoples’ small business loans were made 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 distribution of loans based on small business lending to businesses based on revenue size is considered good.



***Geographic Distribution of Lending***

Peoples’ overall distribution of lending among geographies is good. All HMDA categories were considered good and performance for small business lending was also good. Further, a low level of lending gaps was identified. The following table shows the lending gaps noted in the assessment area:

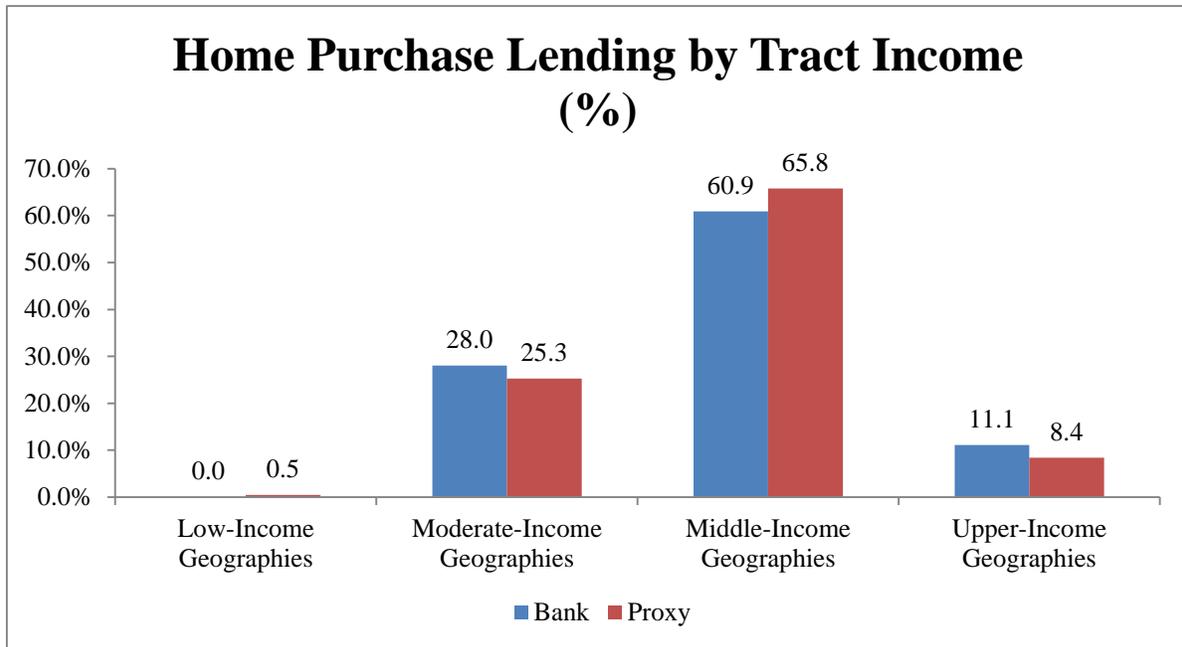
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with No Loans</b>	<b>Penetration</b>
Low	3	1	66.7%
Moderate	40	1	97.5%
Middle	80	0	100.0%
Upper	10	0	100.0%
<b>Total</b>	<b>133</b>	<b>2</b>	<b>98.5%</b>

Peoples made loans in two of three low-income census tracts (66.7%) and 39 of the 40 moderate-income census tracts (97.5%). Ohio University is located in the low-income tract without lending, which could limit lending opportunities in this area. Overall, Peoples made loans in 131 of 133 census tracts (98.5%) in the assessment area, which is considered good.

Housing characteristics of the assessment area based on the 2010 U.S. Census data include the following: 0.7% of families live in low-income tracts, with 1.7% and 0.7% low- and moderate-income, respectively, while 26.6% of families live in moderate-income tracts, with 38.1% and 31.3% low-and moderate-income, respectively. Of the families living below the poverty level, 2.2% are in low-income tracts and 39.6% are in moderate-income tracts. Further, 1.4% of all housing units are in low-income tracts and 28.6% are in moderate-income tracts within the assessment area. Of the units in low-income tracts, only 21.4% are owner-occupied, which is lower than the overall owner-occupancy rate for the assessment area at 63.7%. Further, 62.1% are rental units and 16.6% are vacant. Of the units in moderate-income tracts, 56.4% are owner-occupied, 30.4% are rental, and 13.3% are vacant. The low percentage of families residing in low-income tracts, a low percentage of owner-occupied housing, and high percentage of rental and vacant units could limit lending opportunities for residential mortgage loans in low-income areas.

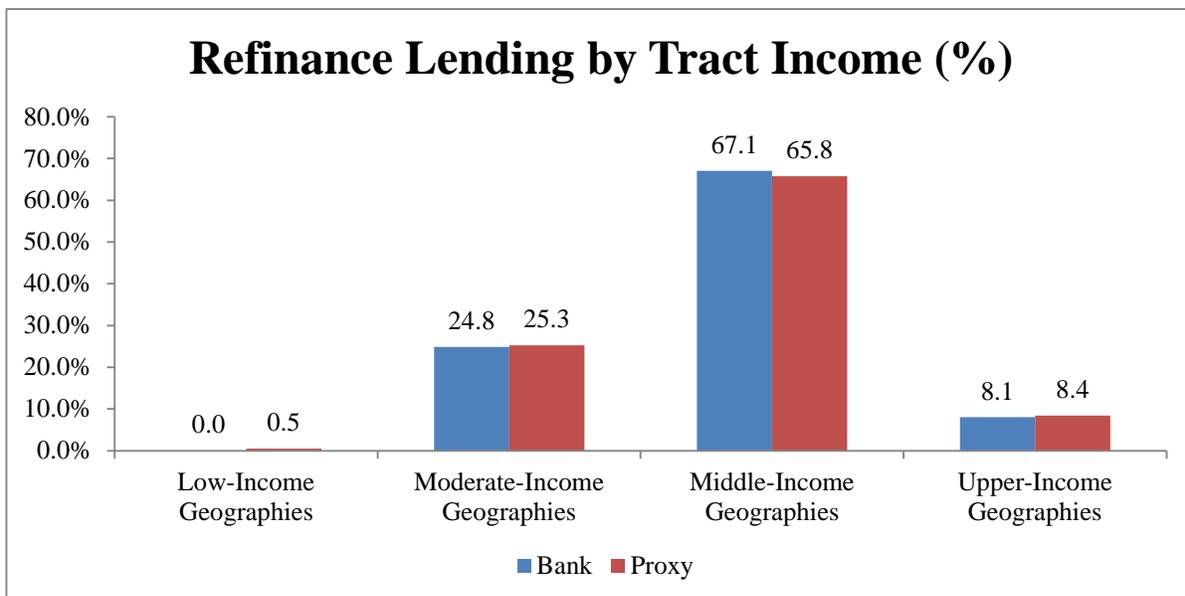
***Home Purchase Lending***

Peoples did not originate any home purchase loans in low-income tracts; aggregate numbers were close to proxy. Low owner-occupancy rates, the presence of a university in low-income tracts, along with high poverty and high unemployment levels may have contributed to the lack of lending in this area. Home purchase lending in moderate-income tracts was slightly above the percentage of owner-occupied units (proxy). The geographic distribution of home purchase loans is considered good.



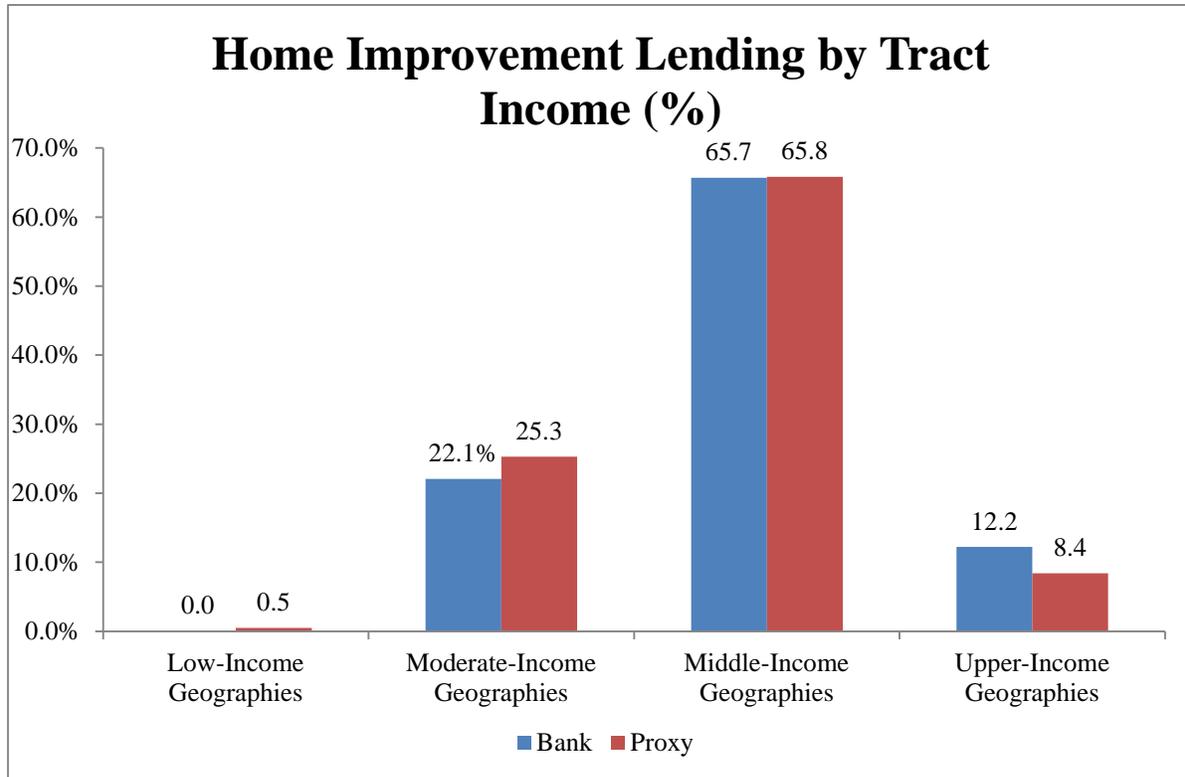
*Refinance Lending*

Peoples did not originate any refinance loans in low-income tracts; aggregate numbers were close to proxy. Low owner-occupancy rates and the presence of a university in low-income tracts, along with high poverty and high unemployment levels, may have contributed to the lack of lending in this area. Refinance lending in moderate-income tracts was slightly below the percentage of owner-occupied units (proxy). The geographic distribution of home purchase loans is considered good.



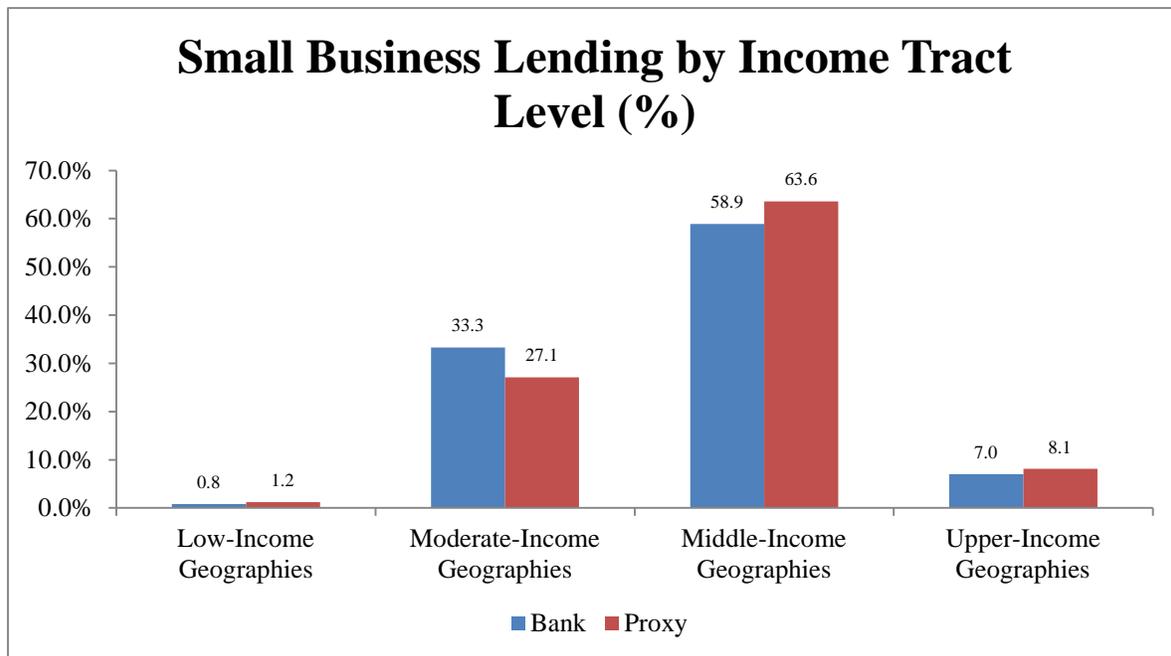
*Home Improvement Lending*

Peoples did not originate any home improvement loans in low-income tracts, as aggregate lending was also below proxy. Home improvement lending in moderate-income tracts was slightly below the percentage of owner-occupied units (proxy). As stated previously, low owner-occupancy rates, the presence of a university in low-income tracts, and high poverty and unemployment levels in the counties with low-income tracts may have contributed to the lack of lending in this area. The geographic distribution of home purchase loans is considered good.



*Small Business Lending*

Small business lending was below the percentage of small businesses located in low- and moderate-income tracts (proxy) and slightly above aggregate. Overall, the geographic distribution of small business lending is good.



***Community Development Loans***

Peoples originated 23 community development loans totaling \$27.6 million. Community development lending in this assessment area represented 41.8% of the total dollar volume of community development loans originated during the evaluation period, while this area represented 49.2% of Peoples’ total deposits. Of the 23 loans made, 18 supported community service, three supported economic development efforts, and two supported the revitalization and stabilization of the low- and moderate-income areas. Overall, Peoples is a leader in making community development loans in this assessment area.

***Flexible Lending Programs***

In addition to traditional bank products, Peoples offers and participates in flexible lending programs such as the Small Business Administration (SBA) loans to small businesses, which are more complex to originate; USDA Rural Housing loans; Section 502 loans primarily used to help low-income borrowers purchase homes in rural areas; Welcome Home Grants that provide grant money (\$5,000 per household) to low- or moderate-income applicants for down payment and closing cost assistance; and the Hardest Hit Fund Program (in Ohio, the program is ‘Save the Dream Ohio;’ in Kentucky, it is ‘Protect my Kentucky Home’), which provides mortgage assistance to unemployed borrowers. In addition, Peoples developed an internal low-income product, ‘Dreams 2 Keys,’ which provides viable lending options specific to low-income borrowers. These types of programs allow Peoples to address the credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented its performance within the assessment area. The following table provides a breakout of the various flexible loan programs offered in this assessment area during the review period, which is considered an extensive use of these programs.

<b>Flexible Lending Program</b>	<b>Total Number of Loans</b>	<b>Total Balance</b>
SBA	5	\$2,240,000
USDA Rural Housing	16	\$1,811,955
Welcome Home Grants	1	\$55,800
Dreams 2 Keys	10	\$744,205
<b>Total</b>	<b>32</b>	<b>\$4,851,960</b>

**Investment Test**

Peoples made eight investments totaling \$958,000 in this assessment area and contributed numerous donations totaling \$193,000. In addition, three prior period investments remain outstanding at the end of the evaluation period with a book value of \$4.8 million. Community development investments and donations for this assessment area represented 41.8% of the total dollar volume of community development and donations originated by Peoples during the evaluation period. This is slightly below the percentage of total deposits of 47.9% for this assessment area and is considered to be an excellent level of qualified community development investments and donations.

Of the new investments, two supported affordable housing, with one GNMA Mortgage Backed Securities purchase for \$607,000 and the other in the amount of \$90,000 supporting development of low-income housing. The third new investment supported community service and was a revenue bond purchase in the amount of \$261,000 to a healthcare organization supporting low- and moderate-income people.

Of the prior period investments, seven supported affordable housing (three mortgage-backed securities totaling \$1.3 million, two low-income housing tax credit investments totaling \$316,000, one new market tax credit totaling \$1.4 million, and one tax-exempt bond for \$814,424 supporting rural housing loans). Two supported community services (one bond totaling \$675,000 supporting the construction of a school that serves low- and moderate-income students and one Port Authority bond in the amount of \$249,000 to a healthcare organization, with funds utilized for revenue funding and facility renovations). In addition, there were 99 donations totaling \$193,000, with the majority supporting community services to low- and moderate-income individuals. The largest donation was for \$31,000 for financial education software used for low- and moderate-income students. The remaining donations were smaller-dollar amounts supporting community services to low- and moderate-income individuals, economic development, and affordable housing (including, but not limited to, replenishing food pantries, financial literacy, and economic development to support for small businesses).

**Service Test**

***Retail Services***

The distribution of bank branches is excellent in Non-metropolitan Central Ohio and are readily accessible to Peoples’ geographies and individuals of different income levels. The percentage of branches in low- and moderate-income geographies exceeded the percentage of families residing in those geographies. During the evaluation period, Peoples closed three bank branches: two in moderate-income tracts and one in a middle-income tract. Considering Peoples’ performance and distribution of branches, there was no significant impact on the accessibility of banking services, particularly in low- and moderate-income geographies and to low- and moderate-income families. Peoples did not open new branches in this assessment area.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or families and are consistent with the services and hours discussed in the Institution assessment.

Peoples had a total of 24 banking centers within this assessment area, including one in low-, 11 in moderate-, 11 in middle-, and one in upper-income census tracts. The banking centers in this assessment area represent 35.1% of all banking centers. Peoples had a total of 30 ATMs (10 full-service and 12 cash-only) including one in low-, 11 in moderate-, 16 in middle- and two in upper-income census tracts. Two branches and ATMs in moderate-income tracts and one branch in a middle-income tract were closed within the review period that did not impact Peoples’ ability to serve moderate-income areas within this assessment area.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts and the percentage of families living in those tracts.

<b>Tract Income Category</b>	<b>Percentage of Banking Centers</b>	<b>Percentage of ATMs</b>	<b>Percentage of Tracts</b>	<b>Percentage of Families in Tracts</b>
Low	4.2%	3.3%	2.3%	0.7%
Moderate	45.8%	36.7%	30.1%	26.6%
Middle	45.8%	53.3%	60.2%	64.8%
Upper	4.2%	6.7%	7.5%	7.9%

The branch/ATM distribution reflects an excellent dispersion within this assessment area.

### *Community Development Services*

Peoples provided a relatively high level of community development services in this assessment area. Management and staff provided community services to 37 different organizations for a total of 2,824 hours. Services provided included financial expertise on boards and financial education. The services provided were as follows:

- Employees served on the board of directors of organizations providing community services to low- and moderate-income individuals.
- Several financial literacy training sessions were provided at schools at which the majority of students received free or reduced-price lunches.
- Employees served on boards and committees to promote economic development and revitalization by developing financial policies to encourage new business downtown and by assisting with the application review process for small businesses seeking funding sources.
- Employees served on boards and committees that promote affordable housing for low- and moderate-income individuals. Employees also provided services related to assisting with application review processes for affordable housing loans and presenting home buying seminars for low- and moderate-income individuals.

**METROPOLITAN AREA**  
*(Full-scope Review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE  
CINCINNATI OH-KY-IN MSA #17140**

The Cincinnati OH-KY-IN Metropolitan Statistical Area (Cincinnati MSA) consists of Brown, Butler, Clermont, Hamilton, and Warren counties in Ohio; Dearborn and Ohio counties in Indiana; and Boone, Bracken, Campbell, Gallatin, Grant, Kenton, Pendleton, and Union counties in Kentucky. Peoples' assessment area only includes Brown, Clermont and Warren counties in Ohio. This MSA is being evaluated as a part of Ohio rather than a separate multi-state assessment area since Peoples does not incorporate the entire multi-state in its assessment area.

This assessment area consists of a total of 82 census tracts comprised of 13 moderate-income census tracts (15.9%), 45 middle-income tracts (54.9%), 23 upper-income tracts (28.0%), and one unknown census tract (1.2%). Peoples has 13 offices in this assessment area, three in moderate-income tracts, nine in middle-income tracts and one in an upper-income tract. All offices in this assessment area opened since the last examination as a result of a merger with National Bank and Trust.

Brown County is located in southwestern Ohio along the Ohio River, with Clermont County to the west. Georgetown Village is the largest city and county seat. The county had a population of 44,846, according to the 2010 U.S. Census.

Clermont County is located in southwestern Ohio along the Ohio River, with Brown County to the east and Warren County to the north. Batavia Village is the largest city and county seat. The county had a population of 197,363, according to the 2010 U.S. Census.

Warren County is located in southwestern Ohio, with Clermont County to the south. Lebanon is the largest city and county seat. The county had a population of 212,693, according to the 2010 U.S. Census.

According to the June 30, 2016 FDIC Deposit Market Share Report, Peoples ranked sixth out of 27 institutions in the market with a deposit share of 6.2% in the assessment area.<sup>14</sup> As shown in the table below, the top four largest institutions were Fifth Third Bank, PNC Bank, LCNB National Bank, and U.S. Bank with 25.1%, 10.8%, 10.0%, and 9.3% of the market share, respectively. Deposits in this assessment area accounted for 13.9% of Peoples' total deposits. This assessment area was the second-largest area in the percentage of deposits within Peoples' CRA footprint.

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<sup>14</sup> <http://www2.fdic.gov/sod/sodMarketBank.asp>

#	Financial Institution	Deposit Market Share
1	Fifth Third Bank	25.1%
2	PNC Bank, National Association	10.8%
3	LCNB National Bank	10.0%
4	U.S. Bank National Association	9.3%
5	JP Morgan Chase Bank, National Association	7.2%
6	Peoples Bank	6.2%

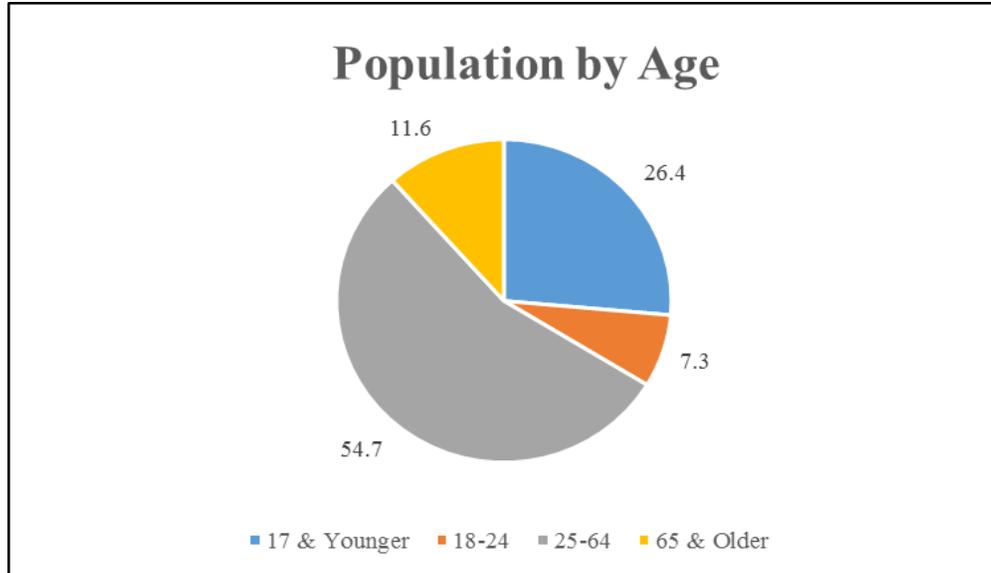
Peoples originated 89 HMDA loans (38 home purchase loans, 40 home refinance loans, and 11 home improvement loans) and 110 CRA loans (80 small business and 30 small farm), which represented 3.7% and 8.2% of the total loans originated during the evaluation period, respectively. This was the fifth-largest HMDA market and third-largest CRA market for loans originated during the evaluation period.

In 2015, Peoples ranked 70<sup>th</sup> among 363 HMDA reporters in the assessment area. The top four HMDA lenders in the assessment area were Union Savings Bank, Wells Fargo Bank, Fifth Third Mortgage Co., and Guardian Savings Bank. Peoples ranked 24<sup>th</sup> of 69 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, US Bank, PNC Bank, and Capital One Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

One community contact interview was conducted to provide additional information regarding the assessment area. The contact represented an organization that promotes economic development by primarily providing funds to businesses with SBA 504 loans in conjunction with a primary local lending institution. Peoples was specifically mentioned as a participating lender and the contact stated that employment has increased through expansion of the local employment base. Economic conditions have recovered over the past five years and continue to grow and expand. Projects are underway in the area to improve area roads, which reduces travel times for residents and workers, as well as housing projects, for which there is a need. The contact stated that lending opportunities are available for financial institutions and stated that all banks are actively involved.

**Population Characteristics**

According to the 2010 U.S. Census, the total population in the assessment area was 454,902. Approximately, 11.3% of the assessment area’s population resides in moderate-income tracts, 52.6% reside in middle-income tracts, 35.1% reside in upper-income tracts, and 1.0% in unknown tracts. As shown in the chart below, 73.6% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 62.0% of the population is between the ages of 18 and 64 and more likely to have credit needs.



The population in the Cincinnati MSA is relatively stable, as depicted in the following table, which shows the population in the assessment area by county for 2010 and 2015,<sup>15</sup> with the percentage of the population increase or decrease.

County	2010 Population	2015 Population	Population Percent Change
Brown	44,846	43,839	-2.2%
Clermont	197,363	201,973	2.3%
Warren	212,693	224,469	5.5%
<b>Total</b>	<b>454,902</b>	<b>470,281</b>	<b>3.4%</b>

Clermont and Warren counties have seen minor increases in population, while Brown County has experienced a slight decrease.

### **Income Characteristics**

According to data from the United States Department of Housing and Urban Development (HUD), the 2010 median family income levels for the assessment area was \$72,013. The MSA-estimated median family income levels increased from 2014 to 2015, but decreased in 2016, as detailed in the following table.<sup>16</sup>

<sup>15</sup> Population data is derived from the U.S. Census Data 2015 Statistical Abstract (enter state, county, town or zip code): [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml#](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#)

<sup>16</sup> <http://www.huduser.org/portal/datasets/il/il13/index.html>

**Borrower Income Levels  
Cincinnati, OH-KY-IN - MSA**

HUD Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2014</b>	<b>\$71,100</b>	0	- \$35,549	\$35,550	- \$56,879	\$56,880	- \$85,319	\$85,320	- & above
<b>2015</b>	<b>\$72,400</b>	0	- \$36,199	\$36,200	- \$57,919	\$57,920	- \$86,879	\$86,880	- & above
<b>2016</b>	<b>\$68,800</b>	0	- \$34,399	\$34,400	- \$55,039	\$55,040	- \$82,559	\$82,560	- & above

The assessment area contains 163,068 households, of which 122,085 (74.9%) are designated as families. Low- and moderate-income families represent 17.1% and 16.7% of all families in this assessment area, respectively. Additionally, 6.1% of families live below the poverty level, compared to 10.3% for Ohio.

Based on data from the U.S. Census Bureau’s Small Area Income and Poverty Estimates (SAIPE),<sup>17</sup> household poverty rates for the county in the assessment area was as follows:

County	2014 Poverty Rate	2015 Poverty Rate	Change
Brown	15.0%	14.9%	-0.7%
Clermont	11.2%	9.5%	-17.9%
Warren	5.8%	5.2%	-11.5%
<b>Ohio</b>	<b>15.8%</b>	<b>14.8%</b>	<b>-6.8%</b>
<b>United States</b>	<b>15.5%</b>	<b>14.7%</b>	<b>-5.4%</b>

Poverty rates for this assessment area decreased from 2014 to 2015, with Clermont and Warren counties experiencing the largest decrease. In 2015, Brown County had the highest poverty rate, higher than Clermont and Warren counties, the state, and nation.

**Labor, Employment and Economic Characteristics**

The following table identifies the primary employment sectors by number of employees and major employers in this assessment area, according to the Ohio Development Services Agency:<sup>18</sup>

17 U.S. Department of Commerce: <https://www.census.gov/programs-surveys/saibe.html>

18 Ohio County Profiles, Ohio Development Services Agency:  
[https://development.ohio.gov/reports/reports\\_countytrends\\_map.htm](https://development.ohio.gov/reports/reports_countytrends_map.htm)

County	Primary Employment Sectors	Major Employers
Brown	Trade, Transportation and Utilities; Local Government; Education and Health Services; Leisure and Hospitality; Manufacturing	Eastern Local Schools; Milacron LLC; Ohio Valley Manor; RULH Local Schools; Southern State Community College; Surgical Appliance Industries; Western Brown Local Schools
Clermont	Trade, Transportation and Utilities; Leisure and Hospitality; Local Government; Education and Health Services; Manufacturing	American Modern Insurance Group; Clermont County Government, Duke Energy Corp; International Paper Co; L-3 Fuzing; Mercy Health Partners; Milacron LLC; Milford Exempted Village Schools; Siemens PLM Software; Tata Consultancy Services Limited; Total Quality Logistics; West Clermont Local Schools
Warren	Trade, Transportation and Utilities; Leisure and Hospitality; Professional and Business Services; Manufacturing; Education and Health Services	Aisin Seiki/ADVICS Co Ltd; Atrium Medical Center; Cedar Fair/Kings Island; Cengage Learning Inc; Cintas Corp; Kraft Heins/Portion Pac Inc; L-3 Cincinnati Electronics; Luxottica Group SpA; Macy's Inc; Mason Local Schools; Procter & Gamble Co; State of Ohio; WellPoint INC/Anthem

The following table illustrates the average annual unemployment rates for 2014, 2015, and 2016 for the Cincinnati MSA, the state and the nation.

**Unemployment Rates  
Peoples Bank, Marietta, OH: Cincinnati, OH-KY-IN - MSA**

Area	Years - Annualized		
	2014	2015	2016
Brown OH	6.6	6.1	5.4 (P)
Clermont OH	4.5	4.2	4.1 (P)
Warren OH	4.2	3.9	3.9 (P)
<b>Cincinnati, OH-KY-IN MSA</b>	<b>4.5</b>	<b>4.3</b>	<b>4.0 (P)</b>
<b>Ohio</b>	<b>4.9</b>	<b>4.6</b>	<b>4.7 (P)</b>
<b>National</b>	<b>5.4</b>	<b>4.8</b>	<b>4.5</b>

Not Seasonally Adjusted, Data Extracted on February 7, 2017

P: Preliminary

Unemployment rates in all counties have remained stable or declined over the three-year period; however, Brown is the only county with unemployment rates above the state and nation.

**Housing Characteristics**

Based on the 2010 U.S. Census there are 177,633 housing units and 122,085 families in this assessment area. From an income perspective, 12.6% of housing units, 53.4% of owner-occupied units, and 11.2% of families are located in moderate-income tracts. Of the families living in moderate-income tracts, 22.9% are low-income and 15.2% are moderate-income. Just under half (46.7%) of the housing units are rental or vacant in moderate-income tracts. The higher number of rental and vacant units compared to the number of families in these tracts suggests there may be a limited opportunities for mortgage credit in moderate-income geographies.

The median age of housing stock was 26 years, according to the 2010 U.S. Census, with 10.9% of housing built prior to 1950. Within the assessment area, the median age of housing stock was 36 years in moderate-income tracts. Housing stock in moderate-income tracts is aging and may likely require repairs and rehabilitation. The aging housing stock could represent opportunities for Peoples to provide home improvement and rehabilitation loans in moderate-income areas.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$172,373 with an affordability ratio of 36.1%. 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 Cincinnati MSA (\$68,800), approximately 27.9% of the homes valued up to \$126,096 in the assessment area would be considered affordable for low-income individuals and 70.7% of the homes valued up to \$201,753 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.

The table below shows the median home values and associated appreciation over the prior year for the assessment area. This information obtained from Sperling’s Best Places.<sup>19</sup>

<b>County</b>	<b>Median Home Values</b>	<b>Appreciation (over prior year)</b>
Brown	\$129,600	-8.2%
Clermont	\$148,300	-7.2%
Warren	\$191,100	-8.4%

The median gross rent in the assessment area was \$771 with 6.0% of the rental units having rents of less than \$350 a month, according to the 2010 U.S. Census. The majority of rents (55.0%) in this assessment area were greater than \$700 per month, while 10.3% of rents were \$350 to-\$499 and 23.2% of rents were \$500 to \$699 per month. Approximately 19.6% of all housing units in the assessment area are rental units. Additionally, 40.5% of renters have rent costs greater than 30.0% of their income.

According to Realtytrac,<sup>20</sup> an online database that tracks and provides foreclosure statistics, all counties in this assessment area had foreclosure rates greater than the state and nation. The following table shows the foreclosure filings in the assessment area, state, and nation.

<sup>19</sup> Sperling’s Best Places, [www.bestplaces.net](http://www.bestplaces.net)

<sup>20</sup> [www.realtytrac.net](http://www.realtytrac.net)

<b>County</b>	<b>Ratio of Properties Receiving Foreclosure Filings in January 2017</b>
Brown	1:927
Clermont	1:1,083
Warren	1:1,281
<b>Ohio</b>	<b>1:1,285</b>
<b>United States</b>	<b>1:1,594</b>

The following table illustrates the demographics in the Cincinnati OH MSA.

## Combined Demographics Report

Assessment Area(s): Cincinnati 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	20,810	17
Moderate-income	13	15.9	13,681	11.2	2,383	17.4	20,395	16.7
Middle-income	45	54.9	65,392	53.6	4,147	6.3	26,773	21.9
Upper-income	23	28	43,004	35.2	877	2	54,107	44.3
Unknown-income	1	1.2	8	0	8	100	0	0
<b>Total Assessment Area</b>	<b>82</b>	<b>100.0</b>	<b>122,085</b>	<b>100.0</b>	<b>7,415</b>	<b>6.1</b>	<b>122,085</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	22,444	11,979	9.3	53.4	7,770	34.6	2,695	12
Middle-income	97,943	69,296	54	70.8	19,907	20.3	8,740	8.9
Upper-income	57,216	46,950	36.6	82.1	7,136	12.5	3,130	5.5
Unknown-income	30	0	0	0	30	100	0	0
<b>Total Assessment Area</b>	<b>177,633</b>	<b>128,225</b>	<b>100.0</b>	<b>72.2</b>	<b>34,843</b>	<b>19.6</b>	<b>14,565</b>	<b>8.2</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	2,008	11	1,800	10.6	194	16.2	14	12.8
Middle-income	9,420	51.4	8,797	51.7	547	45.7	76	69.7
Upper-income	6,889	37.6	6,414	37.7	456	38.1	19	17.4
Unknown-income	3	0	3	0	0	0	0	0
<b>Total Assessment Area</b>	<b>18,320</b>	<b>100.0</b>	<b>17,014</b>	<b>100.0</b>	<b>1,197</b>	<b>100.0</b>	<b>109</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>92.9</b>		<b>6.5</b>		<b>.6</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	72	10.8	72	10.9	0	0	0	0
Middle-income	486	73.2	484	73.2	2	66.7	0	0
Upper-income	106	16	105	15.9	1	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>664</b>	<b>100.0</b>	<b>661</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>99.5</b>		<b>.5</b>		<b>.0</b>	

2016 FFIEC Census Data and 2015 D&B Information

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CINCINNATI OH-KY-IN MSA #17140**

### **Lending Test**

Lending performance in the Cincinnati MSA is rated “High Satisfactory.” Although Peoples is relatively new to this market, it demonstrated a good responsiveness to the credit needs of the community. In addition, Peoples made a relatively high level of community development loans; one such community development loan totaled \$9.2 million. Peoples had an excellent geographic distribution of loans. Although there was a significant number of lending gaps, Peoples has an excellent distribution among borrowers of different income levels and a good distribution to businesses of different revenue sizes. Further, Peoples exhibits a good record of serving the credit needs of low-income individuals and businesses with gross annual revenues of \$1 million or less. Peoples made use of flexible lending programs, which augmented its performance in this assessment area.

Greatest consideration was given to the evaluation of HMDA lending based on overall volume, followed by small business lending. There were not enough loans within each HMDA product to conduct an analysis for each product; as such, HMDA loans were reviewed as a whole. In addition, there were not enough small farm loans to conduct a meaningful analysis. Further, borrower distribution received greater consideration, as there were a greater percentage of low- and moderate-income individuals (33.8%) than moderate-income tracts (15.9%).

Peoples lending performance was compared to the 2014 and 2015 aggregate performance of all lenders required to report HMDA and CRA data within the respective assessment areas. Details of Peoples’ residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix D.

### ***Lending Activity***

Lending activity reflects a good responsiveness to the credit needs within the assessment area. Peoples originated 89 HMDA loans (38 home purchase, 40 refinance, and 11 home improvement) and 110 CRA loans (80 small business and 30 small farm) in this assessment area. This represents 5.3% of Peoples total lending, which is less than the percentage of total deposits at 13.9% in this area. Peoples entered this market in March 2015 in its acquisition of National Bank and Trust, which could explain the lower lending levels in this area. It would be expected that lending improves as time elapses.

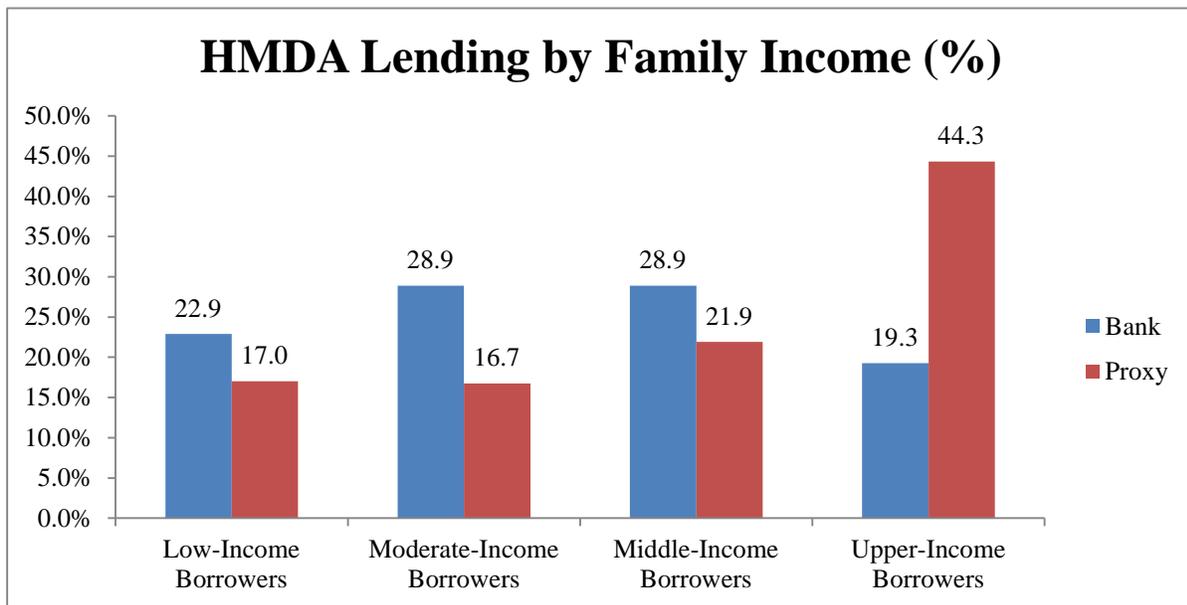
### ***Borrower Distribution of Lending***

The distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for HMDA products and was good for small businesses with revenues less than or equal to \$1 million.

As mentioned previously, based on the 2015 median family income for the MSA, approximately 27.9% of the homes valued up to \$126,096 in the assessment area would be considered affordable for low-income individuals and 70.7% of the homes valued up to \$201,753 would be considered affordable for moderate-income individuals. Rental and vacant units make up 27.8% of the housing units in the assessment area. Low- and moderate-income families make up 33.8% of the families living in assessment area, with 6.1% of families below the poverty level. These factors may limit opportunities to originate residential mortgage loans.

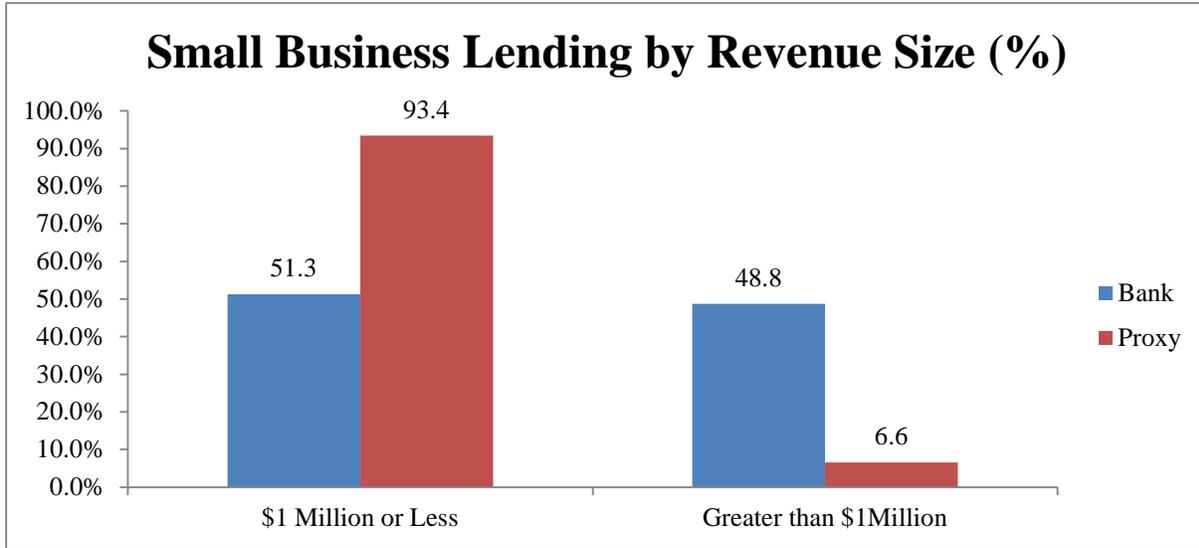
*HMDA Lending*

Peoples’ performance was compared to the income levels of families in the assessment area (proxy) that are HMDA reporters. As shown in the chart below, Peoples’ HMDA lending is above proxy for low-income borrowers and well above proxy for moderate-income borrowers. Overall, HMDA lending among borrowers of different incomes is excellent.

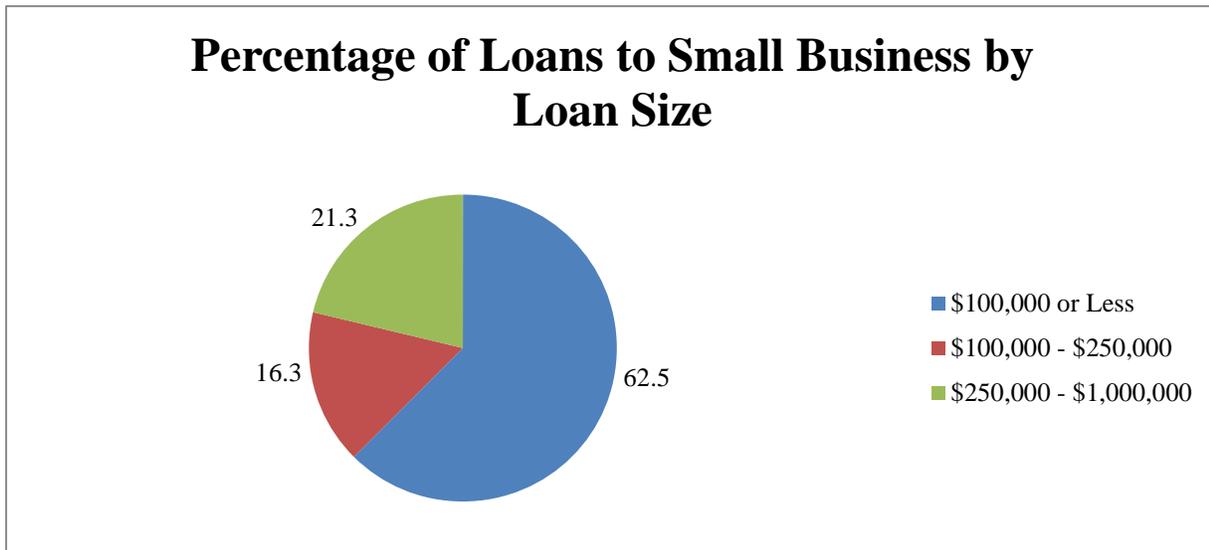


*Small Business Lending*

As depicted in the following graph, Peoples’ lending to businesses with revenue of \$1 million or less is below the percentage of such businesses in the assessment area (proxy). Peoples was comparable to aggregate in lending to businesses with revenues of \$1 million or less.



Further analysis of small business lending shows that 62.5% of Peoples’ small business loans were made 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 distribution of loans based on small business lending to businesses based on revenue size is considered good.



***Geographic Distribution of Lending***

Peoples’ overall distribution of lending among geographies is excellent. HMDA lending performance was considered excellent and good for small business lending. Further, significant levels of lending gaps were identified. The following table shows the lending gaps noted in the assessment area:

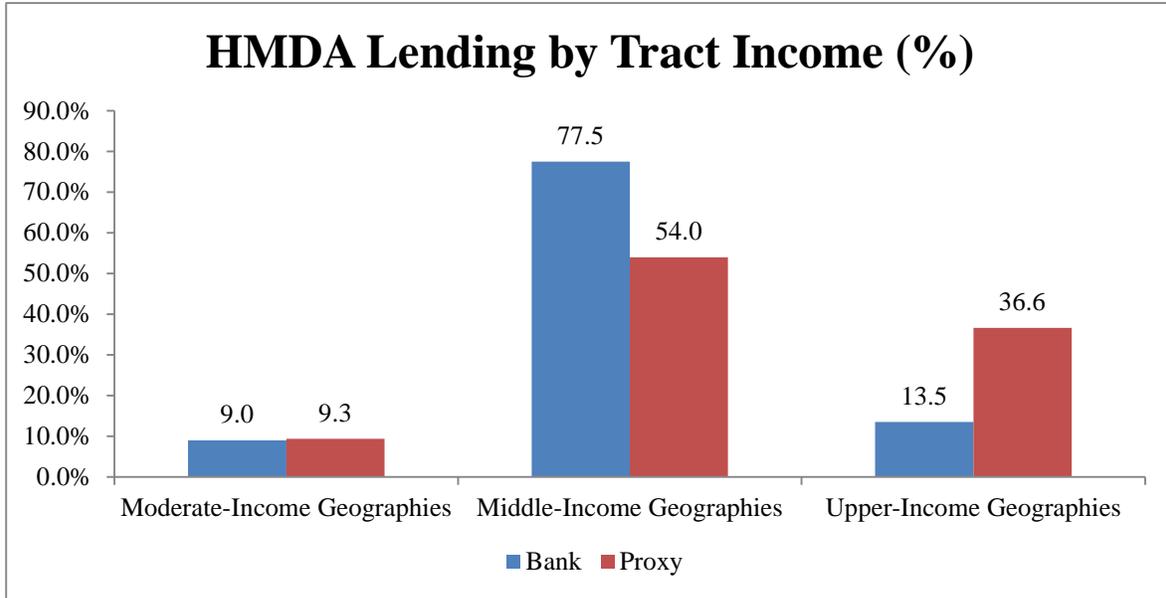
Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	0	na	na
Moderate	13	6	53.8%
Middle	45	16	64.4%
Upper	23	11	52.2%
Unknown	1	1	0.0%
<b>Total</b>	<b>82</b>	<b>34</b>	<b>58.5%</b>

Peoples made loans in seven of the 13 moderate-income census tracts (53.8%), 29 of the 45 middle-income census tracts (64.4%), and 12 of the 23 upper-income census tracts. As previously mentioned, Peoples is new to the Cincinnati market, which could further explain lending gaps. It is expected that lending improves as time elapses. Overall, Peoples originated loans in 48 of 82 census tracts (58.2%) in the assessment area, which is considered adequate.

Based on the 2010 U.S. Census data, housing characteristics of the assessment area include the following: 11.2% of families reside in moderate-income tracts, while families living below the poverty level make up 32.1% of moderate-income tracts. Further, 12.6% of all housing units are in moderate-income tracts within the assessment area. Of the units in moderate-income tracts, 53.4% are owner-occupied, which was lower than the overall owner-occupancy rate for the assessment area (72.2%), 34.6% are rental, and 12.0% are vacant. The low percentage of families residing in low-income tracts, along with a lower percentage of owner-occupied housing and higher percentage of rental and vacant units, could limit lending opportunities for residential mortgage loans.

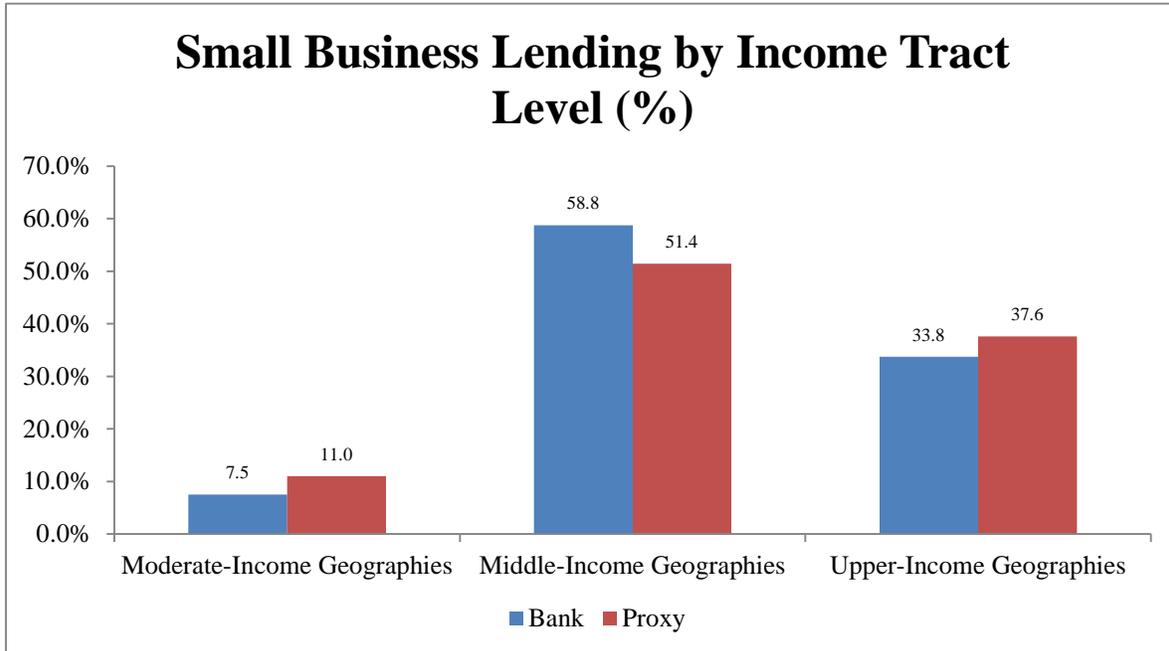
*Home Purchase Lending*

Peoples’ HMDA lending was slightly below the percentage of owner-occupied units (proxy) in moderate-income tracts. The geographic distribution of HMDA loans is considered excellent.



*Small Business Lending*

Small business lending was below the percentage of small businesses located in moderate-income tracts (proxy) and slightly below the aggregate for 2015. Overall, the geographic distribution of small business lending is good.



***Community Development Loans***

Peoples originated one community development loan totaling \$9.2 million. Community development lending in this assessment area represented 13.9% of the total dollar volume of community development loans originated by Peoples during the evaluation period, while this area represented 13.9% of the bank’s total deposits. Loan proceeds will be used to construct a new warehouse in a moderate-income tract that will retain and create jobs in the area. Overall, Peoples makes a relatively high level of community development loans in this assessment area.

***Flexible Lending Programs***

In addition to traditional bank products, Peoples offers and participates in flexible lending programs such as the Small Business Administration (SBA) loans to small businesses, which are more complex to originate; USDA Rural Housing loans; Section 502 loans primarily used to help low-income borrowers purchase homes in rural areas; Welcome Home Grants that provide grant money (\$5,000 per household) to low- or moderate-income applicants for down payment and closing cost assistance; and the Hardest Hit Fund Program (in Ohio, the program is ‘Save the Dream Ohio;’ in Kentucky, it is ‘Protect my Kentucky Home’), which provides mortgage assistance to unemployed borrowers. In addition, Peoples developed an internal low-income product, ‘Dreams 2 Keys,’ which provides viable lending options specific to low-income borrowers. These types of programs allow Peoples to address the credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented its performance within the assessment area. As shown in the table below, Peoples made use of flexible loan programs in this assessment area during the evaluation period.

<b>Flexible Lending Program</b>	<b>Total Number of Loans</b>	<b>Total Balance</b>
SBA	6	\$2,508,600
Welcome Home Grants	3	\$211,463
Dreams 2 Keys	4	\$271,600
<b>Total</b>	<b>13</b>	<b>\$2,991,663</b>

**Investment Test**

Peoples made two investments totaling \$707,000 in this assessment area and contributed numerous donations totaling \$34,000. Of the two new investments, one was a mortgage-backed securities investment totaling \$680,000 and one was an investment for the development of low-income housing totaling \$27,000. In addition, one prior period investment remains outstanding at the end of the evaluation period with a book value of \$245,000. This is a tax-exempt bond supporting rural housing loans and programs to increase affordable housing opportunities. Donations represented \$34,000 and were smaller dollar amounts supporting community service activities, s funding financial education software, replenishing food pantries, and financial literacy

Investments and donations for this assessment area represented 6.9% of the total dollar volume of community development and donations originated by Peoples. Overall, Peoples has an excellent level of qualified community development investments and donations.

**Service Test**

***Retail Services***

The distribution of branches is excellent in the Cincinnati MSA and are readily accessible. The percentage of branches in both moderate-income geographies exceeded the percentage of families residing in those geographies. Peoples entered this market during the evaluation period acquiring 14 branches: three in moderate-, 10 in middle-, and one in upper-income tracts. Peoples closed one branch in a middle-income tract. The closure of this branch did not impact Peoples’ ability to serve the credit needs in the area, in particular moderate-income areas.

Business hours and services provided do not vary in a way that inconveniences low- and moderate-income geographies or families and are consistent with the services and hours discussed in the institutional assessment.

Peoples had a total of 13 banking centers within this assessment area, including three in moderate-, nine in middle- and one in upper-income census tracts. The banking centers in this assessment area represent 17.6% of all of Peoples’ banking centers. Peoples had a total of 12 full-service ATMs, including three in moderate-, eight in middle- and one in upper-income census tracts. All banking centers opened since the last examination as a result of a merger with National Bank and Trust. During the review period, one branch was closed in a middle-income tract. This closure did not impact Peoples’ ability to serve low- or moderate- income areas. The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts and the percentage of families living in those tracts.

<b>Tract Income Category</b>	<b>Percentage of Banking Centers</b>	<b>Percentage of ATMs</b>	<b>Percentage of Tracts</b>	<b>Percentage of Families in Tracts</b>
Low	NA	NA	NA	NA
Moderate	23.08%	25.00%	15.85%	11.21%
Middle	69.23%	66.67%	54.88%	53.56%
Upper	7.69%	8.33%	28.05%	35.22%

The branch/ATM distribution reflects an excellent dispersion within this assessment area.

***Community Development Services***

Peoples provided an adequate level of community development services in this assessment area. Two members of management served on the board and committees of three different organizations, two of which provide community services and one that promotes economic development, for a total of 399 hours.

**METROPOLITAN AREA**  
**(Full-scope Review)**

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE**  
**COLUMBUS OH MSA #18140**

The Columbus OH Metropolitan Statistical Area (Columbus MSA) consists of Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway, and Union counties. Peoples' assessment only includes the entireties of Fairfield, Hocking, Licking and Perry counties. This assessment area consists of a total of 73 census tracts comprised of one low-income census tract (1.4%), 26 moderate-income census tracts (35.6%), 32 middle-income tracts (43.8%), and 14 upper-income tracts (19.2%). Peoples has five offices in this assessment area, three in moderate-income tracts and two in middle-income tracts and also operates a loan production office in a middle-income tract.

Fairfield County is located in central Ohio, with Hocking County to the south, Perry County to the east and Licking County to the north. Lancaster is the largest city and county seat. The county had a population of 146,156, according to the 2010 U.S. Census.

Hocking County is located in south central Ohio, with Fairfield and Perry counties to the north. Logan is the largest city and county seat. The county had a population of 29,380, according to the 2010 U.S. Census.

Licking County is located in central Ohio, with Fairfield and Perry counties to the south. Newark is the largest city and county seat. The county had a population of 166,492, according to the 2010 U.S. Census.

Perry County is located in central Ohio, with Hocking County to the south, Fairfield County to the west, and Licking County to the north. New Lexington is the largest city and county seat. The county had a population of 13,554, according to the 2010 U.S. Census.

According to the June 30, 2016 FDIC Deposit Market Share Report, Peoples ranked 14<sup>th</sup> out of 25 institutions in the market with a deposit share of 1.5% in the assessment area.<sup>21</sup> As shown in the table below, the top four largest institutions were The Park National Bank, JP Morgan Chase, PNC Bank, and Huntington National Bank with 38.0%, 9.4%, 8.0%, and 7.4% of the market share, respectively. Deposits in this assessment area accounted for 3.1% of Peoples' total deposits. This assessment area was the ninth-largest percentage of deposits within Peoples' CRA footprint.

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

#	Financial Institution	Deposit Market Share
1	The Park National Bank	38.0%
2	JP Morgan Chase Bank, National Association	9.4%
3	PNC Bank, National Association	8.0%
4	The Huntington National Bank	7.4%
5	The Vinton County National Bank	6.3%
6	Fairfield Federal Savings and Loan Association of Lancaster	4.3%
7	Fifth Third Bank	4.2%
8	The Citizens Bank of Logan, Ohio	2.8%
9	First Federal Savings and Loan Association	2.7%
10	Heartland Bank	2.6%
11	U.S. Bank National Association	2.4%
12	The Peoples National Bank of New Lexington	1.9%
13	Standing Stone Bank	1.7%
14	Peoples Bank	1.5%

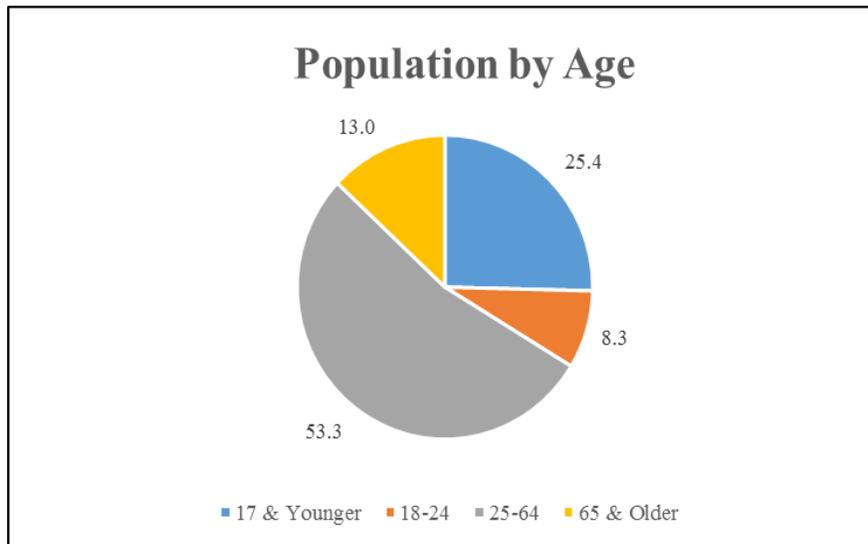
Peoples originated 149 HMDA loans (90 home purchase loans, 44 home refinance loans, 14 home improvement loans, and one multi-family loan) and 158 CRA loans (156 small business and two small farm), which represented 6.2% and 11.7% of the total loans originated during the evaluation period, respectively. This was the third-largest HMDA market and second-largest CRA market for loans originated during the evaluation period.

In 2015, Peoples ranked 42<sup>nd</sup> among 329 HMDA reporters in the assessment area. The top four HMDA lenders in the assessment area were Park National Bank, Wells Fargo Bank, Huntington National Bank, and Union Savings Bank. Peoples ranked 16<sup>th</sup> of 58 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were US Bank, Park National Bank, American Express, and PNC Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

One community contact interview was conducted to provide additional information regarding the assessment area. The contact, representing a non-profit, community-based organization focused on revitalizing low-income, underserved neighborhoods in the greater Columbus area stated that financial institutions in the area are open to making potential investments to the organization. The contact stated there are opportunities for financial institutions to receive CRA credit and provide tax credit financing to support various community development initiatives.

### **Population Characteristics**

According to the 2010 U.S. Census, the total population in the assessment area was 378,086. Approximately, 0.9% of the assessment area's population resides in low-income tracts and 30.5% resides in moderate-income tracts, while 45.4% reside in middle-income tracts and 23.1% in upper-income tracts. As shown in the chart below, 74.6% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 61.6% of the population is between the ages of 18 and 64 and more likely to have credit needs.



As depicted in the following table, the population in the Columbus MSA is relatively stable and shows the population in the assessment area by county for 2010 and 2015,<sup>22</sup> with the percentage of the population increase or decrease.

County	2010 Population	2015 Population	Population Percent Change
Fairfield	146,156	151,408	3.5%
Hocking	29,380	28,491	-3.1%
Licking	166,492	170,570	2.4%
Perry	36,058	35,985	-0.2%
<b>Total</b>	<b>378,086</b>	<b>386,454</b>	<b>2.2%</b>

Fairfield and Licking counties displayed minor increases in population, while Hocking County indicated a slight decrease.

### **Income Characteristics**

According to data from the United States Department of Housing and Urban Development (HUD), the 2010 median family income levels for the assessment area was \$61,586. The MSA-estimated median family income levels increased from 2014 to 2015, but decreased in 2016, as detailed in the following table.<sup>23</sup>

22 Population data is derived from the U.S. Census Data 2015 Statistical Abstract (enter state, county, town or zip code): [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml#](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#)

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

**Borrower Income Levels  
Columbus, OH - MSA**

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2014</b>	<b>\$69,400</b>	0 - \$34,699	\$34,700 - \$55,519	\$55,520 - \$83,279	\$83,280 - & above
<b>2015</b>	<b>\$71,000</b>	0 - \$35,499	\$35,500 - \$56,799	\$56,800 - \$85,199	\$85,200 - & above
<b>2016</b>	<b>\$69,100</b>	0 - \$34,549	\$34,550 - \$55,279	\$55,280 - \$82,919	\$82,920 - & above

The assessment area contains 141,520 households, of which 102,295 (72.3%) are designated as families. Low- and moderate-income families represent 0.8% and 29.9% of all families in this assessment area, respectively. Additionally, 8.8% of families live below the poverty level, compared to Ohio at 10.3%.

Based on data from the U.S. Census Bureau’s Small Area Income and Poverty Estimates (SAIPE)<sup>24</sup>, household poverty rates for the county in the assessment area are as follows:

County	2014 Poverty Rate	2015 Poverty Rate	Change
Fairfield	9.6%	9.1%	-5.2%
Hocking	17.5%	15.7%	-10.3%
Licking	13.5%	12.6%	-6.7%
Perry	17.8%	18.8%	5.6%
<b>Ohio</b>	<b>15.8%</b>	<b>14.8%</b>	<b>-6.8%</b>
<b>United States</b>	<b>15.5%</b>	<b>14.7%</b>	<b>-5.4%</b>

All counties, with the exception of Fairfield and Licking have poverty rates that exceeded the state and nation. The areas with relatively high poverty rates may be an indication that individuals, especially those that are low- or moderate-income, may have difficulty in having sufficient financial resources to obtain loans.

**Labor, Employment and Economic Characteristics**

The following table identifies the primary employment sectors by number of employees and major employers in this assessment area, according to the Ohio Development Services Agency:<sup>25</sup>

24 U.S. Department of Commerce: <https://www.census.gov/programs-surveys/saipe.html>

25 Ohio County Profiles, Ohio Development Services Agency:  
[https://development.ohio.gov/reports/reports\\_countytrends\\_map.htm](https://development.ohio.gov/reports/reports_countytrends_map.htm)

County	Primary Employment Sectors	Major Employers
Fairfield	Trade, Transportation and Utilities; Education and Health Services; Leisure and Hospitality; Local Government; Professional and Business Services	Cyril-Scott Co.; Oneida Group/Anchor Hocking; Fairfield County; Fairfield Medical Center; Glasfloss Industries; Kroger Co.; Lancaster City Schools; McDermott International/Diamond Power; Nifco America; Pickerington Local Schools; Ralcorp/Ralston Foods; State of Ohio; Worthington Cylinder Corp
Hocking	Local Government; Leisure and Hospitality; Trade, Transportation and Utilities; Manufacturing; Education and Health Services	Amanda Bent Bolt Co.; General Electric Co.; Gabriel Logan; Hocking Valley Community Hospital; Logan Health Care Center; Kilbarger Construction; Kroger Co.; Logan-Hocking Local Schools; Smead Manufacturing Co.; State of Ohio; Wal-Mart Stores Inc.
Licking	Trade, Transportation and Utilities; Education and Health Services; Manufacturing; Local Government; Leisure and Hospitality; Local Government	Anomatic Corp.; Boeing Co.; Denison University; Licking County Government; Licking Heights Local Schools; Licking Memorial Health Systems; Newark City Schools; Owens-Corning; Park National Bank; State Farm Mutual Automobile Ins. Co.
Perry	Local Government; Trade, Transportation and Utilities; Education and Health Services; Manufacturing; Leisure and Hospitality	Westmoreland Coal; CerCo LLC; Cooper-Standard Automotive; Crooksville Exempted Village Schools; Eclipse Aluminum Trailer, LLC; Ludowici Roof Tile; New Lexington City Schools; Northern Local Schools; PCC Airfoils LLC; Perry County Government; Shelly Materials Inc.; Southern Local Schools

The following table illustrates the average annual unemployment rates for 2014, 2015, and 2016 for the Columbus MSA, the state, and nation.

**Unemployment Rates**  
**Peoples Bank, Marietta, OH: Columbus, OH - MSA**

County	Years - Annualized		
	2014	2015	2016
Fairfield	4.3	4.1	4.0 (P)
Hocking	5.5	5.8	5.4 (P)
Licking	4.3	4.1	4.0 (P)
Madison	4.0	3.7	3.7 (P)
<b>Columbus, OH MSA</b>	<b>4.1</b>	<b>3.9</b>	<b>3.9 (P)</b>
<b>Ohio</b>	<b>4.9</b>	<b>4.6</b>	<b>4.7 (P)</b>
<b>National</b>	<b>5.4</b>	<b>4.8</b>	<b>4.5</b>

Not Seasonally Adjusted, Data Extracted on February 7 and March 30, 2017

P: Preliminary

Unemployment rates in all counties have declined over the three-year period and three of the four counties are below the state and national rates. Hocking County's unemployment rate was above Ohio and nation. The higher percentage of unemployment rates in this area may indicate that individuals, especially those that are low- or moderate-income, may have difficulty in having sufficient financial resources to obtain loans.

**Housing Characteristics**

Based on the 2010 U.S. Census, there are 154,587 housing units and 102,295 families in this assessment area. From an income perspective, 1.1% of housing units, 39.7% of owner-occupied units, and 0.8% of families are located in low-income tracts and 33.1% of housing units, 58.1% of owner-occupied units, and 29.9% of families are located in moderate-income tracts. Over half of the housing units in the low-moderate-income census tracts are either rental or vacant (60.3%), while just under half are rental or vacant in moderate-income tracts (41.9%).

The higher number of rental and vacant units compared to the number of families in these tracts suggests there is a limited opportunity for mortgage credit in low- and moderate-income geographies.

The median age of housing stock was 36 years, according to the 2010 U.S. Census, with 23.4% of housing built prior to 1950. Within the assessment area, the median age of housing stock was 61 years in low-income tracts and 50 in moderate-income tracts. Older homes are typically more likely to require repairs and rehabilitation; therefore, this assessment areas aging housing stock could represent opportunities for Peoples to provide home improvement and rehabilitation loans in low- or moderate-income areas.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$80,484 with an affordability ratio of 34.2%. 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 the Columbus MSA (\$69,100), approximately 37.1% of the homes valued up to \$126,645 in the assessment area would be considered affordable for low-income individuals and 75.9% of the homes valued up to \$202,633 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.

The table below shows the median home values and associated appreciation over the prior year for the assessment area. This information obtained from Sperling’s Best Places.<sup>26</sup>

<b>County</b>	<b>Median Home Values</b>	<b>Appreciation (over prior year)</b>
Fairfield	1:967	1:968
Hocking	1:5,180	1:5,181
Licking	1:2,747	1:2,748
Perry	1:1,014	1:1,015

According to the 2010 U.S. Census, the median gross rent in the assessment area was \$682, with 9.6% of the rental units having rents of less than \$350 a month. The majority of rents (43.9%) in this assessment area were greater than \$700 per month, while 11.7% of rents were \$350 to \$499 and 27.9% of rents were \$500 to \$699 per month. Approximately 22.9% of all housing units in the assessment area are rental units. Additionally, 45.1% of renters have rent costs greater than 42.9% of their income.

According to Realtytrac,<sup>27</sup> an online database that tracks and provides foreclosure statistics, Fairfield and Perry counties had foreclosure rates greater than the state and nation. The following table shows the foreclosure filings in the assessment area, state and nation.

<sup>26</sup> Sperling’s Best Places, [www.bestplaces.net](http://www.bestplaces.net)

<sup>27</sup> [www.realtytrac.net](http://www.realtytrac.net)

<b>County</b>	<b>Ratio of Properties Receiving Foreclosure Filings in (January 2017)</b>
Fairfield	1:967
Hocking	1:5,180
Licking	1:2,747
Perry	1:1,014
<b>Ohio</b>	<b>1:1,285</b>
<b>United States</b>	<b>1:1,594</b>

The following table illustrates the demographics in the Columbus MSA.

## Combined Demographics Report

Assessment Area(s): Columbus MSA 2016

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.4	791	0.8	232	29.3	21,821	21.3
Moderate-income	26	35.6	30,588	29.9	4,373	14.3	19,875	19.4
Middle-income	32	43.8	47,005	46	3,671	7.8	23,308	22.8
Upper-income	14	19.2	23,911	23.4	767	3.2	37,291	36.5
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>73</b>	<b>100.0</b>	<b>102,295</b>	<b>100.0</b>	<b>9,043</b>	<b>8.8</b>	<b>102,295</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	1,744	692	0.7	39.7	862	49.4	190	10.9
Moderate-income	51,188	29,752	28	58.1	15,752	30.8	5,684	11.1
Middle-income	70,172	49,405	46.6	70.4	15,227	21.7	5,540	7.9
Upper-income	31,483	26,238	24.7	83.3	3,592	11.4	1,653	5.3
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>154,587</b>	<b>106,087</b>	<b>100.0</b>	<b>68.6</b>	<b>35,433</b>	<b>22.9</b>	<b>13,067</b>	<b>8.5</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	340	2.2	302	2.1	33	4.1	5	2.9
Moderate-income	4,269	27.4	3,949	27.1	255	31.4	65	37.4
Middle-income	6,905	44.4	6,439	44.2	378	46.6	88	50.6
Upper-income	4,052	26	3,890	26.7	146	18	16	9.2
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>15,566</b>	<b>100.0</b>	<b>14,580</b>	<b>100.0</b>	<b>812</b>	<b>100.0</b>	<b>174</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>93.7</b>		<b>5.2</b>		<b>1.1</b>	
	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	185	21.7	184	21.6	1	33.3	0	0
Middle-income	570	66.8	568	66.8	2	66.7	0	0
Upper-income	98	11.5	98	11.5	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>853</b>	<b>100.0</b>	<b>850</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>99.6</b>		<b>.4</b>		<b>.0</b>	

2016 FFIEC Census Data and 2015 D&B Information

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBUS OH MSA #18140**

### **Lending Test**

Lending performance in the Columbus MSA is rated “High Satisfactory.” Peoples demonstrated a good responsiveness to the credit needs of the community. In addition, Peoples makes a relatively higher level of community development loans. Five loans were made totaling \$4.2 million in this assessment area. Peoples had an excellent geographic distribution of loans and limited gaps in lending were identified. Peoples has an excellent distribution among borrowers of different income levels and a good distribution to businesses of different revenue sizes. Peoples exhibits a good record of serving the credit needs of low-income individuals and businesses with gross annual revenues of \$1 million or less. Peoples made extensive use of flexible lending programs, which augmented its performance in this assessment area.

Greatest consideration was given to the evaluation of small business lending based on overall volume, followed by home purchase and refinance lending. There were not enough home improvement, multi-family, or small farm loans to conduct a meaningful analysis. Further, geographic distribution received equal consideration to borrower distribution based on the level of low- and moderate-income tracts (37.0%) and the percentage of low-and moderate-income families (40.7%) in the assessment area.

Peoples’ lending performance was compared to the 2014 and 2015 aggregate performance of all lenders required to report HMDA and CRA data within the respective assessment areas. Details of Peoples’ residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix D.

### ***Lending Activity***

Lending activity reflects a good responsiveness to the credit needs within the assessment area. Peoples originated 149 HMDA loans (90 home purchase, 44 refinance, 14 home improvement, and one multi-family) and 158 CRA loans (156 small business and two small farm). This represents 8.2% of Peoples total lending, which is greater than the percentage of total deposits at 3.1% in this area.

### ***Borrower Distribution of Lending***

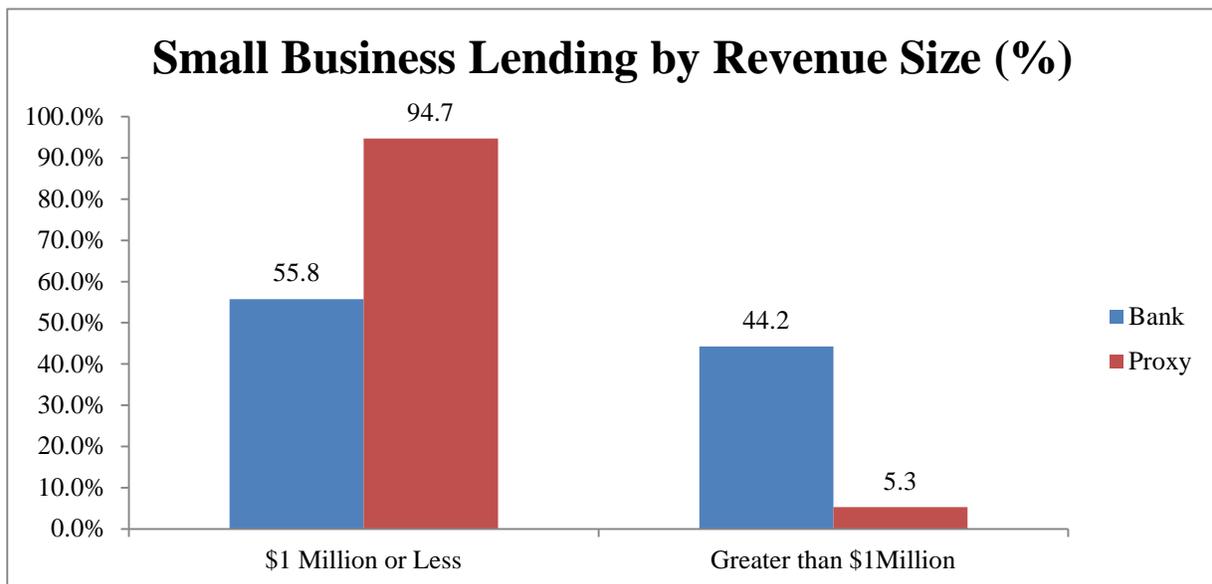
The distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for home purchase and good for refinance lending and lending to small businesses with revenues less than or equal to \$1 million.

As mentioned previously, based on the 2016 median family income for the MSA, approximately 37.1% of the homes valued up to \$126,645 in the assessment area would be considered affordable for low-income individuals and 75.9% of the homes valued up to \$202,633 would be considered affordable for moderate-income individuals.

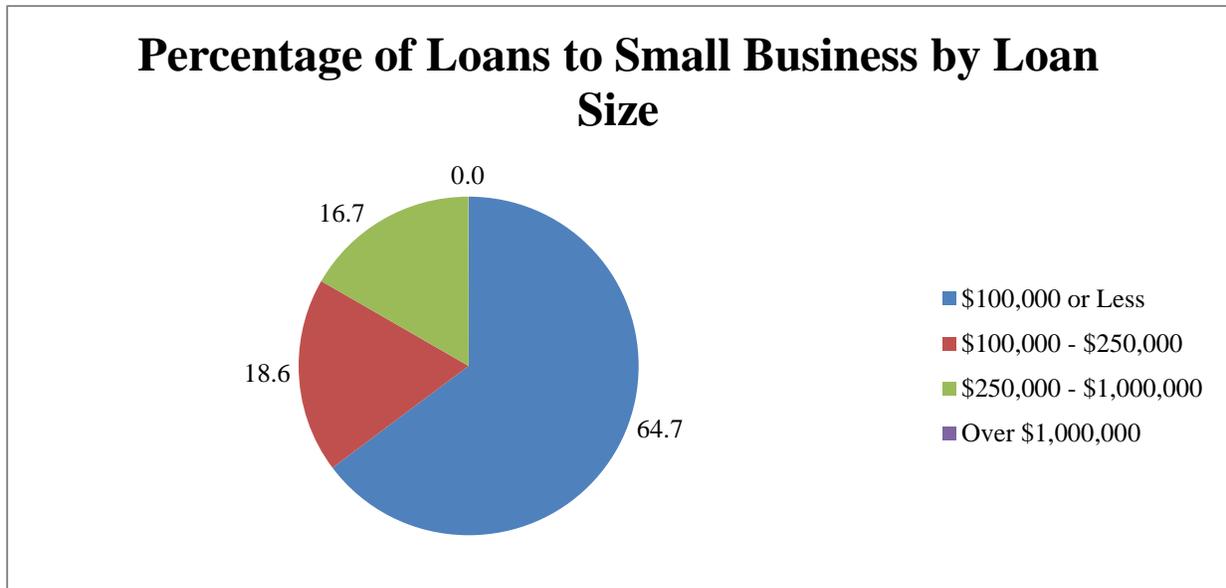
Rental and vacant units make up 41.4% of the housing units in the assessment area. Low- and moderate-income families make up 40.8% of the families living in assessment area, with 8.8% of families below the poverty level. These factors can limit opportunities to originate residential mortgage loans.

### *Small Business Lending*

As depicted in the graph below, Peoples' lending to businesses with revenue of \$1 million or less is below the percentage of such businesses in the assessment area (proxy). Peoples was comparable to the aggregate in lending to businesses with revenues of \$1 million or less.

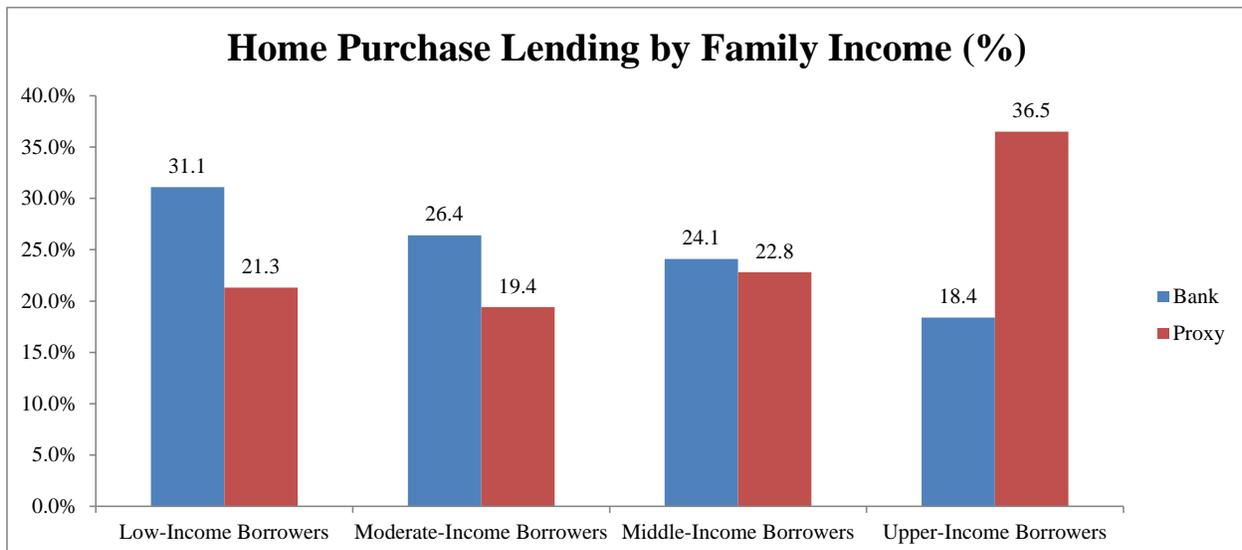


Further analysis of small business lending shows that 64.7% of Peoples' small business loans were made for \$100,000 or less. Typically, the extent to which a bank is willing to extend loans in amounts of \$100,000 or less is reviewed because smaller businesses often have a greater need for small-dollar loans. The distribution of loans based on small business lending to businesses based on revenue size is considered good.



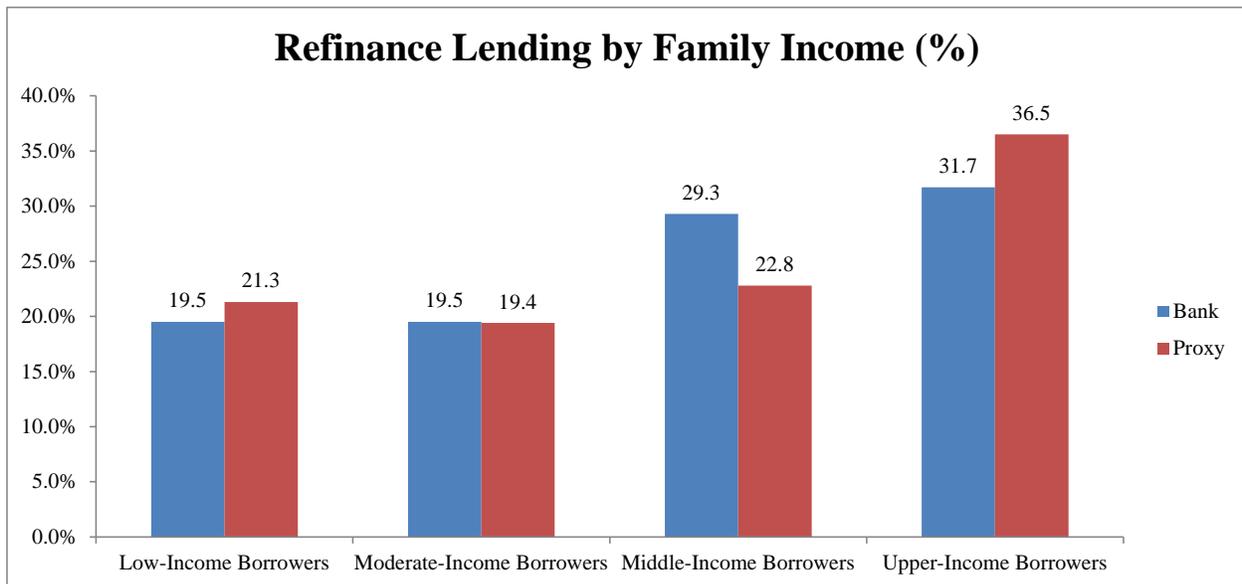
#### *Home Purchase Lending*

Peoples' performance was compared to the income levels of families in the assessment area (proxy) that are HMDA reporters. As shown in the chart below, Peoples' home purchase lending was above proxy for both low- and moderate-income borrowers. Overall, home purchase lending among borrowers of different incomes is excellent.



#### *Refinance Lending*

As shown in the chart below, Peoples refinance lending was slightly below proxy for low-income borrowers, but was above the aggregate. Refinance lending for moderate-income borrowers was comparable to proxy, but below the aggregate. Overall, refinance lending among borrowers of different incomes is excellent.



***Geographic Distribution of Lending***

Peoples’ overall distribution of lending among geographies is excellent. Small business loans are considered excellent, while performance for home purchase lending was excellent and refinance lending was considered good. A limited levels of lending gaps were identified, as shown in the following table:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	1	0	100%
Moderate	26	3	88.5%
Middle	32	2	93.8%
Upper	14	4	71.4%
<b>Total</b>	<b>73</b>	<b>9</b>	<b>87.7%</b>

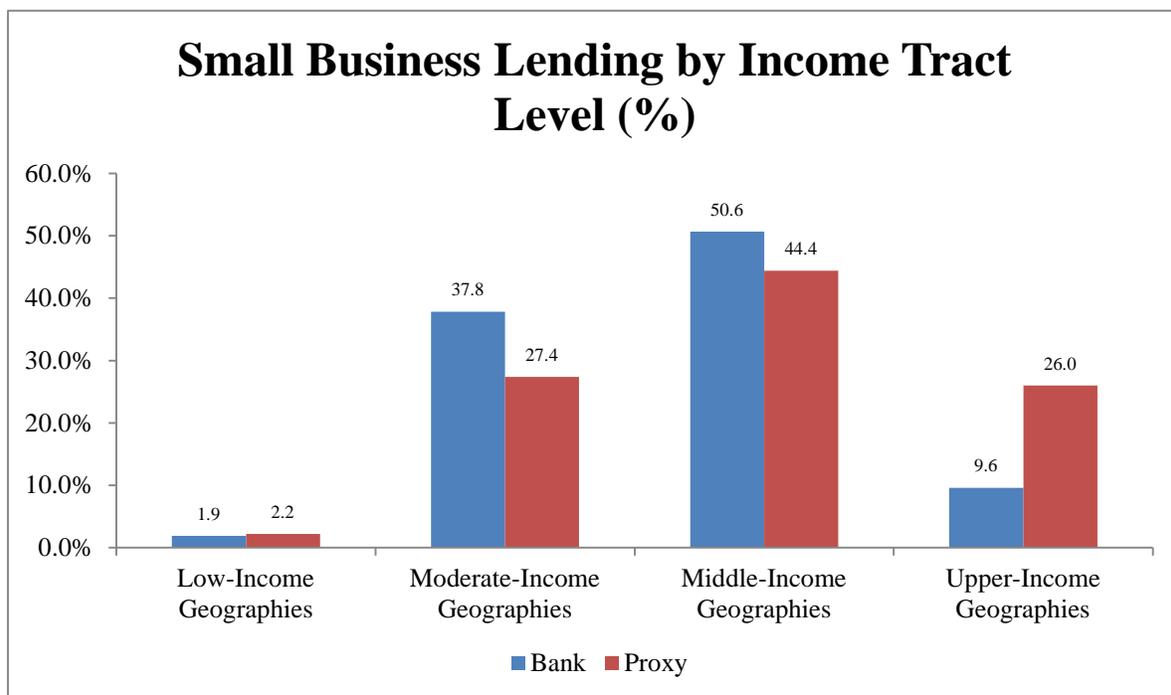
Peoples made loans in all low-income census tracts, 23 of the 26 moderate-income census tracts (88.5%), 30 of the 32 middle-income census tracts (93.8%), and 10 of the 14 upper-income census tracts (71.4%). Overall, Peoples made loans in 64 of 73 census tracts (87.7%) in the assessment area, which is considered good.

Based on 2010 U.S. Census data, housing characteristics and assessment area show there is only one low-income tract in this assessment area with 0.8% of families, while 29.9% of families reside in moderate-income tracts. Families living below the poverty level make up 2.6% of low- and 48.4% of moderate-income tracts.

Further, 1.1% of all housing units are in low-income tracts and 33.1% are in moderate-income tracts. Of these units, 39.7% in low- and 58.1% in moderate-income tracts are owner-occupied, which was lower than the overall owner-occupancy rate for the assessment area (68.6%). In addition, 60.3% are rental and vacant in low- and 41.9% are rental or vacant in moderate-income tracts. The low percentage of families residing in low-income tracts, a lower percentage of owner-occupied housing, and higher percentage of rental and vacant units could limit lending opportunities for residential mortgage loans.

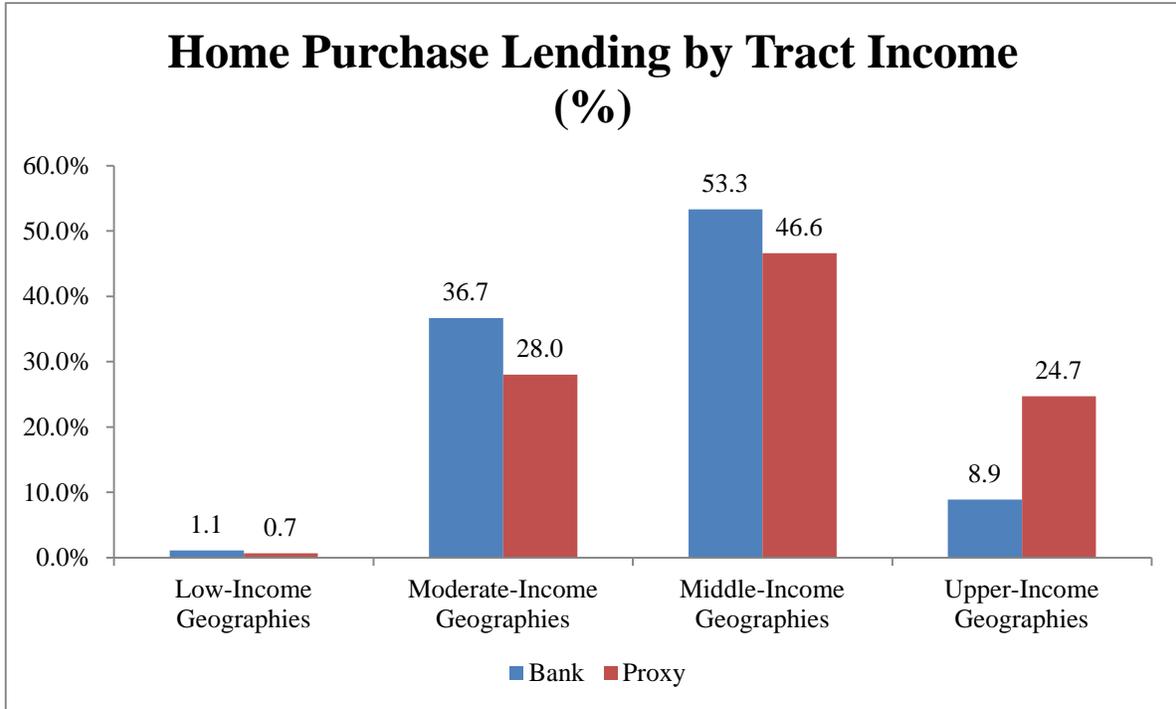
*Small Business Lending*

Small business lending was slightly below the percentage of small businesses located in low-income tracts and above proxy in moderate-income tracts. Overall, the geographic distribution of small business lending is excellent.



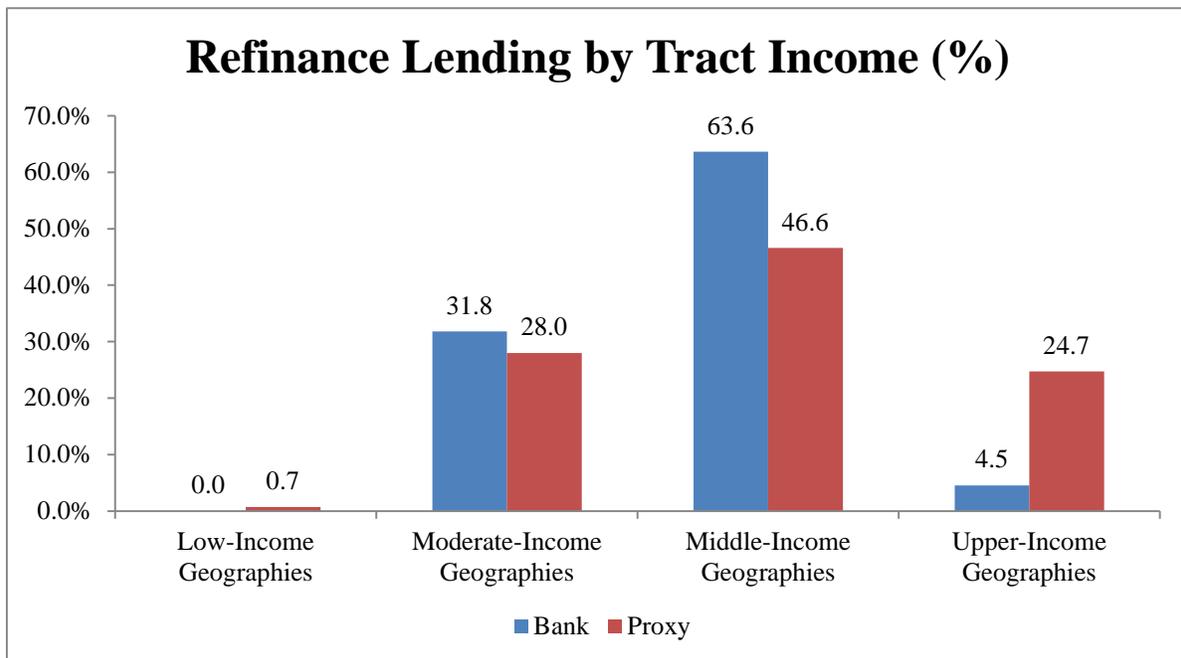
*Home Purchase Lending*

Peoples' home purchase lending was well above the percentage of owner occupied units (proxy) in low-income tracts and above proxy in moderate-income tracts. The geographic distribution of home purchase loans is considered excellent.



#### Refinance Lending

Peoples did not originate any refinance loans in low-income tracts. The aggregate outperformed Peoples, but were below proxy in low-income tracts. The lack of owner-occupied units in low-income tracts and low percentage of families could impact refinance lending in low-income tracts. Refinance lending in moderate-income tracts was above proxy for the bank. The geographic distribution for refinance loans is considered good.



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

Peoples originated five community development loans totaling \$4.2 million. Community development lending in this assessment area represented 6.4% of the total dollar volume of community development loans originated by Peoples and represented 3.1% of its total deposits. Of the five loans made, two supported affordable housing, one supported community service, one supported economic development efforts, and one supported the revitalization and stabilization of low- and moderate income areas. Overall, Peoples makes a relatively high level of community development loans in this assessment area.

### ***Flexible Lending Programs***

In addition to traditional bank products, Peoples offers and participates in flexible lending programs such as the Small Business Administration (SBA) loans to small businesses, which are more complex to originate; USDA Rural Housing loans; Section 502 loans primarily used to help low-income borrowers purchase homes in rural areas; Welcome Home Grants that provide grant money (\$5,000 per household) to low- or moderate-income applicants for down payment and closing cost assistance; and the Hardest Hit Fund Program (in Ohio, the program is ‘Save the Dream Ohio;’ in Kentucky, it is ‘Protect my Kentucky Home’), which provides mortgage assistance to unemployed borrowers. In addition, Peoples developed an internal low-income product, ‘Dreams 2 Keys,’ which provides viable lending options specific to low-income borrowers. These types of programs allow Peoples to address the credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented its performance within the assessment area. As shown in the table below, Peoples made use of flexible loan programs in this assessment area during the evaluation period.

<b>Flexible Lending Program</b>	<b>Total Number of Loans</b>	<b>Total Balance</b>
SBA	3	\$2,370,000
USDA Rural Housing	5	\$452,775
Welcome Home Grants	5	\$362,952
Save the Dream Ohio	2	\$174,574
Dreams 2 Keys	19	\$1,612,635
<b>Total</b>	<b>34</b>	<b>\$4,972,936</b>

### **Investment Test**

Peoples made one investment totaling \$6,000 and contributed 17 donations totaling \$31,000. The new investment was for the development of low-income housing. In addition, four prior period investments remain outstanding at the end of the evaluation period, with a book value of \$865,000. Of these, two were mortgage-backed securities totaling \$796,000, one was a tax-exempt bond in the amount of \$58,000 supporting rural housing loans and programs to increase affordable housing opportunities, and one was a low-income housing tax credit in the amount of \$11,000. The donations of \$31,000 supported community services, including replenishing food pantries and programs that serve low- and moderate-income individuals.

Community development investments and donations for this assessment area represented 6.3% of the total dollar volume of community development and donations originated by Peoples, which is above the percentage of total deposits of 3.1% for this assessment area. Overall, Peoples exhibits an excellent level of qualified community development investments and donations.

**Service Test**

***Retail Services***

The distribution of branches is adequate in the Columbus MSA and is reasonably accessible. Peoples does not have any branches in low-income tracts. There is one low-income census tract and the percentage of families in this tract is 0.8%. In addition, Peoples was able to originate loans within this tract. The percentage of branches in moderate-income geographies exceeded the percentage of families residing in those geographies. Peoples did not open or close any branches in this assessment area during the evaluation period.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or families and are consistent with the services and hours discussed in the institutional assessment.

Peoples have a total of five banking centers, including three in moderate- and two in middle-income census tracts. The banking centers in this assessment area represent 6.8% of all of Peoples’ banking centers overall. Peoples had a total of five full-service ATMs, including three in moderate- and two in middle-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts and the percentage of families living in those tracts.

<b>Tract Income Category</b>	<b>Percentage of Banking Centers</b>	<b>Percentage of ATMs</b>	<b>Percentage of Tracts</b>	<b>Percentage of Families in Tracts</b>
Low	0.0%	0.0%	1.4%	0.8%
Moderate	60.0%	60.0%	35.6%	29.9%
Middle	40.0%	40.0%	43.8%	46.0%
Upper	0.0%	0.0%	19.2%	23.4%

The branch/ATM distribution reflects an adequate dispersion within this assessment area.

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

Peoples provided an adequate level of community development services in this assessment area. Seven members of the board, management, and staff served on the board committees of five different organizations (three organizations providing community services to low- or moderate-income individuals and two promoting economic development) and provided community service to three different organizations in the form of financial literacy for a total of 897 hours.

**METROPOLITAN AREA**  
*(Limited-scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN OHIO**

- Non-metropolitan Southeastern Ohio
  - As of February 27, 2017, Peoples operated seven branches in the assessment area, representing 12.3% of its branches in Ohio.
  - As of June 30, 2016, Peoples had \$249,321 in deposits in this assessment area, representing a market share of 8.4% and 4.4% of its statewide deposits.
- Akron OH MSA #10420
  - As of February 27, 2017, Peoples operated four branches in the assessment area, representing 7.0% of its branches in Ohio.
  - As of June 30, 2016, Peoples had \$94,511 in deposits in this assessment area, representing a market share of 0.8% and 4.4% of its statewide deposits.
- Cleveland-Elyria OH MSA #17460
  - As of February 27, 2017, Peoples operated one branch in the assessment area, representing 1.8% of its branches in Ohio
  - As of June 30, 2016, Peoples had \$105,471 in deposits in this assessment area, representing a market share of 0.2% and 4.9% of its statewide deposits.
- Dayton OH MSA #19380
  - As of June 30, 2016, Peoples operated one branches in the assessment area, representing 1.8% of its branches in Ohio.
  - As of June 30, 2016, Peoples had \$8,619 in deposits in this assessment area, representing a market share of 0.1% and 0.4% of its statewide deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

Through the use of available facts and data, including performance and demographic information, each assessment area’s performance was evaluated and compared with Peoples performance in the state. The conclusions regarding performance are provided in the tables below. Please refer to the tables in Appendix D for information regarding these areas.

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-metropolitan Southeastern Ohio	Below	Consistent	Below
Akron OH MSA	Consistent	Consistent	Below
Cleveland-Elyria OH MSA	Below	Consistent	Consistent
Dayton OH MSA	Below	Below	Below

For the lending test, Peoples received a “High Satisfactory” rating in Ohio. Performance in the Akron MSA limited-scope area was consistent with Peoples’ performance for the state. Lending levels were good for geographic distribution of loans and borrower distribution of loans in this area. Performance in the remaining three limited-scope assessment areas was below Peoples’ performance for the state. Although below the state performance, the geographic distribution of loans was adequate in Non-metropolitan Southeastern Ohio and the Cleveland and Dayton MSAs.

The borrower distribution of loans was good in the Akron and Dayton MSAs and Non-metropolitan Southeastern Ohio and adequate in the Cleveland MSA. The borrower distribution of loans to businesses with revenues equal to or less than \$1 million was excellent in Non-metropolitan Southeastern Ohio, good in the Akron and Dayton MSAs, and adequate in the Cleveland MSA.

The Akron and Cleveland MSAs had a high level of community development loans, while the Dayton MSA and Non-metropolitan Southeastern Ohio area had few loans. While lending gaps were identified in the limited-scope areas, Peoples is relatively new to these markets. Overall, gaps in lending could also be attributed to lower owner-occupancy rates, a lower percentage of families, a higher percentage of families below the poverty level, and a higher percentage of rental and vacant units, especially in low- and moderate-income areas. It is expected that lending penetration improve as time elapses. The following tables provide details related to assessment area characteristics and penetration rates for each assessment area. Peoples made extensive use of flexible lending programs for low- or moderate-income borrowers in all limited scope areas.

Peoples entered the Akron MSA in the fourth quarter of 2015. In addition, the Akron MSA contains several college and universities and a military base in low- and moderate-income tracts that could limit lending opportunities.

Akron MSA	Number of Tracts	Number of Branches	Penetration Rate	% Population	% Families	% Families Below Poverty	% Owner-Occupied Units	% Rental/Vacant Units
Low-Income Tract	23	0	21.7%	10.7%	8.9%	30.9%	32.5%	67.5%
Moderate-Income Tract	32	1	28.1%	22.1%	21.3%	37.6%	54.2%	44.8%
Middle-Income Tract	43	1	51.2%	33.3%	34.4%	22.5%	66.7%	33.3%
Upper-Income Tract	37	2	48.7%	33.9%	35.4%	9.1%	78.8%	21.2%

Peoples took the entirety of Cuyahoga County in the Cleveland MSA in 2016. This county contains the majority of low- and moderate-income tracts. In addition, the Cleveland MSA contains universities and large healthcare campuses within low- and moderate-income tracts which could limit lending opportunities

Cleveland-Elyria MSA	Number of Tracts	Number of Branches	Penetration Rate	% Population	% Families	% Families Below Poverty	% Owner-Occupied Units	% Rental/Vacant Units
Low-Income Tract	95	0	5.3%	13.1%	12.0%	40.8%	26.1%	73.9%
Moderate-Income Tract	111	0	8.1%	19.2%	18.1%	28.2%	40.6%	44.8%
Middle-Income Tract	161	0	16.2%	36.7%	36.9%	22.6%	63.5%	33.3%
Upper-Income Tract	116	1	14.7%	31.0%	33.0%	8.5%	76.6%	21.2%

Peoples entered the Dayton MSA in the first quarter of 2015. In addition to the data above, the Dayton MSA contains a large university in low-income tracts, which could limit lending opportunities in this area.

Dayton MSA	Number of Tracts	Number of Branches	Penetration Rate	% Population	% Families	% Families Below Poverty	% Owner-Occupied Units	% Rental/Vacant Units
Low-Income Tract	20	0	0.0%	10.6%	9.5%	31.5%	30.9%	69.1%
Moderate-Income Tract	40	0	12.5%	24.0%	22.8%	34.4%	45.2%	54.8%
Middle-Income Tract	63	1	23.8%	43.0%	43.8%	26.3%	62.4%	37.6%
Upper-Income Tract	29	0	27.6%	22.5%	23.9%	7.8%	75.3%	24.7%

Peoples entered the Non-metropolitan Southeastern Ohio area in the first quarter of 2015.

Non-metropolitan Southeastern Ohio	Number of Tracts	Number of Branches	Penetration Rate	% Population	% Families	% Families Below Poverty	% Owner-Occupied Units	% Rental/Vacant Units
Low-Income Tract	0	0	NA	NA	NA	NA	NA	NA
Moderate-Income Tract	4	1	50.0%	18.9%	18.2%	28.4%	64.1%	46.0%
Middle-Income Tract	13	6	92.3%	75.1%	75.3%	70.3%	65.3%	34.7%
Upper-Income Tract	1	0	100.0%	5.9%	6.5%	1.3%	81.9%	18.1%

For the investment test, Peoples received an “Outstanding” rating for Ohio. The investment activity in the Akron and Cleveland MSAs and Non-metropolitan Southeastern Ohio, which was consistent to the performance for the state, but below that of the Dayton MSA.

For the service test, Peoples received a “High Satisfactory” rating for Ohio. Overall, performance in all limited-scope areas was below Peoples’ performance for the state. Retail services were adequate in all four limited-scope assessment areas. The weaker retail services performance in these areas was primarily due to lesser accessibility of delivery systems in lower-income geographies. Peoples acquired National Bank and Trust since the last examination and opened seven branches in Non-metropolitan Southeastern Ohio (one in a moderate-income tract and six in middle-income tracts, all middle-tracts are distressed) and one branch in the Dayton MSA (upper-income tract). Peoples did not close any branches in the limited-scope areas since the last examination. Within the Cleveland MSA, Peoples expanded the assessment area to take all of Cuyahoga County in 2016, which is where the majority of low- and moderate-income tracts are located. Qualified community development services were good in the Cleveland MSA, poor in the Akron MSA and Non-metropolitan Southeastern Ohio, and very poor in Dayton. The weaker community development services performance was primarily due to fewer hours dedicated to providing qualified services relative to Peoples’ operational presence in these assessment areas.

The performance in the limited-scope assessment area did not change the overall state rating.

## STATE OF WEST VIRGINIA

### **CRA RATING for State of West Virginia: Satisfactory**

**The lending test is rated: High Satisfactory**

**The investment test is rated: Outstanding**

**The service test is rated: High Satisfactory**

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- An excellent geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and a good distribution to businesses of different revenue sizes;
- An adequate record of serving the credit needs of low-income individuals and areas and very small businesses;
- Makes a low level of community development loans;
- Makes use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants; often in a leadership position;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- Provides an adequate level of community development services.

## SCOPE OF EXAMINATION

A full-scope review was conducted for the Parkersburg-Vienna Metropolitan Statistical Area (Parkersburg-Vienna MSA). A limited-scope review was performed on Non-metropolitan Northern West Virginia and Non-metropolitan Western West Virginia. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the institution section of this report.

The Parkersburg-Vienna MSA received greater weight in determining the CRA rating for the state. The Parkersburg-Vienna MSA had the largest lending volume and number of banking centers and share of deposits during the evaluation period. Lastly, the Parkersburg-Vienna MSA represented 54.5% of the banking centers, 34.0% of deposits, and 80.9% of lending in West Virginia.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF WEST VIRGINIA**

Lending activity accounted for 16.8% of Peoples' total lending activity, while deposits accounted for 10.8% of Peoples' total deposits. HMDA-reportable lending in West Virginia represented 20.5% of Peoples' HMDA lending, while CRA-reportable lending represented 10.3% of its total CRA lending. As of June 30, 2016, Peoples ranked third among 17 insured institutions with a deposit market share of 12.0% and 11 banking center locations within West Virginia.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF WEST VIRGINIA**

### **Lending Test**

Peoples' performance under the lending test within the assessment areas located in West Virginia is rated "High Satisfactory." Peoples' lending reflects a good responsiveness to the credit needs in the Parkersburg-Vienna MSA and an adequate responsiveness to credit needs in Non-metropolitan Northern West Virginia and Non-metropolitan Western West Virginia assessment areas.

### ***Lending Activity***

Peoples originated 495 HMDA loans and 138 small business loans during the evaluation period in West Virginia. This represents 16.8% of Peoples' total lending and is greater than the percentage of total deposits at 10.8% for West Virginia.

Lending activity for the state is considered good. Lending activity for the Parkersburg-Vienna MSA is good and adequate for Non-metropolitan Northern West Virginia and Non-metropolitan Western West Virginia.

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

Overall, the distribution of loans among geographies is excellent. The geographic distribution is excellent and there were no gaps in lending identified in the assessment areas in West Virginia.

The distribution of loans among borrowers of different income levels is good and is also good for businesses of different revenue sizes. Borrower distribution is good in the Parkersburg-Vienna MSA and Non-metropolitan Northern West Virginia areas and adequate in the Non-metropolitan Western West Virginia assessment area. Distribution of loans to businesses of different revenue sizes is good in the Parkersburg-Vienna MSA and excellent in Non-metropolitan Western West Virginia.

A detailed analysis for the geographic distribution and borrower-income distribution is provided in the respective analysis for each assessment area.

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

Peoples originated three community development loans totaling \$163,000, which represented 0.2% of Peoples' community development lending by dollar volume. Peoples made a low level of community development loans in the Parkersburg-Vienna MSA and Non-metropolitan Northern West Virginia and received partial qualification for loans in Non-metropolitan Western West Virginia, which is also considered to be a low level of community development loans. Overall, Peoples made a low level of community development loans in West Virginia.

### ***Flexible Lending***

Peoples consistently makes use of flexible lending practices within the assessment areas located in West Virginia. The Parkersburg-Vienna MSA made extensive use of flexible lending products, while Non-metropolitan Northern West Virginia and Non-metropolitan Western West Virginia had no use of flexible lending products.

### **Investment Test**

Peoples' investment test performance is rated "Outstanding." Peoples funded six community development investments and donations totaling \$1.4 million in West Virginia consisting of \$1.1 million obtained from new investments made during the current review period and \$344,000 from prior period investments. The majority of investments were development bonds. The remaining \$33,000 was smaller dollar donations. Peoples' level of qualified investments is excellent for all three assessment areas located in West Virginia.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

### **Service Test**

Peoples' performance under the service test with the assessment areas located in West Virginia is rated "High Satisfactory." Peoples' performance was good in the Parkersburg-Vienna MSA and Non-metropolitan Northern West Virginia and was adequate in Non-metropolitan Western West Virginia.

### ***Retail Services***

Retail delivery systems are accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in Peoples' assessment areas in West Virginia. Retail service distribution is good in the Parkersburg-Vienna MSA and Non-metropolitan Northern West Virginia. Retail service distribution is adequate in Non-metropolitan Western West Virginia.

Peoples' record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. No branches were opened or closed in low- or moderate-income tracts in West Virginia during the evaluation period.

Banking services and business hours do not vary in a way that inconveniences any portions of Peoples' assessment areas and are consistent with the services and hours discussed in the Institution assessment.

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

Peoples provides an adequate level of community development services. Peoples' performance is adequate in the Parkersburg-Vienna MSA and Non-metropolitan Northern West Virginia and poor in Non-metropolitan Western West Virginia.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's Service Test section in this report.

**METROPOLITAN AREA**  
*(Full-scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE  
PARKERSBURG-VIENNA WV MSA #37620**

The Parkersburg-Vienna MSA consists of the entireties of Wirt and Wood counties in West Virginia; however, Peoples’ assessment area only encompasses the entirety of Wood County., This assessment area consists of a total of 26 census tracts: five moderate-income census tracts (19.2%), 17 middle-income tracts (65.4%), and four upper-income tracts (15.4%). Peoples has six offices in Wood County, one in a moderate-income tract and five in middle-income census tracts.

Wood County is located in northwestern West Virginia along the Ohio River. Parkersburg is the largest city and county seat. The county had a population of 86,956, according to the 2010 U.S. Census.

According to the June 30, 2016 FDIC Deposit Market Share Report, Peoples ranked seventh out of 11 institutions in the market with a deposit share of 6.2% in the assessment area.<sup>28</sup>

As shown in the table below, United Bank had the majority market share with 34.7% of deposits. The next three largest institutions, Westbanco Bank, Branch Banking and Trust Company, and Community Bank of Parkersburg had 14.7%, 13.9%, and 10.9% of the market share, respectively. Deposits in this assessment area accounted for 3.7% of Peoples’ total deposits. This was the seventh-highest percentage of deposits within Peoples’ CRA footprint.

#	Financial Institution	Deposit Market Share
1	United Bank	34.7%
2	Westbanco Bank, Inc.	14.7%
3	Branch Banking and Trust Company	13.9%
4	Community Bank of Parkersburg	10.9%
5	Williamstown Bank, Inc.	8.8%
6	The Huntington National Bank	7.0%
7	Peoples Bank	6.2%

From January 1, 2014 through July 31, 2016, Peoples originated 409 HMDA loans (210 home purchase loans, 157 home refinance loans, 39 home improvement loans, and three multi-family loans) and 103 CRA loans, which represented 17.0% and 7.7% of the total loans originated during the evaluation period, respectively. This was the second-largest HMDA market and fourth-largest CRA market for loans originated during the evaluation period.

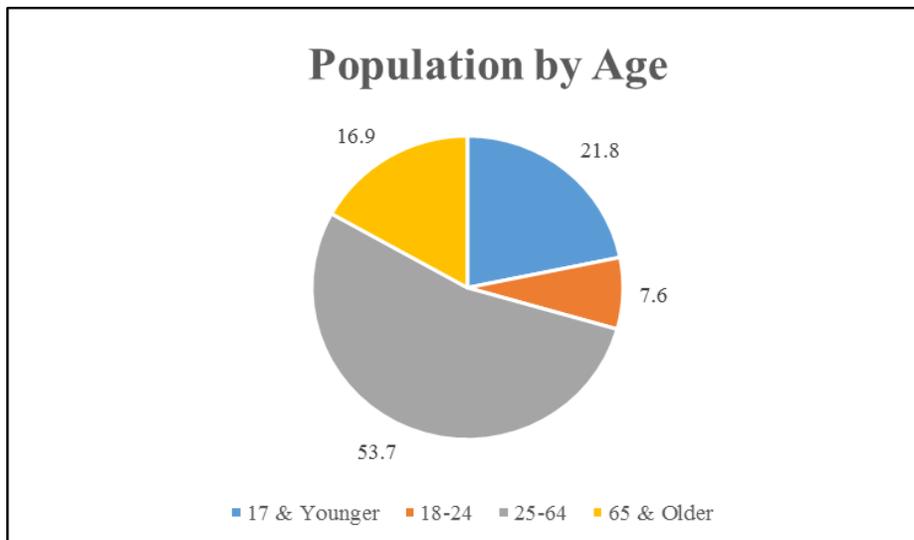
<sup>28</sup> <http://www2.fdic.gov/sod/sodMarketBank.asp>

In 2015, Peoples ranked second among 100 HMDA reporters in the assessment area. Community Bank of Parkersburg was the top HMDA lender in the assessment area. Peoples ranked 10<sup>th</sup> of 29 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were United Bank, American Express, Synchrony Bank, and Capital One. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

One community contact interview was conducted to provide additional information regarding the assessment area. The contact represented a real estate brokerage and stated that current economic conditions are distressed and impoverished in the county, which is mostly rural and sparsely populated. The contact stated that the primary banking needs are residential mortgage lending and small business lending and that local banks were meeting the credit needs of local residents. In addition, large financial institutions from outside the area tend to participate in community development projects, leaving limited opportunities for local banks.

### **Population Characteristics**

According to the 2010 U.S. Census, the total population in the assessment area was 86,956. Approximately, 15.8% of the assessment area's population resides in moderate-income tracts, while 70.9% resides in middle-income tracts and 13.3% in upper-income tracts. As shown in the chart below, 78.1% of the population is 18 years of age or older, which is the legal age to enter into a contract, while 61.2% of the population is between the ages of 18 and 64 and more likely to have credit needs.



As depicted in the following table, the population in the Parkersburg-Vienna MSA is relatively stable, and shows the population in the assessment area by county for 2010 and 2015,<sup>29</sup> with the percentage of the population increase or decrease.

County	2010 Population	2015 Population	Population Percent Change
Wood WV	86,956	86,452	-0.6%
<b>Total</b>	<b>86,956</b>	<b>86,452</b>	

### Income Characteristics

According to data from the United States Department of Housing and Urban Development (HUD), the 2010 median family income levels for the assessment area was \$52,107. The MSA-estimated median family income levels increased in 2014 and 2015, but decreased in 2016, as detailed in the following table.<sup>30</sup>

#### **Borrower Income Levels Parkersburg-Vienna, WV - MSA**

HUD Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2014</b>	<b>\$54,600</b>	0 - \$27,299	\$27,300 - \$43,679	\$43,680 - \$65,519	\$65,520 - & above
<b>2015</b>	<b>\$56,300</b>	0 - \$28,149	\$28,150 - \$45,039	\$45,040 - \$67,559	\$67,560 - & above
<b>2016</b>	<b>\$50,900</b>	0 - \$25,449	\$25,450 - \$40,719	\$40,720 - \$61,079	\$61,080 - & above

The assessment area contains 36,222 households, of which 23,934 (66.1%) are designated as families. Low- and moderate-income families represent 20.6% and 16.5% of all families in this assessment area, respectively, with 12.3% of families below the poverty level as compared to 12.8% of all families below the poverty level within West Virginia.

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

County	2014 Poverty Rate	2015 Poverty Rate	Change
Wood	17.2%	17.3%	0.58%
<b>West Virginia</b>	<b>18.3%</b>	<b>18.0%</b>	<b>-1.67%</b>
<b>United States</b>	<b>15.5%</b>	<b>14.7%</b>	<b>-5.44%</b>

The poverty rate for Wood County remained constant from 2014 to 2015 and is below the poverty rate of the state, but above the poverty rate for the nation.

<sup>29</sup> Population data is derived from the U.S. Census Data 2015 Statistical Abstract (enter state, county, town or zip code): [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml#](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#)

<sup>30</sup> HUD Medium Family Income: <http://www.huduser.org/portal/datasets/il/il13/index.html>

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

The following table identifies the primary employment sectors by number of employees and major employers in this assessment area.<sup>31</sup>

County	Primary Employment Sectors	Major Employers
Wood WV	Healthcare & Social Assistance; Retail Trade; Manufacturing Accomodation and Food Service; and Educational Services	Camden-Clark Memorial Hospital; DuPont; Wood County Board of Education; and the U.S. Treasury Department's Bureau of Public Debt

The following table shows the average annual unemployment rate for 2014, 2015, and 2016 for Wood County, the Parkersburg-Vienna MSA, West Virginia, and the nation.

#### **Unemployment Rates Peoples Bank, Marietta, OH: Parkersburg-Vienna, WV - MSA**

Area	Years - Annualized		
	2014	2015	2016
Wood Co.	5.5	5.5	4.9 (P)
<b>Parkersburg-Vienna, WV MSA</b>	<b>5.7</b>	<b>5.7</b>	<b>5.0(P)</b>
<b>West Virginia</b>	<b>6.0</b>	<b>5.9</b>	<b>5.1 (P)</b>
<b>National</b>	<b>5.4</b>	<b>4.8</b>	<b>4.5</b>

Not Seasonally Adjusted, Data Extracted on February 7, 2017

P: Preliminary

Wood County's unemployment rate is lower than the MSA and West Virginia for all three years and above the national unemployment rate for all three years.

### **Housing Characteristics**

There are 40,269 housing units and 23,934 families in this assessment area, based on the 2010 U.S. Census. From an income perspective, 16.6% of housing units, 49.9% of owner-occupied units, and 14.0% of families are located in moderate-income tracts. Half of the housing units in the moderate-income census tracts are either rental or vacant (50.1%). The high number of rental and vacant units in moderate-income tracts compared to the number of families in these tracts suggests there is a limited opportunity for mortgage credit in low- and moderate-income geographies.

The median age of housing stock was 44 years, according to the 2010 U.S. Census, with 24.0% of housing built prior to 1950. Within the assessment area, the median age of housing stock was 57 years in moderate-income tracts. Older homes are typically more likely to require repairs and rehabilitation; therefore, this assessment area's aging housing stock could represent opportunities for Peoples to provide home improvement and rehabilitation loans in moderate-income areas.

<sup>31</sup> [Primary employment sectors: https://datausa.io/profile/geo/wood-county-wv/#economy](https://datausa.io/profile/geo/wood-county-wv/#economy)

[Major employers: http://www.wvcommerce.org/people/communityprofiles/populationcenters/parkersburg.aspx](http://www.wvcommerce.org/people/communityprofiles/populationcenters/parkersburg.aspx)

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$102,524 with an affordability ratio of 40.9%. 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 Parkersburg-Vienna MSA (\$50,900), approximately 43.4% of the homes valued up to \$93,289 in the assessment area would be considered affordable for low-income individuals and 72.3% of the homes valued up to \$149,262 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 Wood County was \$96,600, with an appreciation of 5.6% over the prior year.<sup>32</sup>

The median gross rent in the assessment area was \$569, with 12.0% of the rental units having rents of less than \$350 a month, according to the 2010 U.S. Census. The majority of rents (34.7%) in this assessment area were \$500-\$699 per month and 21.5% of rents were \$350-\$499, while 23.1% of rents were greater than \$700. Approximately 24.0% of all housing units in the assessment area are rental units. Additionally, 46.9% of renters have rent costs greater than 30.0% of their income.

One in every 2,601 properties in Wood County was in foreclosure in January 2017. This was higher than West Virginia’s ratio of one in every 7,529 properties, but lower than the national rate of one in every 1,594 properties. The following table contains information about foreclosure filings in the assessment area according to Realtytrac.<sup>33</sup>

<b>Geography Name</b>	<b>Ratio of Properties Receiving Foreclosure Filings in (January 2017)</b>
Wood WV	1:2,601
<b>West Virginia</b>	<b>1:7,529</b>
<b>United States</b>	<b>1:1,594</b>

The following table illustrates the demographics in the Parkersburg-Vienna MSA.

32 Sperling’s Best Places, [www.bestplaces.net](http://www.bestplaces.net)

33 [www.realtytrac.net](http://www.realtytrac.net)

## Combined Demographics Report

Assessment Area(s): Parkersburg/Vienna 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	4,927	20.6
Moderate-income	5	19.2	3,346	14	983	29.4	3,944	16.5
Middle-income	17	65.4	17,308	72.3	1,684	9.7	5,596	23.4
Upper-income	4	15.4	3,280	13.7	282	8.6	9,467	39.6
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>26</b>	<b>100.0</b>	<b>23,934</b>	<b>100.0</b>	<b>2,949</b>	<b>12.3</b>	<b>23,934</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6,670	3,330	12.5	49.9	2,526	37.9	814	12.2
Middle-income	28,277	19,340	72.8	68.4	6,147	21.7	2,790	9.9
Upper-income	5,322	3,905	14.7	73.4	974	18.3	443	8.3
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>40,269</b>	<b>26,575</b>	<b>100.0</b>	<b>66.0</b>	<b>9,647</b>	<b>24.0</b>	<b>4,047</b>	<b>10.0</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	822	24.3	731	23.6	84	32.4	7	29.2
Middle-income	2,160	63.8	1,994	64.3	151	58.3	15	62.5
Upper-income	403	11.9	377	12.2	24	9.3	2	8.3
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>3,385</b>	<b>100.0</b>	<b>3,102</b>	<b>100.0</b>	<b>259</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.6</b>		<b>7.7</b>		<b>.7</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	4	4.9	4	4.9	0	0	0	0
Middle-income	75	92.6	75	92.6	0	0	0	0
Upper-income	2	2.5	2	2.5	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>81</b>	<b>100.0</b>	<b>81</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>.0</b>		<b>.0</b>

2016 FFIEC Census Data and 2015 D&B Information

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PARKERSBURG-VIENNA WV MSA**

### **Lending Test**

Lending performance in the Parkersburg-Vienna MSA is rated “High Satisfactory.” Peoples demonstrated a good responsiveness to the credit needs of the community. In addition, Peoples made a low level of community development lending, with one community development loan originated totaling \$100,000. Peoples has an excellent geographic distribution of loans and no lending gaps, a good distribution among borrowers of different income levels, and a good distribution to businesses of different revenue sizes. Peoples exhibits a good record of serving the credit needs of low-income individuals, or businesses with gross annual revenues of \$1 million or less. The use of flexible lending programs augmented Peoples’ performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase and refinance lending based on overall volume, followed by small business and home improvement lending. There were not enough multi-family or small farm loans to conduct a meaningful analysis. More weight was given to borrower distribution based on the percentage of low- and moderate-income tracts (19.2%) compared to the percentage of low-and moderate-income individuals (37.1%). In addition, Peoples’ lending performance was compared to the 2014 and 2015 aggregate performance of all lenders required to report HMDA and CRA data within the respective assessment areas. Details of Peoples’ residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix D.

### ***Lending Activity***

Lending activity reflects a good responsiveness to the credit needs within the assessment area. Peoples originated 409 HMDA loans (210 home purchase, 157 refinance, 39 home improvement, and three multi-family) and 103 CRA loans (102 small business and one small farm) in this assessment area. This represents 13.6% of Peoples’ total lending and is greater than the percentage of total deposits at 3.7% in this area.

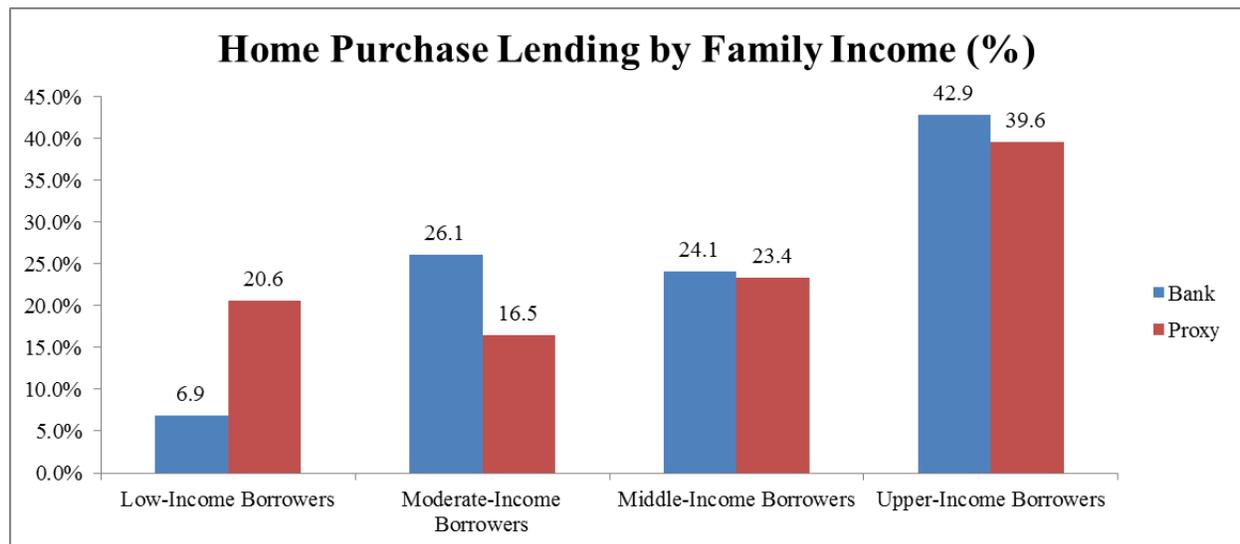
### ***Borrower Distribution of Lending***

Overall, the distribution of loans is good based on borrower income and good for businesses of different revenue sizes. Borrower distribution is good for home purchase, refinance, and small businesses with revenues less than or equal to \$1 million. Borrower distribution is excellent for home improvement lending.

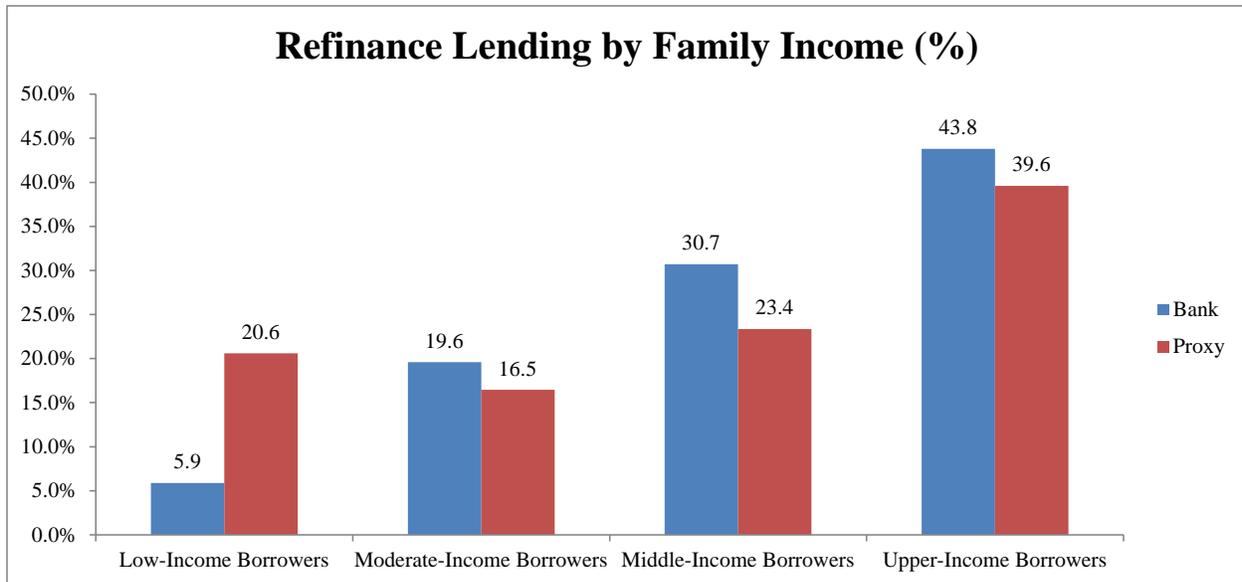
As mentioned previously, based on the 2015 median family income for the MSA, approximately 43.4% of the homes valued up to \$93,289 would be considered affordable for low-income individuals and approximately 72.3% of the homes valued up to \$149,262 would be considered affordable for moderate-income individuals. Rental and vacant units make up 34.0% of the housing units in the assessment area. Low- and moderate-income families make up 37.1% of the families living in assessment area, with 12.2% of families below the poverty level.

*Home Purchase Lending*

Peoples’ performance was compared to the income levels of families in the assessment area (proxy) that are HMDA reporters. As shown in the chart below, Peoples’ home purchase lending is well below proxy and slightly below the aggregate. The lower affordability ratio and higher percentage of rental and vacant units and low- and moderate-income families in the assessment area may limit lending opportunities. Peoples was well above proxy and the aggregate for lending to moderate-income borrowers. Overall, home purchase lending among borrowers of different incomes is good.

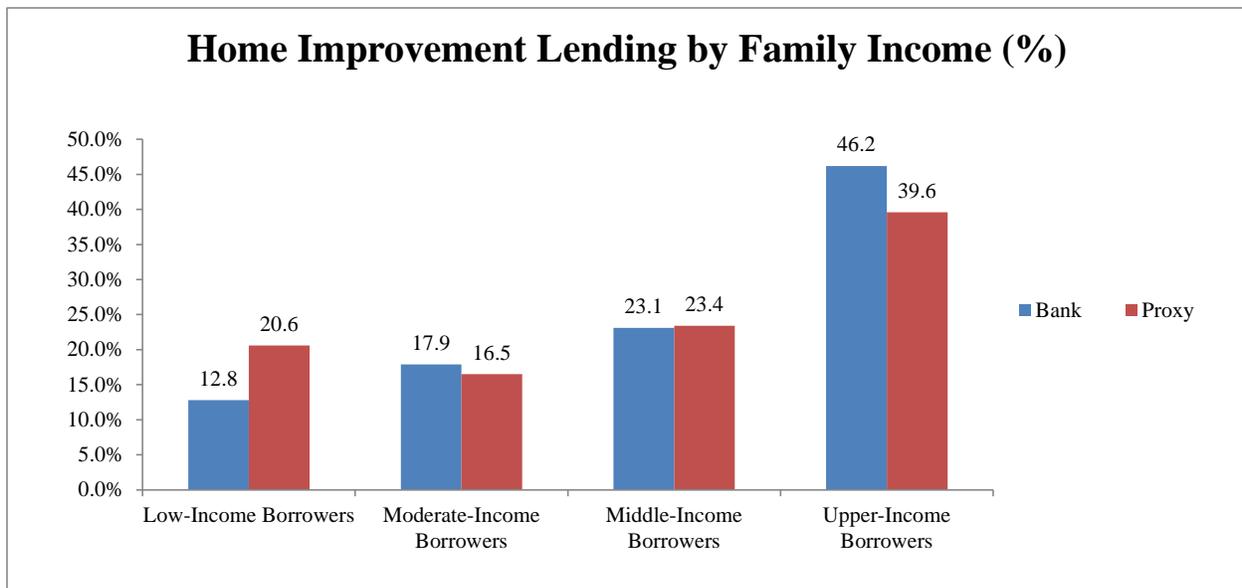


As shown in the following graph, Peoples’ refinance lending is well below proxy for lending to low-income borrowers and slightly below the aggregate. The higher percentage of rental and vacant units and low- and moderate-income families in the assessment area may limit lending opportunities. Peoples’ lending to moderate-income borrowers was slightly above proxy and slightly above the aggregate. Overall, refinance lending among borrowers of different incomes is good.



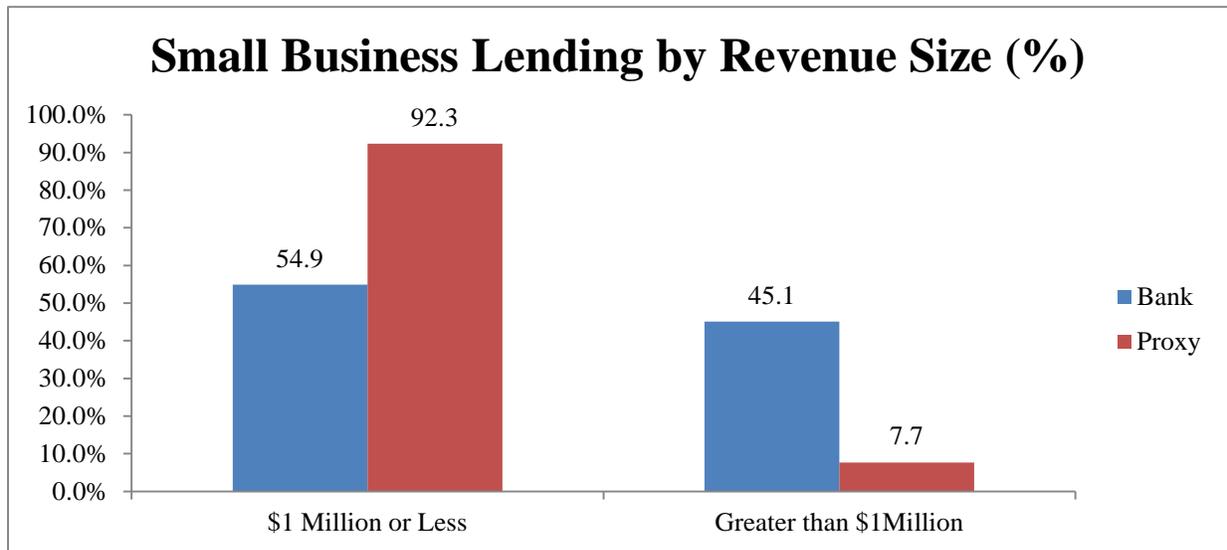
### *Home Improvement Lending*

Peoples' home improvement lending to low-income borrowers was below the percentage of low-income families (proxy), but slightly above the aggregate. Lending to moderate-income borrowers was slightly above proxy, but slightly below the aggregate. Home improvement lending among borrowers of different incomes is excellent.

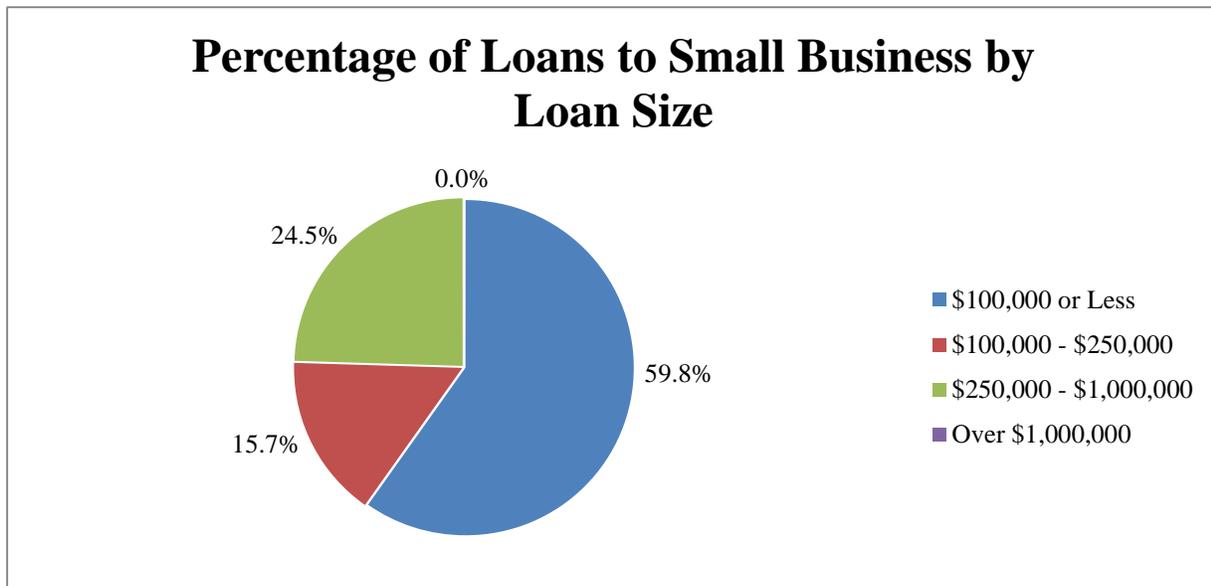


### *Small Business Lending*

As depicted in the following graph, Peoples' lending to businesses with revenues of \$1 million or less is below the percentage of such businesses in the assessment area, but slightly above the aggregate.



Further analysis of small business lending shows that 59.8% of Peoples’ small business loans were made 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 distribution of loans based on small business lending to businesses based on revenue size is considered good.



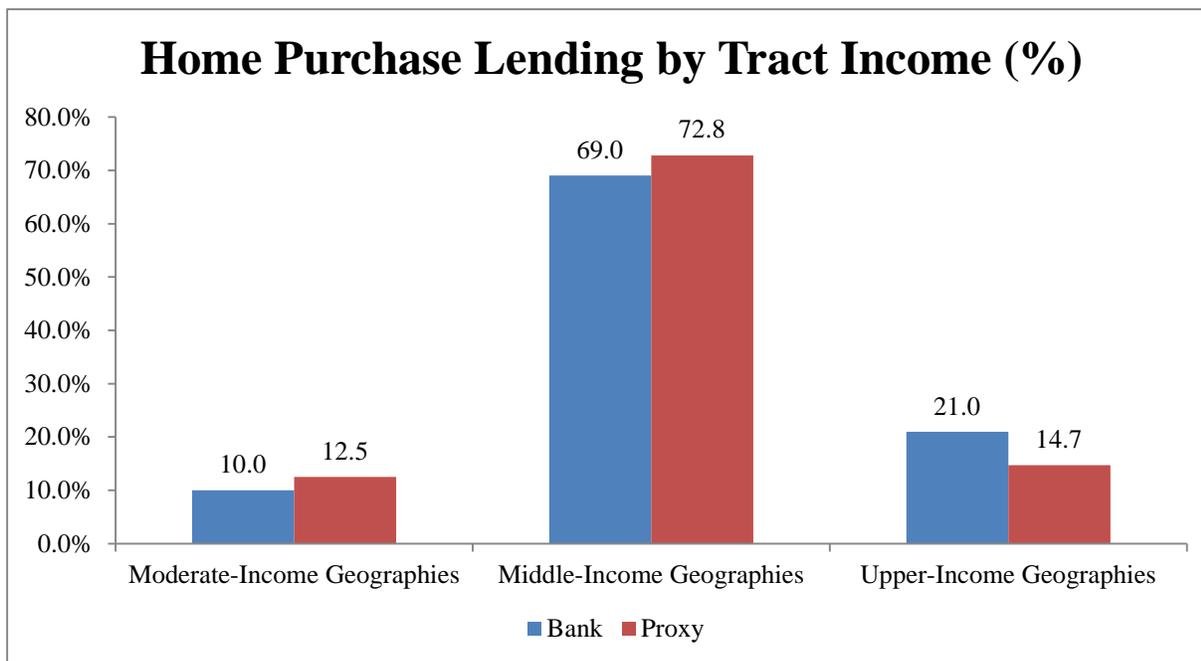
***Geographic Distribution of Lending***

Peoples’ overall distribution of lending among geographies is excellent. All HMDA categories were considered excellent, while performance for small business lending is good. Further, no lending gaps were identified, as loans were made in all tracts for this assessment area.

Housing characteristics of the assessment area based on the 2010 U.S. Census data include the following: 14.0% of families reside in moderate-income tracts and of these, 26.1% are low-income families and 16.9% are moderate-income families. Further, 16.6% of all housing units are in moderate-income tracts within the assessment area. Of the units in moderate-income tracts, only 49.9% are owner-occupied, which was lower than the overall owner-occupancy rate for the assessment area (66.0%), 37.9% are rental units, and 12.2% are vacant. These factors may have limited the opportunities to originate residential mortgage loans.

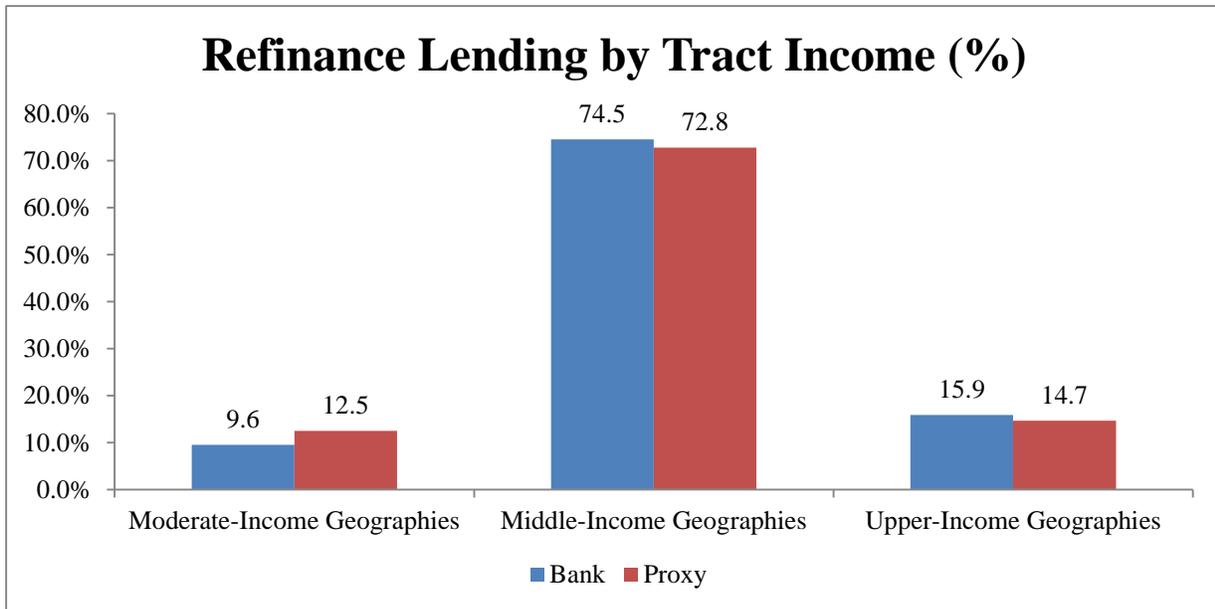
*Home Purchase Lending*

Home purchase lending in moderate-income tracts was slightly below the percentage of owner-occupied units (proxy) and slightly below the aggregate. The high percentage of rental and vacant units in the moderate-income tract (50.1%) and the high percentage of low- and moderate-income families residing in moderate-income tracts (26.1% and 16.9%, respectively) could limit home purchase lending. The geographic distribution of home purchase loans is considered excellent.



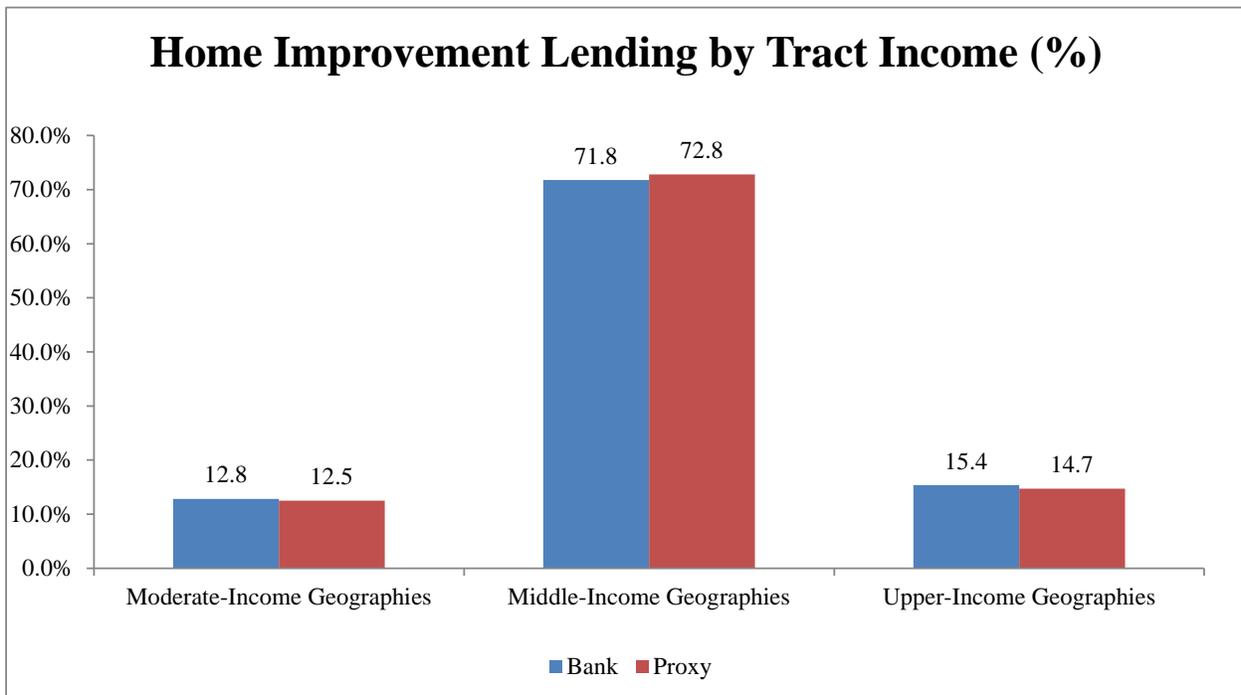
*Refinance Lending*

Refinance lending in moderate-income tracts was slightly below the percentage of owner-occupied units (proxy) and slightly below peer. The high percentage of rental and vacant units in the moderate-income tract (50.1%) and the high percentage of low- and moderate-income families residing in moderate-income tracts (26.1% and 16.9%, respectively) could limit refinance lending. The geographic distribution of refinance loans is considered excellent.



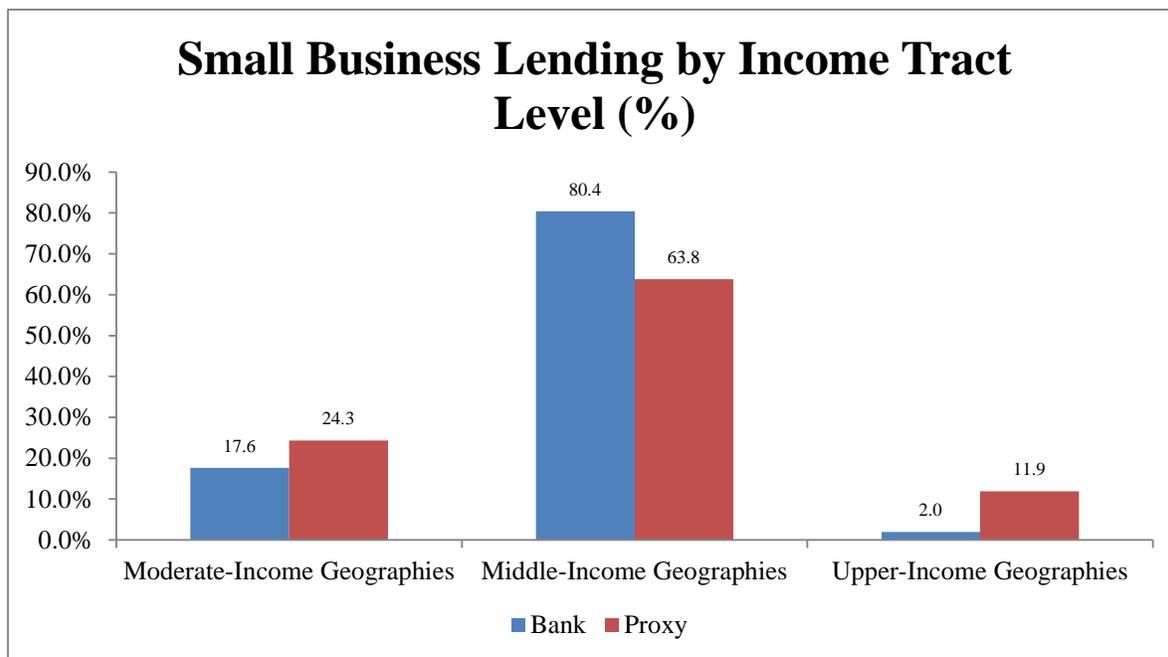
#### *Home Improvement Lending*

Peoples' home improvement lending in moderate-income tracts was above the percentage of owner-occupied units (proxy), but slightly below the aggregate. The geographic distribution of refinance loans is considered excellent.



*Small Business Lending*

Small business lending was slightly below the percentage of small businesses located in moderate-income tracts (proxy) and below aggregate. Overall, the geographic distribution of small business lending is good.



*Community Development Loans*

Peoples originated one community development loan with a community service purpose totaling \$100,000 in this assessment area, which represented 2.1% of the total dollar volume of community development loans originated by Peoples during the evaluation period, while this assessment area represented 3.7% of Peoples’ total deposits. Overall, Peoples makes a low level of community development loans in this assessment area.

*Flexible Lending Programs*

In addition to traditional bank products, Peoples offers and participates in flexible lending programs such as the Small Business Administration (SBA) loans to small businesses, which are more complex to originate; USDA Rural Housing loans; Section 502 loans primarily used to help low-income borrowers purchase homes in rural areas; Welcome Home Grants that provide grant money (\$5,000 per household) to low- or moderate-income applicants for down payment and closing cost assistance; and the Hardest Hit Fund Program (in Ohio, the program is ‘Save the Dream Ohio;’ in Kentucky, it is ‘Protect my Kentucky Home’), which provides mortgage assistance to unemployed borrowers. In addition, Peoples developed an internal low-income product, ‘Dreams 2 Keys,’ which provides viable lending options specific to low-income borrowers.

These types of programs allow Peoples to address the credit needs of low- and moderate-income borrowers in a safe and sound manner and have augmented its performance within the assessment area. The following table provides a breakout of the various flexible loan programs offered during the review period and reflects an extensive use of these programs.

<b>Flexible Lending Program</b>	<b>Total Number of Loans</b>	<b>Total Balance</b>
SBA	5	\$2,240,000
USDA Rural Housing	16	\$1,811,955
Welcome Home Grants	1	\$55,800
Dreams 2 Keys	10	\$744,205
<b>Total</b>	<b>32</b>	<b>\$4,851,960</b>

**Investment Test**

Peoples made two investments totaling \$489,000 in this assessment area, both of which supported affordable housing. One investment was a new bond purchase in the amount of \$370,000 to increase the supply of residential housing and financing for low- and moderate-income families through construction and permanent mortgage financing. The second investment was a prior period bond purchase with a current book value of \$119,000. In addition, 10 donations were made totaling \$17,520 that supported a variety of activities covering community services to low- and moderate-income individuals, including, but not limited to, replenishing food pantries, financial literacy, economic development for disaster relief, and support for small businesses.

Community development investments and donations for this assessment area represented 3.6% of the total dollar volume of community development investments and donations originated by Peoples during the evaluation period. This is higher than the percentage of total deposits of 3.7% for this assessment area and is considered to be an excellent level of qualified community development investments and donations.

**Service Test**

***Retail Services***

Delivery services are accessible. Peoples did not open or close any offices in this assessment area since the previous evaluation; therefore, its record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income families.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or families and are consistent with the services and hours discussed in the institutional assessment.

Peoples had a total of six banking centers within this assessment area as of February 27, 2017, including one in moderate- and five in middle-income census tracts. The banking centers in this assessment area represent 8.1% of all of Peoples’ banking centers. Peoples had a total of six full-service ATMs within this assessment area as of February 27, 2017, including one in moderate- and five in middle-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts and the percentage of families living in those tracts.

<b>Tract Income Category</b>	<b>Percentage of Banking Centers</b>	<b>Percentage of ATMs</b>	<b>Percentage of Tracts</b>	<b>Percentage of Families in Tracts</b>
Low	NA	NA	NA	NA
Moderate	16.67%	16.67%	19.23%	13.98%
Middle	83.33%	83.33%	65.38%	72.32%
Upper	0.00%	0.00%	15.38%	13.70%

The branch/ATM distribution reflects a good dispersion within low- and moderate-income tracts.

***Community Development Services***

Peoples provided an adequate level of community development services in this assessment area. Four staff members provided community services to four different organizations for a total of 126 hours. Services provided included financial expertise on boards and financial education.

**METROPOLITAN AREA**  
*(Limited-scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN WEST VIRGINIA**

- Non-metropolitan Northern West Virginia
  - As of June 30, 2016, Peoples operated three branches in the assessment area, representing 27.3% of its branches in West Virginia.
  - As of June 30, 2016, Peoples had \$101,294 in deposits in this assessment area, representing a market share of 4.0% and 37.0% of its statewide deposits.
- Non-metropolitan Western West Virginia
  - As of June 30, 2016, Peoples operated two branches in the assessment area, representing 18.2% of its branches in West Virginia.
  - As of June 30, 2016, Peoples had \$79,283 in deposits in this assessment area, representing a market share of 3.1% and 29.0% of its statewide deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA**

Through the use of available facts and data, including performance and demographic information, each assessment area’s performance was evaluated and compared with Peoples’ performance in this state. The conclusions regarding performance are provided in the tables below. Please refer to the tables in Appendix D for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Non-metropolitan Northern West Virginia	Below	Consistent	Consistent
Non-metropolitan Western West Virginia	Below	Consistent	Below

For the lending test, Peoples received a “High Satisfactory” rating in West Virginia. Performance in both limited-scope assessment areas was below Peoples’ performance for the state. Lending levels were excellent for the geographic distribution of loans in both limited-scope areas. Non-metropolitan Northern West Virginia was good for borrower distribution of loans, while Non-metropolitan Western West Virginia was adequate. Non-metropolitan Northern West Virginia and Non-metropolitan Western West Virginia had a low level of community development loans. There were no gaps in lending in either limited-scope assessment areas, as loans were made in all census tracts. Neither limited-scope area made use of flexible lending programs for low- or moderate-income borrowers.

For the investment test, Peoples received an “Outstanding” rating for West Virginia. The investment activity in both limited-scope areas was consistent to the performance for the state.

For the service test, Peoples received a “High Satisfactory” rating for West Virginia. Overall, performance in Non-metropolitan Northern West Virginia was consistent with Peoples’ performance for the state, retail services were consistent with performance for the state, and qualified community development services were adequate.

Performance in Non-metropolitan Western West Virginia was below Peoples' performance for the state. Retail services were reasonably accessible and no community development services were provided. A weaker retail service was primarily due to reduced accessibility of delivery systems in moderate-income geographies, although no lending gaps were identified. A weaker community development service was due to a lack of qualified community service activity in Non-metropolitan Western West Virginia.

The performance in the limited-scope assessment areas did not change the overall state rating.

**APPENDIX A**  
**SCOPE OF EXAMINATION TABLE**

<b>TIME PERIOD REVIEWED</b>	January 1, 2014 through July 31, 2016		
<b>FINANCIAL INSTITUTION</b> Peoples Bank Marietta, Ohio			<b>PRODUCTS REVIEWED</b> HMDA Reportable CRA Reportable
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b> -
None	None		None

<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>	
<b>ASSESSMENT AREA/TYPE OF EXAMINATION</b>	<b>BANKING CENTERS VISITED</b>
<p><b><i>Multi-state – full-scope review</i></b></p> <ul style="list-style-type: none"> <li>• Huntington-Ashland WV-KY-OH MSA</li> </ul>	None
<p><b><i>Ohio – full-scope reviews</i></b></p> <ul style="list-style-type: none"> <li>• Non-metropolitan Central Ohio</li> <li>• Cincinnati OH MSA</li> <li>• Columbus OH MSA</li> </ul> <p><b><i>Ohio – limited-scope reviews</i></b></p> <ul style="list-style-type: none"> <li>• Non-metropolitan Southeastern Ohio</li> <li>• Akron OH MSA</li> <li>• Cleveland OH MSA</li> <li>• Dayton OH MSA</li> </ul>	None
<p><b><i>West Virginia – full-scope review</i></b></p> <ul style="list-style-type: none"> <li>• Parkersburg-Vienna WV MSA</li> </ul> <p><b><i>West Virginia – limited-scope review</i></b></p> <ul style="list-style-type: none"> <li>• Non-metropolitan Northern West Virginia</li> <li>• Non-metropolitan Western West Virginia</li> </ul>	None

**APPENDIX B**

**SUMMARY OF INSTITUTION, MULTI-STATE AND STATE RATINGS**

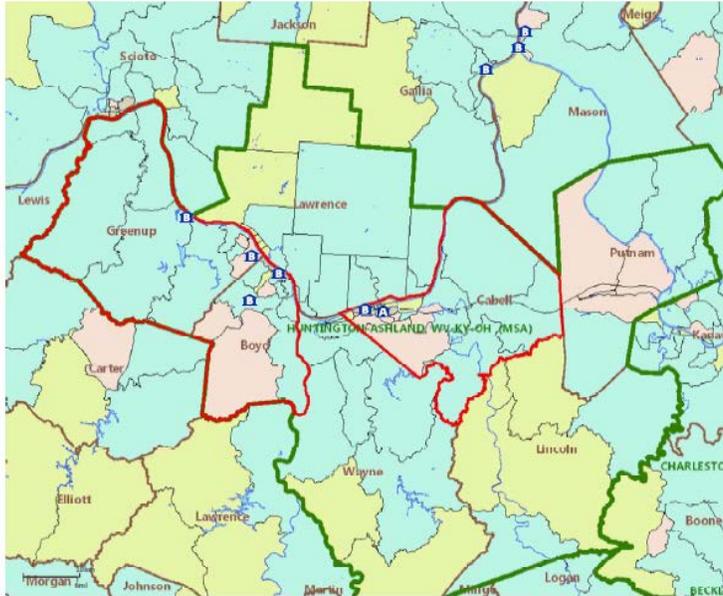
<b>Institution Rating</b>	<b>Lending Test Rating</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall State Rating</b>
Institution	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
<b>Multi-state MSA Ratings</b>				
Huntington-Ashland WV-KY-OH	Outstanding	Outstanding	High Satisfactory	Satisfactory
<b>State MSA Ratings</b>				
State of Ohio	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of West Virginia	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

APPENDIX C

ASSESSMENT AREA MAPS

Huntington-Ashland, WV KY OH MSA #26580

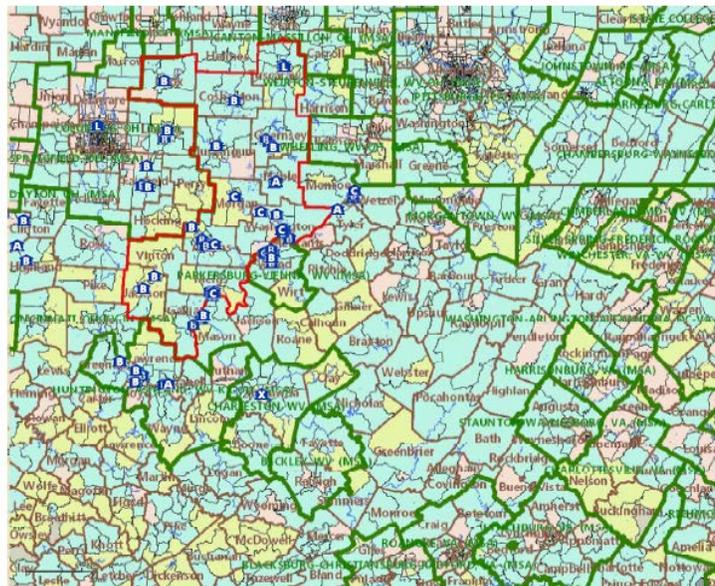
Assessment Area: Huntington Ashland MSA



LEGEND	
2010 Census Year	
<b>INCOME</b>	
[Lightest Green]	Low
[Medium Green]	Moderate
[Darker Green]	Middle
[Darkest Green]	Upper
[Grey]	Unknown
[Red Line]	AA Boundary
<b>BANK BRANCHES</b> Inside and Outside AA	
[Blue Square]	Branches with ATM - 63
[Blue Square with Cross]	Branches without ATM - 13
[Blue Square with Circle]	Cash Only ATM - 13
[Blue Square with Star]	Closed - 3
[Blue Square with House]	Loan Prod. Office - 3
[Blue Square with Person]	Main Office with ATM - 1
<b>FEATURES</b>	
[Light Blue]	Water Body

Non-metropolitan Central Ohio

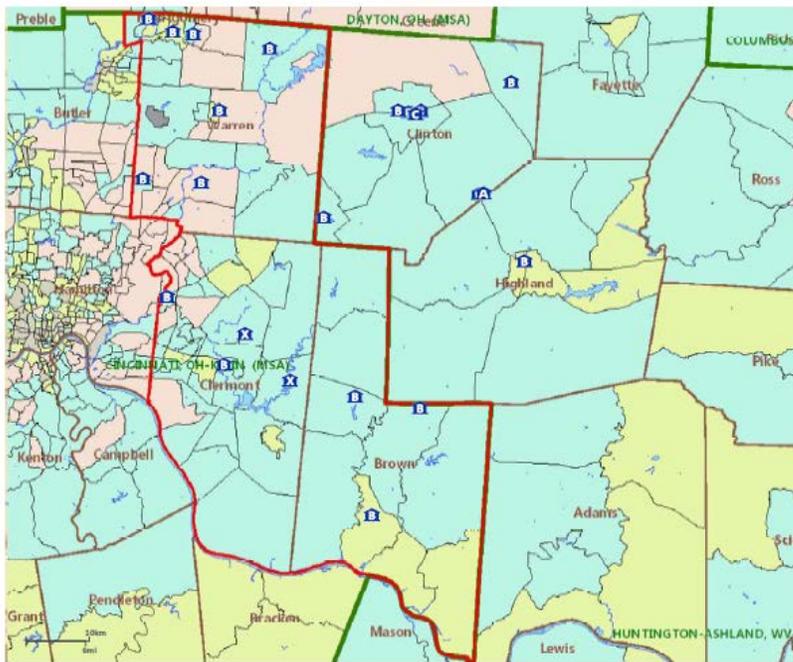
Assessment Area: Ohio Central Non MSA



LEGEND	
2010 Census Year	
<b>INCOME</b>	
[Lightest Green]	Low
[Medium Green]	Moderate
[Darker Green]	Middle
[Darkest Green]	Upper
[Grey]	Unknown
[Red Line]	AA Boundary
<b>BANK BRANCHES</b> Inside and Outside AA	
[Blue Square]	Branches with ATM - 63
[Blue Square with Cross]	Branches without ATM - 13
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[Blue Square with House]	Loan Prod. Office - 3
[Blue Square with Person]	Main Office with ATM - 1
<b>FEATURES</b>	
[Light Blue]	Water Body

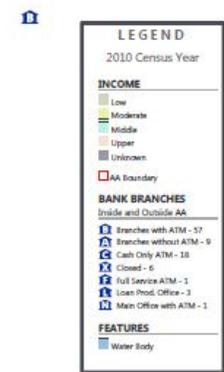
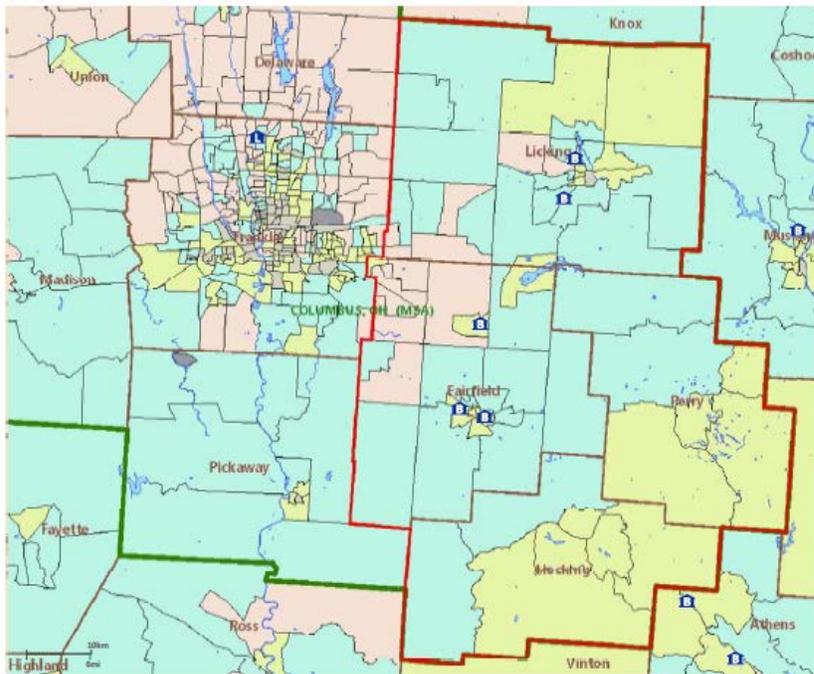
**Cincinnati OH-KY-IN MSA #17140**

Assessment Area: Cincinnati MSA



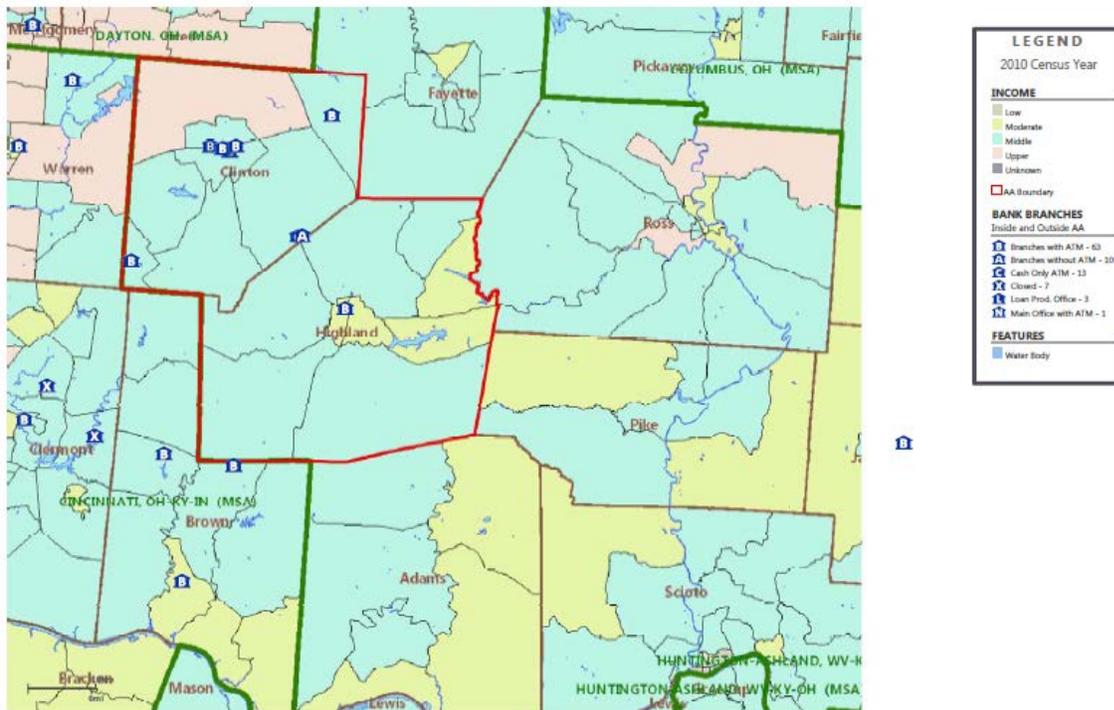
**Columbus OH MSA #18140**

Assessment Area: Columbus MSA 2016



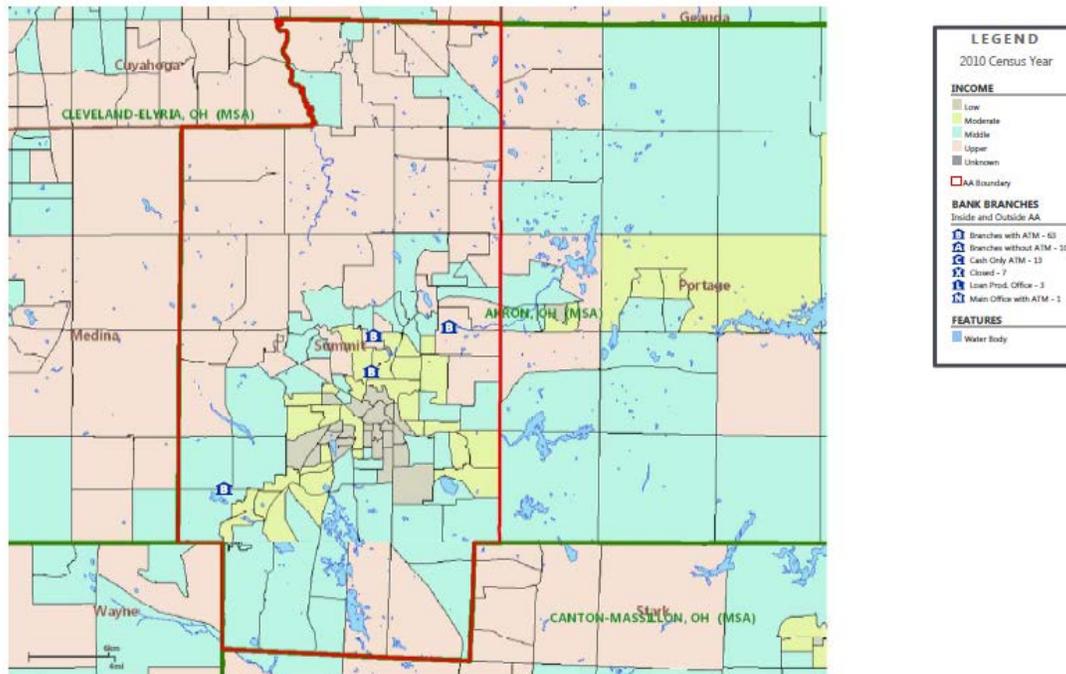
**Non-metropolitan Southeastern Ohio**

Assessment Area: Ohio SE Non MSA



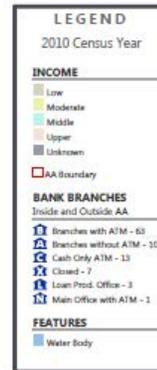
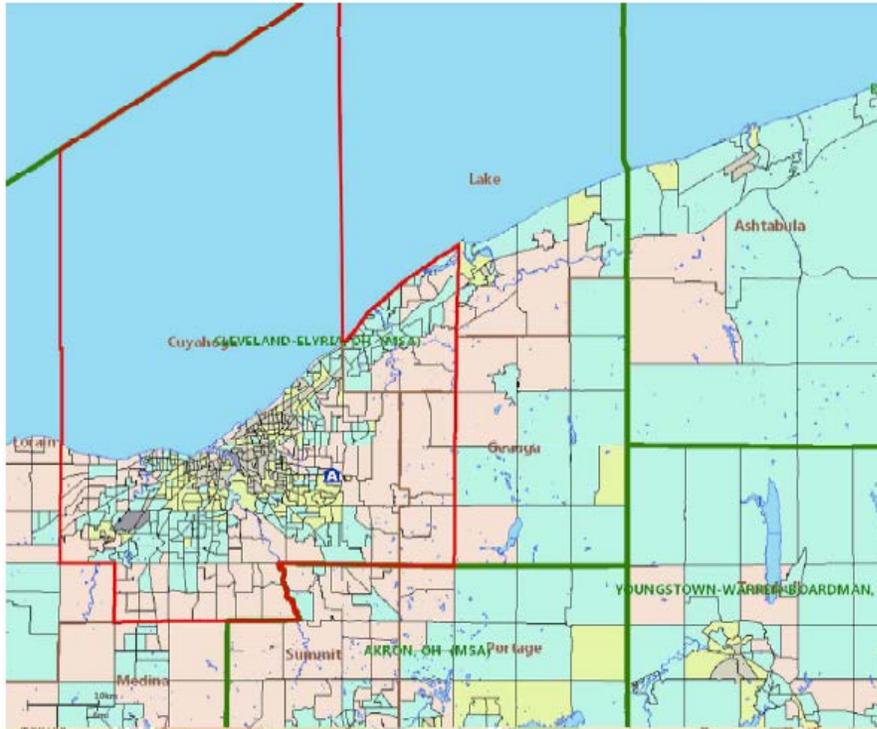
**Akron OH MSA #10420**

Assessment Area: Akron MSA



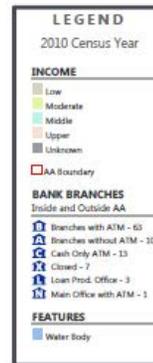
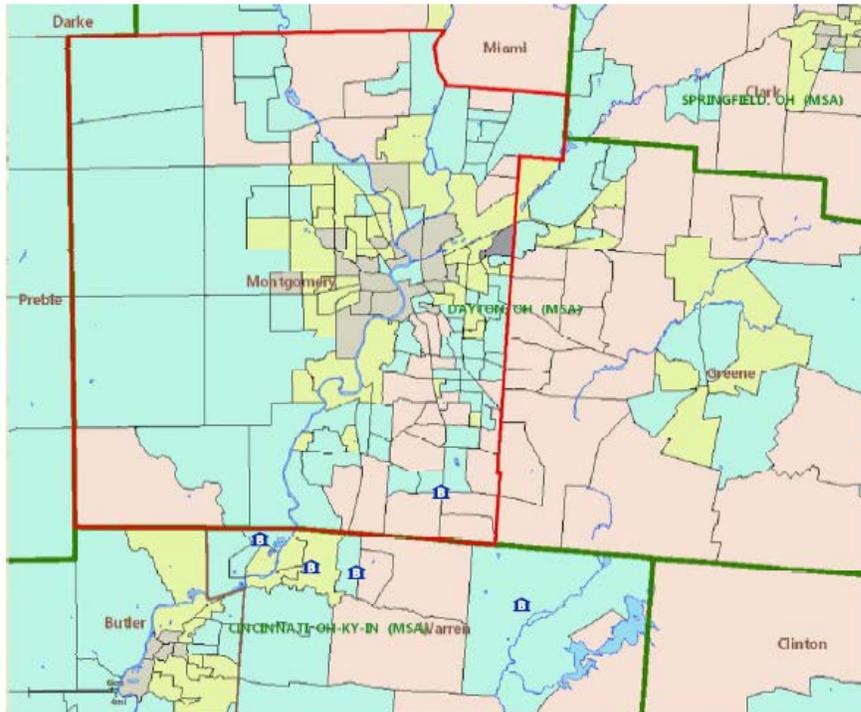
**Cleveland-Elyria OH MSA #17460**

Assessment Area: Cleveland MSA



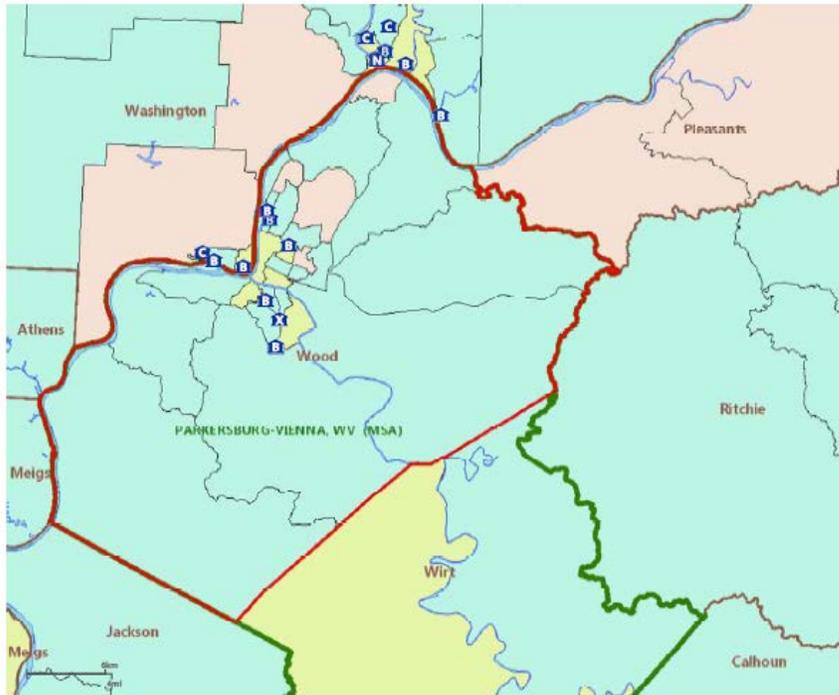
**Dayton OH MSA #19380**

Assessment Area: Dayton MSA



**Parkersburg-Vienna WV MSA #37620**

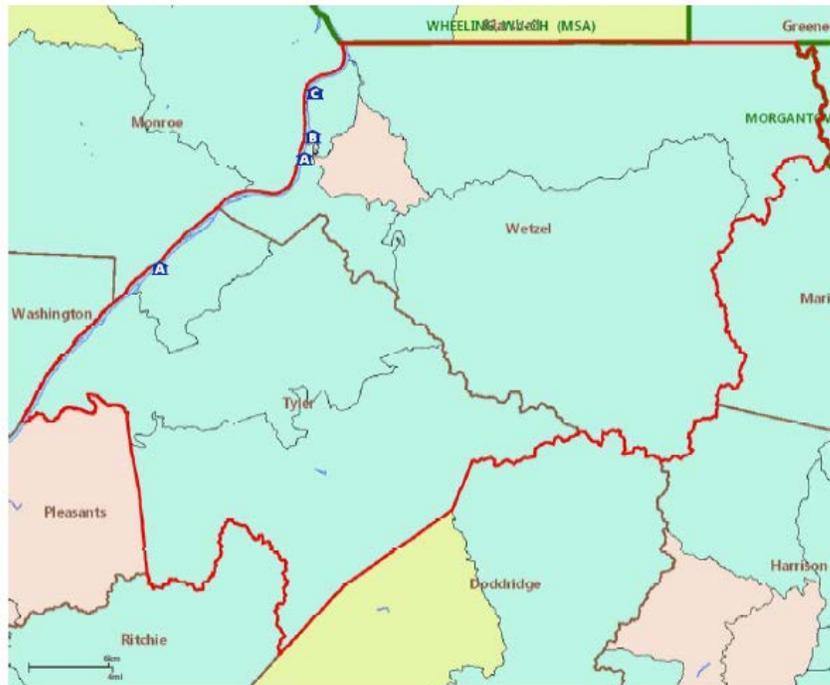
Assessment Area: Parkersburg Vienna MSA



LEGEND	
2010 Census Year	
<b>INCOME</b>	
[Light Green Box]	Low
[Yellow Box]	Moderate
[Light Blue Box]	Middle
[Orange Box]	Upper
[Grey Box]	Unknown
[Red Line]	AA Boundary
<b>BANK BRANCHES</b>	
Inside and Outside AA	
[House Icon]	Branches with ATM - 63
[Building Icon]	Branches without ATM - 39
[Cash Icon]	Cash Only ATM - 13
[Closed Door Icon]	Closed - 7
[Person Icon]	Loan Prod. Office - 3
[Person with House Icon]	Main Office with ATM - 1
<b>FEATURES</b>	
[Blue Box]	Water Body

**Non-metropolitan North WV**

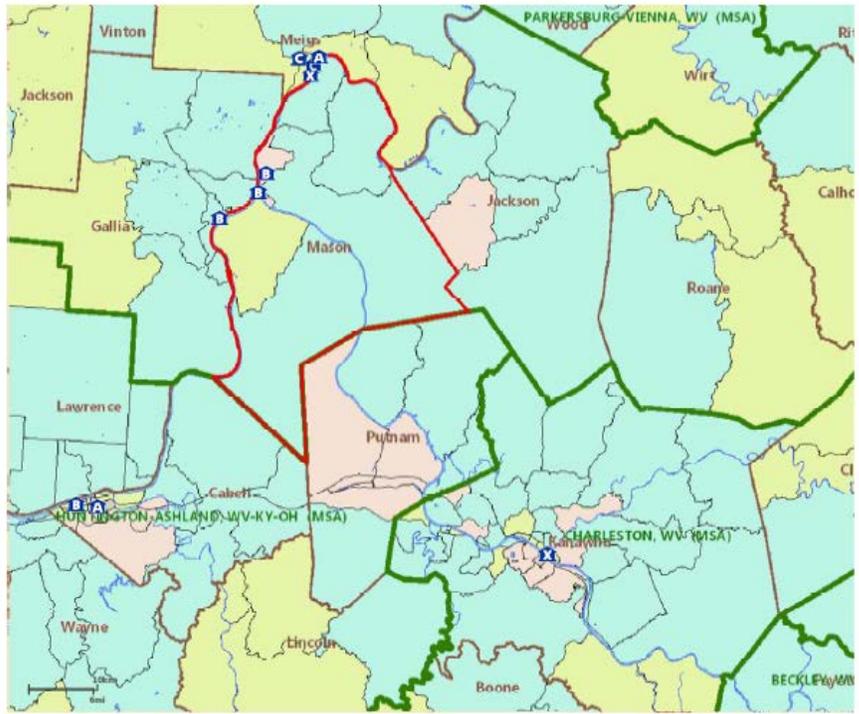
Assessment Area: West Virginia North Non MSA



LEGEND	
2010 Census Year	
<b>INCOME</b>	
[Light Green Box]	Low
[Yellow Box]	Moderate
[Light Blue Box]	Middle
[Orange Box]	Upper
[Grey Box]	Unknown
[Red Line]	AA Boundary
<b>BANK BRANCHES</b>	
Inside and Outside AA	
[House Icon]	Branches with ATM - 63
[Building Icon]	Branches without ATM - 39
[Cash Icon]	Cash Only ATM - 13
[Closed Door Icon]	Closed - 7
[Person Icon]	Loan Prod. Office - 3
[Person with House Icon]	Main Office with ATM - 1
<b>FEATURES</b>	
[Blue Box]	Water Body

### Non-metropolitan West WV

Assessment Area: West Virginia West Non MSA



LEGEND	
2010 Census Year	
<b>INCOME</b>	
[Lightest Green]	Low
[Medium Green]	Moderate
[Light Blue]	Middle
[Light Purple]	Upper
[Dark Purple]	Unknown
[Red Line]	AA Boundary
<b>BANK BRANCHES</b>	
Inside and Outside AA	
[Blue Square with 'A']	Branches with ATM - 63
[Blue Square with 'X']	Branches without ATM - 10
[Blue Square with 'C']	Cash Only ATM - 13
[Blue Square with 'Z']	Closed - 7
[Blue Square with 'L']	Loan Prod. Office - 3
[Blue Square with 'M']	Main Office with ATM - 1
<b>FEATURES</b>	
[Light Blue]	Water Body

APPENDIX D

LENDING TABLES

**Huntington-Ashland, WV KY OH MSA #26580**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group : Huntington Ashland All Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	1	2.1%	37	0.9%	10	20.8%	439	11.2%
Moderate	7	14.6%	421	10.8%	12	25.0%	1,158	29.6%
Low/Moderate Total	8	16.7%	458	11.7%	22	45.8%	1,597	40.9%
Middle	28	58.3%	2,234	57.2%	8	16.7%	592	15.2%
Upper	12	25.0%	1,214	31.1%	15	31.3%	1,565	40.1%
Unknown	0	0.0%	0	0.0%	3	6.3%	152	3.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	48	100.0%	3,906	100.0%	48	100.0%	3,906	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	4	15.4%	441	16.9%
Moderate	3	11.5%	230	8.8%	1	3.8%	56	2.1%
Low/Moderate Total	3	11.5%	230	8.8%	5	19.2%	497	19.0%
Middle	16	61.5%	1,680	64.3%	4	15.4%	35	1.3%
Upper	7	26.9%	703	26.9%	14	53.8%	1,737	66.5%
Unknown	0	0.0%	0	0.0%	3	11.5%	344	13.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	2,613	100.0%	26	100.0%	2,613	100.0%
<b>Home Improvement</b>								
Low	1	2.4%	56	1.8%	9	22.0%	383	12.3%
Moderate	2	4.9%	67	2.2%	14	34.1%	829	26.7%
Low/Moderate Total	3	7.3%	123	4.0%	23	56.1%	1,212	39.0%
Middle	25	61.0%	1,846	59.5%	6	14.6%	415	13.4%
Upper	13	31.7%	1,136	36.6%	12	29.3%	1,478	47.6%
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	41	100.0%	3,105	100.0%	41	100.0%	3,105	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>HMDA Totals</b>								
Low	2	1.7%	93	1.0%	23	20.0%	1,263	13.1%
Moderate	12	10.4%	718	7.5%	27	23.5%	2,043	21.2%
Low/Moderate Total	14	12.2%	811	8.4%	50	43.5%	3,306	34.4%
Middle	69	60.0%	5,760	59.9%	18	15.7%	1,042	10.8%
Upper	32	27.8%	3,053	31.7%	41	35.7%	4,780	49.7%
Unknown	0	0.0%	0	0.0%	6	5.2%	496	5.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	115	100.0%	9,624	100.0%	115	100.0%	9,624	100.0%

\*Information based on 2010 ACS data

**CRA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: Huntington Ashland MSA All Years

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>By Tract Income</b>												
Low	8	9.3%	1,368	10.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	28	32.6%	3,521	27.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	36	41.9%	4,889	37.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	34	39.5%	5,407	41.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	16	18.6%	2,647	20.5%	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	86	100.0%	12,943	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>By Revenue</b>												
Total \$1 Million or Less	49	57.0%	6,256	48.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	34	39.5%	6,087	47.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	3	3.5%	600	4.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	86	100.0%	12,943	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>By Loan Size</b>												
\$100,000 or less	52	60.5%	2,342	18.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	19	22.1%	3,183	24.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	15	17.4%	7,418	57.3%	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	86	100.0%	12,943	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>By Loan Size and Revenue \$1 Million or Less</b>												
\$100,000 or less	34	69.4%	1,367	21.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	10	20.4%	1,594	25.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	10.2%	3,295	52.7%	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	49	100.0%	6,256	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Non-metropolitan Central Ohio**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group : OH Central Non MSA All Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	72	10.0%	4,541	5.8%
Moderate	202	28.0%	17,664	22.7%	199	27.6%	16,281	20.9%
Low/Moderate Total	202	28.0%	17,664	22.7%	271	37.6%	20,822	26.8%
Middle	439	60.9%	49,521	63.7%	177	24.5%	18,352	23.6%
Upper	80	11.1%	10,610	13.6%	245	34.0%	35,612	45.8%
Unknown	0	0.0%	0	0.0%	28	3.9%	3,009	3.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	721	100.0%	77,795	100.0%	721	100.0%	77,795	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	42	8.5%	2,179	3.8%
Moderate	123	24.8%	13,248	23.0%	105	21.2%	8,385	14.6%
Low/Moderate Total	123	24.8%	13,248	23.0%	147	29.7%	10,564	18.4%
Middle	332	67.1%	39,118	68.0%	122	24.6%	12,564	21.8%
Upper	40	8.1%	5,201	9.0%	195	39.4%	27,399	47.6%
Unknown	0	0.0%	0	0.0%	31	6.3%	7,040	12.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	495	100.0%	57,567	100.0%	495	100.0%	57,567	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	17	9.9%	788	6.1%
Moderate	38	22.1%	2,598	20.2%	49	28.5%	2,571	20.0%
Low/Moderate Total	38	22.1%	2,598	20.2%	66	38.4%	3,359	26.1%
Middle	113	65.7%	8,875	69.1%	33	19.2%	2,312	18.0%
Upper	21	12.2%	1,374	10.7%	68	39.5%	6,773	52.7%
Unknown	0	0.0%	0	0.0%	5	2.9%	403	3.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	172	100.0%	12,847	100.0%	172	100.0%	12,847	100.0%
<b>Multi-Family</b>								
Low	1	25.0%	451	42.7%	0	0.0%	0	0.0%
Moderate	2	50.0%	357	33.8%	0	0.0%	0	0.0%
Low/Moderate Total	3	75.0%	808	76.5%	0	0.0%	0	0.0%
Middle	1	25.0%	248	23.5%	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%	4	100.0%	1,056	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,056	100.0%	4	100.0%	1,056	100.0%
<b>HMDA Totals</b>								
Low	1	0.1%	451	0.3%	131	9.4%	7,508	5.0%
Moderate	365	26.2%	33,867	22.7%	353	25.4%	27,237	18.2%
Low/Moderate Total	366	26.3%	34,318	23.0%	484	34.8%	34,745	23.3%
Middle	885	63.6%	97,762	65.5%	332	23.9%	33,228	22.3%
Upper	141	10.1%	17,185	11.5%	508	36.5%	69,784	46.8%
Unknown	0	0.0%	0	0.0%	68	4.9%	11,508	7.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,392	100.0%	149,265	100.0%	1,392	100.0%	149,265	100.0%

\*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: Ohio Central Non MSA All Years

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>By Tract Income</b>												
Low	5	0.8%	498	0.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	209	33.3%	23,008	32.1%	4	30.8%	219	28.8%	0	0.0%	0	0.0%
Low/Moderate Total	214	34.1%	23,506	32.8%	4	30.8%	219	28.8%	0	0.0%	0	0.0%
Middle	370	58.9%	42,555	59.4%	9	69.2%	541	71.2%	0	0.0%	0	0.0%
Upper	44	7.0%	5,632	7.9%	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	628	100.0%	71,693	100.0%	13	100.0%	760	100.0%	0	0.0%	0	0.0%
<b>By Revenue</b>												
Total \$1 Million or Less	387	61.6%	24,673	34.4%	13	100.0%	760	100.0%	0	0.0%	0	0.0%
Over \$1 Million	233	37.1%	45,175	63.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	8	1.3%	1,845	2.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	628	100.0%	71,693	100.0%	13	100.0%	760	100.0%	0	0.0%	0	0.0%
<b>By Loan Size</b>												
\$100,000 or less	438	69.7%	17,021	23.7%	9	69.2%	253	33.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	110	17.5%	17,649	24.6%	4	30.8%	507	66.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	80	12.7%	37,023	51.6%	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	628	100.0%	71,693	100.0%	13	100.0%	760	100.0%	0	0.0%	0	0.0%
<b>By Loan Size and Revenue \$1 Million or Less</b>												
\$100,000 or less	321	82.9%	11,225	45.5%	9	69.2%	253	33.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	52	13.4%	7,747	31.4%	4	30.8%	507	66.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	14	3.6%	5,701	23.1%	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	387	100.0%	24,673	100.0%	13	100.0%	760	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Cincinnati OH-KY-IN MSA #17140**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group : Cincinnati All Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	7	18.4%	463	7.7%
Moderate	2	5.3%	194	3.2%	11	28.9%	1,221	20.2%
Low/Moderate Total	2	5.3%	194	3.2%	18	47.4%	1,684	27.9%
Middle	31	81.6%	4,822	79.9%	10	26.3%	1,265	21.0%
Upper	5	13.2%	1,022	16.9%	6	15.8%	1,337	22.1%
Unknown	0	0.0%	0	0.0%	4	10.5%	1,752	29.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	6,038	100.0%	38	100.0%	6,038	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	9	22.5%	636	14.8%
Moderate	5	12.5%	367	8.5%	11	27.5%	955	22.2%
Low/Moderate Total	5	12.5%	367	8.5%	20	50.0%	1,591	37.0%
Middle	31	77.5%	3,415	79.4%	10	25.0%	1,449	33.7%
Upper	4	10.0%	518	12.0%	8	20.0%	1,107	25.7%
Unknown	0	0.0%	0	0.0%	2	5.0%	153	3.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	40	100.0%	4,300	100.0%	40	100.0%	4,300	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	3	27.3%	123	10.8%
Moderate	1	9.1%	280	24.5%	2	18.2%	183	16.0%
Low/Moderate Total	1	9.1%	280	24.5%	5	45.5%	306	26.8%
Middle	7	63.6%	278	24.4%	4	36.4%	155	13.6%
Upper	3	27.3%	583	51.1%	2	18.2%	680	59.6%
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	11	100.0%	1,141	100.0%	11	100.0%	1,141	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	19	21.3%	1,222	10.6%
Moderate	8	9.0%	841	7.3%	24	27.0%	2,359	20.6%
Low/Moderate Total	8	9.0%	841	7.3%	43	48.3%	3,581	31.2%
Middle	69	77.5%	8,515	74.2%	24	27.0%	2,869	25.0%
Upper	12	13.5%	2,123	18.5%	16	18.0%	3,124	27.2%
Unknown	0	0.0%	0	0.0%	6	6.7%	1,905	16.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	89	100.0%	11,479	100.0%	89	100.0%	11,479	100.0%

\*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: Cincinnati All Years

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	7.5%	1,332	11.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	6	7.5%	1,332	11.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	47	58.8%	4,650	40.8%	25	83.3%	3,344	93.1%	0	0.0%	0	0.0%
Upper	27	33.8%	5,421	47.5%	5	16.7%	249	6.9%	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	80	100.0%	11,403	100.0%	30	100.0%	3,593	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>											
Total \$1 Million or Less	41	51.3%	2,210	19.4%	23	76.7%	1,933	53.8%	0	0.0%	0	0.0%
Over \$1 Million	39	48.8%	9,193	80.6%	6	20.0%	1,550	43.1%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	1	3.3%	110	3.1%	0	0.0%	0	0.0%
Total	80	100.0%	11,403	100.0%	30	100.0%	3,593	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>											
\$100,000 or less	50	62.5%	2,117	18.6%	19	63.3%	808	22.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	13	16.3%	1,838	16.1%	8	26.7%	1,425	39.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	17	21.3%	7,448	65.3%	3	10.0%	1,360	37.9%	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	80	100.0%	11,403	100.0%	30	100.0%	3,593	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>											
\$100,000 or less	37	90.2%	1,335	60.4%	17	73.9%	708	36.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	7.3%	405	18.3%	5	21.7%	865	44.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	2.4%	470	21.3%	1	4.3%	360	18.6%	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	41	100.0%	2,210	100.0%	23	100.0%	1,933	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Columbus OH MSA #18140**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group :All Assessment Areas

Income Categories	HMDA							
	#	By Tract Income			By Borrower Income			
		%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	1	1.1%	58	0.5%	27	30.0%	1,979	18.5%
Moderate	33	36.7%	3,134	29.4%	23	25.6%	2,366	22.2%
Low/Moderate Total	34	37.8%	3,192	29.9%	50	55.6%	4,345	40.7%
Middle	48	53.3%	6,327	59.3%	21	23.3%	2,645	24.8%
Upper	8	8.9%	1,153	10.8%	16	17.8%	3,023	28.3%
Unknown	0	0.0%	0	0.0%	3	3.3%	659	6.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	90	100.0%	10,672	100.0%	90	100.0%	10,672	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	8	18.2%	484	9.6%
Moderate	14	31.8%	1,389	27.6%	8	18.2%	763	15.2%
Low/Moderate Total	14	31.8%	1,389	27.6%	16	36.4%	1,247	24.8%
Middle	28	63.6%	3,400	67.5%	12	27.3%	1,444	28.7%
Upper	2	4.5%	247	4.9%	13	29.5%	1,886	37.5%
Unknown	0	0.0%	0	0.0%	3	6.8%	459	9.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	5,036	100.0%	44	100.0%	5,036	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	5	35.7%	329	35.8%
Moderate	4	28.6%	227	24.7%	3	21.4%	153	16.6%
Low/Moderate Total	4	28.6%	227	24.7%	8	57.1%	482	52.4%
Middle	8	57.1%	500	54.3%	5	35.7%	413	44.9%
Upper	2	14.3%	193	21.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	7.1%	25	2.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	920	100.0%	14	100.0%	920	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	150	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%	1	100.0%	150	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	150	100.0%	1	100.0%	150	100.0%
<b>HMDA Totals</b>								
Low	1	0.7%	58	0.3%	40	26.8%	2,792	16.6%
Moderate	51	34.2%	4,750	28.3%	34	22.8%	3,282	19.6%
Low/Moderate Total	52	34.9%	4,808	28.7%	74	49.7%	6,074	36.2%
Middle	85	57.0%	10,377	61.8%	38	25.5%	4,502	26.8%
Upper	12	8.1%	1,593	9.5%	29	19.5%	4,909	29.3%
Unknown	0	0.0%	0	0.0%	8	5.4%	1,293	7.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	149	100.0%	16,778	100.0%	149	100.0%	16,778	100.0%

\*Information based on 2010 ACS data

**CRA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: All Assessment Areas

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>											
Low	3	1.9%	461	2.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	59	37.8%	8,892	41.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	62	39.7%	9,353	43.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	79	50.6%	10,234	47.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	15	9.6%	1,921	8.9%	2	100.0%	70	100.0%	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	156	100.0%	21,508	100.0%	2	100.0%	70	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>											
Total \$1 Million or Less	87	55.8%	8,333	38.7%	2	100.0%	70	100.0%	0	0.0%	0	0.0%
Over \$1 Million	67	42.9%	12,908	60.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	2	1.3%	267	1.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	156	100.0%	21,508	100.0%	2	100.0%	70	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>											
\$100,000 or less	101	64.7%	4,371	20.3%	2	100.0%	70	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	29	18.6%	5,365	24.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	26	16.7%	11,772	54.7%	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	156	100.0%	21,508	100.0%	2	100.0%	70	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>											
\$100,000 or less	67	77.0%	2,705	32.5%	2	100.0%	70	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	12	13.8%	2,096	25.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	9.2%	3,532	42.4%	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	87	100.0%	8,333	100.0%	2	100.0%	70	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Non-metropolitan Southeastern Ohio**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group : OH SE Non MSA All Years

Income Categories	HMDA							
	#	By Tract Income %	\$ (000s)	%	#	By Borrower Income %	\$ (000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	3	12.0%	142	6.6%
Moderate	1	4.0%	47	2.2%	10	40.0%	762	35.2%
Low/Moderate Total	1	4.0%	47	2.2%	13	52.0%	904	41.8%
Middle	22	88.0%	1,948	90.1%	5	20.0%	584	27.0%
Upper	2	8.0%	167	7.7%	5	20.0%	525	24.3%
Unknown	0	0.0%	0	0.0%	2	8.0%	149	6.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	2,162	100.0%	25	100.0%	2,162	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	3	13.0%	111	4.3%
Moderate	0	0.0%	0	0.0%	6	26.1%	564	22.0%
Low/Moderate Total	0	0.0%	0	0.0%	9	39.1%	675	26.3%
Middle	21	91.3%	2,340	91.3%	6	26.1%	603	23.5%
Upper	2	8.7%	223	8.7%	7	30.4%	1,021	39.8%
Unknown	0	0.0%	0	0.0%	1	4.3%	264	10.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	2,563	100.0%	23	100.0%	2,563	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	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%	225	100.0%	1	50.0%	45	20.0%
Upper	0	0.0%	0	0.0%	1	50.0%	180	80.0%
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	2	100.0%	225	100.0%	2	100.0%	225	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	6	12.0%	253	5.1%
Moderate	1	2.0%	47	0.9%	16	32.0%	1,326	26.8%
Low/Moderate Total	1	2.0%	47	0.9%	22	44.0%	1,579	31.9%
Middle	45	90.0%	4,513	91.2%	12	24.0%	1,232	24.9%
Upper	4	8.0%	390	7.9%	13	26.0%	1,726	34.9%
Unknown	0	0.0%	0	0.0%	3	6.0%	413	8.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	50	100.0%	4,950	100.0%	50	100.0%	4,950	100.0%

\*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: Ohio SE Non MSA All Years

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	4.0%	628	20.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	2	4.0%	628	20.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	41	82.0%	1,954	64.9%	31	68.9%	1,846	67.1%	0	0.0%	0	0.0%
Upper	7	14.0%	427	14.2%	14	31.1%	904	32.9%	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	50	100.0%	3,009	100.0%	45	100.0%	2,750	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>											
Total \$1 Million or Less	38	76.0%	1,583	52.6%	44	97.8%	2,600	94.5%	0	0.0%	0	0.0%
Over \$1 Million	9	18.0%	936	31.1%	1	2.2%	150	5.5%	0	0.0%	0	0.0%
Not Known	3	6.0%	490	16.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	50	100.0%	3,009	100.0%	45	100.0%	2,750	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>											
\$100,000 or less	44	88.0%	1,558	51.8%	37	82.2%	1,400	50.9%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	6.0%	550	18.3%	8	17.8%	1,350	49.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	6.0%	901	29.9%	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	50	100.0%	3,009	100.0%	45	100.0%	2,750	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>											
\$100,000 or less	36	94.7%	1,178	74.4%	37	84.1%	1,400	53.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	5.3%	405	25.6%	7	15.9%	1,200	46.2%	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	38	100.0%	1,583	100.0%	44	100.0%	2,600	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Akron OH MSA #10420**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group : Akron All Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	1	3.7%	26	0.7%	1	3.7%	105	2.7%
Moderate	5	18.5%	252	6.5%	7	25.9%	764	19.7%
Low/Moderate Total	6	22.2%	278	7.2%	8	29.6%	869	22.4%
Middle	10	37.0%	1,241	32.0%	4	14.8%	421	10.9%
Upper	11	40.7%	2,359	60.8%	11	40.7%	2,392	61.7%
Unknown	0	0.0%	0	0.0%	4	14.8%	196	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	3,878	100.0%	27	100.0%	3,878	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	4	8.5%	322	5.2%
Moderate	6	12.8%	577	9.2%	10	21.3%	1,040	16.7%
Low/Moderate Total	6	12.8%	577	9.2%	14	29.8%	1,362	21.8%
Middle	21	44.7%	2,300	36.9%	13	27.7%	1,361	21.8%
Upper	20	42.6%	3,364	53.9%	20	42.6%	3,518	56.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	47	100.0%	6,241	100.0%	47	100.0%	6,241	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	37.5%	298	27.5%	3	37.5%	250	23.1%
Low/Moderate Total	3	37.5%	298	27.5%	3	37.5%	250	23.1%
Middle	0	0.0%	0	0.0%	3	37.5%	369	34.1%
Upper	5	62.5%	784	72.5%	2	25.0%	463	42.8%
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	8	100.0%	1,082	100.0%	8	100.0%	1,082	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>HMDA Totals</b>								
Low	1	1.2%	26	0.2%	5	6.1%	427	3.8%
Moderate	14	17.1%	1,127	10.1%	20	24.4%	2,054	18.3%
Low/Moderate Total	15	18.3%	1,153	10.3%	25	30.5%	2,481	22.1%
Middle	31	37.8%	3,541	31.6%	20	24.4%	2,151	19.2%
Upper	36	43.9%	6,507	58.1%	33	40.2%	6,373	56.9%
Unknown	0	0.0%	0	0.0%	4	4.9%	196	1.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	82	100.0%	11,201	100.0%	82	100.0%	11,201	100.0%

\*Information based on 2010 ACS data

**CRA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: Akron All Years

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>By Tract Income</b>												
Low	4	17.4%	205	4.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	26.1%	862	17.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	10	43.5%	1,067	21.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	5	21.7%	1,285	25.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	8	34.8%	2,644	52.9%	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	23	100.0%	4,996	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>By Revenue</b>												
Total \$1 Million or Less	11	47.8%	1,620	32.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	12	52.2%	3,376	67.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	4,996	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>By Loan Size</b>												
\$100,000 or less	9	39.1%	286	5.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	13.0%	605	12.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	11	47.8%	4,105	82.2%	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	23	100.0%	4,996	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>By Loan Size and Revenue \$1 Million or Less</b>												
\$100,000 or less	7	63.6%	225	13.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	9.1%	105	6.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	27.3%	1,290	79.6%	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	11	100.0%	1,620	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Cleveland-Elyria OH MSA #17460**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group : Cleveland All Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	11.1%	82	5.3%
Low/Moderate Total	0	0.0%	0	0.0%	1	11.1%	82	5.3%
Middle	5	55.6%	536	35.0%	1	11.1%	89	5.8%
Upper	4	44.4%	997	65.0%	4	44.4%	886	57.8%
Unknown	0	0.0%	0	0.0%	3	33.3%	476	31.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	1,533	100.0%	9	100.0%	1,533	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	165	59.6%	0	0.0%	0	0.0%
Upper	1	50.0%	112	40.4%	1	50.0%	165	59.6%
Unknown	0	0.0%	0	0.0%	1	50.0%	112	40.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	277	100.0%	2	100.0%	277	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	80.0%	2,884	71.5%	0	0.0%	0	0.0%
Upper	1	20.0%	1,148	28.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	4,032	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	4,032	100.0%	5	100.0%	4,032	100.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	6.3%	82	1.4%
Low/Moderate Total	0	0.0%	0	0.0%	1	6.3%	82	1.4%
Middle	10	62.5%	3,585	61.4%	1	6.3%	89	1.5%
Upper	6	37.5%	2,257	38.6%	5	31.3%	1,051	18.0%
Unknown	0	0.0%	0	0.0%	9	56.3%	4,620	79.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	5,842	100.0%	16	100.0%	5,842	100.0%

\*Information based on 2010 ACS data

**CRA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: Cleveland MSA All Years

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>											
Low	7	8.5%	3,284	10.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	17	20.7%	6,322	19.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	24	29.3%	9,606	29.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	32	39.0%	12,678	38.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	26	31.7%	10,422	31.9%	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	82	100.0%	32,706	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>											
Total \$1 Million or Less	31	37.8%	9,716	29.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	50	61.0%	22,206	67.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	1	1.2%	784	2.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	82	100.0%	32,706	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>											
\$100,000 or less	10	12.2%	432	1.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	16	19.5%	2,775	8.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	56	68.3%	29,499	90.2%	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	82	100.0%	32,706	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>											
\$100,000 or less	7	22.6%	293	3.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	9	29.0%	1,602	16.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	15	48.4%	7,821	80.5%	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	31	100.0%	9,716	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Dayton OH MSA #19380**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group : Dayton All Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	3	15.8%	196	8.7%
Moderate	2	10.5%	105	4.7%	6	31.6%	495	22.1%
Low/Moderate Total	2	10.5%	105	4.7%	9	47.4%	691	30.8%
Middle	9	47.4%	887	39.6%	4	21.1%	420	18.7%
Upper	8	42.1%	1,249	55.7%	5	26.3%	830	37.0%
Unknown	0	0.0%	0	0.0%	1	5.3%	300	13.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	2,241	100.0%	19	100.0%	2,241	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	1	33.3%	74	22.9%
Moderate	1	33.3%	124	38.4%	0	0.0%	0	0.0%
Low/Moderate Total	1	33.3%	124	38.4%	1	33.3%	74	22.9%
Middle	1	33.3%	74	22.9%	2	66.7%	249	77.1%
Upper	1	33.3%	125	38.7%	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	3	100.0%	323	100.0%	3	100.0%	323	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	150	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%	1	100.0%	150	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	150	100.0%	1	100.0%	150	100.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	4	17.4%	270	9.9%
Moderate	3	13.0%	229	8.4%	6	26.1%	495	18.2%
Low/Moderate Total	3	13.0%	229	8.4%	10	43.5%	765	28.2%
Middle	11	47.8%	1,111	40.9%	6	26.1%	669	24.6%
Upper	9	39.1%	1,374	50.6%	5	21.7%	830	30.6%
Unknown	0	0.0%	0	0.0%	2	8.7%	450	16.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	2,714	100.0%	23	100.0%	2,714	100.0%

\*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: Dayton MSA All Years

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>By Tract Income</b>												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	41.7%	1,052	29.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	5	41.7%	1,052	29.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	5	41.7%	1,840	51.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	16.7%	650	18.4%	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%	3,542	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>By Revenue</b>												
Total \$1 Million or Less	9	75.0%	1,944	54.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	3	25.0%	1,598	45.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	3,542	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>By Loan Size</b>												
\$100,000 or less	4	33.3%	224	6.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	25.0%	620	17.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	41.7%	2,698	76.2%	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%	3,542	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>By Loan Size and Revenue \$1 Million or Less</b>												
\$100,000 or less	4	44.4%	224	11.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	33.3%	620	31.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	22.2%	1,100	56.6%	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	9	100.0%	1,944	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Parkersburg-Vienna WV MSA #37620**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group : Parkersburg Vienna MSA All Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	14	6.7%	820	3.2%
Moderate	21	10.0%	1,754	6.8%	53	25.2%	4,740	18.4%
Low/Moderate Total	21	10.0%	1,754	6.8%	67	31.9%	5,560	21.6%
Middle	145	69.0%	17,672	68.6%	49	23.3%	5,385	20.9%
Upper	44	21.0%	6,332	24.6%	87	41.4%	14,101	54.7%
Unknown	0	0.0%	0	0.0%	7	3.3%	712	2.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	210	100.0%	25,758	100.0%	210	100.0%	25,758	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	9	5.7%	487	2.7%
Moderate	15	9.6%	1,021	5.6%	30	19.1%	2,380	13.1%
Low/Moderate Total	15	9.6%	1,021	5.6%	39	24.8%	2,867	15.7%
Middle	117	74.5%	13,786	75.6%	47	29.9%	4,235	23.2%
Upper	25	15.9%	3,422	18.8%	67	42.7%	10,353	56.8%
Unknown	0	0.0%	0	0.0%	4	2.5%	774	4.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	157	100.0%	18,229	100.0%	157	100.0%	18,229	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	5	12.8%	198	5.4%
Moderate	5	12.8%	254	6.9%	7	17.9%	371	10.1%
Low/Moderate Total	5	12.8%	254	6.9%	12	30.8%	569	15.5%
Middle	28	71.8%	2,880	78.6%	9	23.1%	747	20.4%
Upper	6	15.4%	532	14.5%	18	46.2%	2,350	64.1%
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	39	100.0%	3,666	100.0%	39	100.0%	3,666	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	100.0%	985	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	985	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	985	100.0%	3	100.0%	985	100.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	28	6.8%	1,505	3.1%
Moderate	41	10.0%	3,029	6.2%	90	22.0%	7,491	15.4%
Low/Moderate Total	41	10.0%	3,029	6.2%	118	28.9%	8,996	18.5%
Middle	293	71.6%	35,323	72.6%	105	25.7%	10,367	21.3%
Upper	75	18.3%	10,286	21.1%	172	42.1%	26,804	55.1%
Unknown	0	0.0%	0	0.0%	14	3.4%	2,471	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	409	100.0%	48,638	100.0%	409	100.0%	48,638	100.0%

\*Information based on 2010 ACS data

**CRA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: Parkersburg Vienna MSA All Years

Income Categories	SMALL BUSINESS				SMALL FARM			SMALL BUS. SECURED BY REAL ESTATE				
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	18	17.6%	4,127	23.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	18	17.6%	4,127	23.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	82	80.4%	13,079	74.5%	1	100.0%	100	100.0%	0	0.0%	0	0.0%
Upper	2	2.0%	360	2.0%	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	102	100.0%	17,566	100.0%	1	100.0%	100	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>											
Total \$1 Million or Less	56	54.9%	4,627	26.3%	1	100.0%	100	100.0%	0	0.0%	0	0.0%
Over \$1 Million	45	44.1%	12,771	72.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	1	1.0%	168	1.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	102	100.0%	17,566	100.0%	1	100.0%	100	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>											
\$100,000 or less	61	59.8%	2,509	14.3%	1	100.0%	100	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	16	15.7%	2,477	14.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	25	24.5%	12,580	71.6%	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	102	100.0%	17,566	100.0%	1	100.0%	100	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>											
\$100,000 or less	43	76.8%	1,596	34.5%	1	100.0%	100	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	8	14.3%	1,130	24.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	8.9%	1,901	41.1%	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	56	100.0%	4,627	100.0%	1	100.0%	100	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Non-metropolitan North WV**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group :All Assessment Areas

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	2	8.0%	93	4.1%
Moderate	0	0.0%	0	0.0%	7	28.0%	549	24.4%
Low/Moderate Total	0	0.0%	0	0.0%	9	36.0%	642	28.6%
Middle	24	96.0%	2,101	93.5%	7	28.0%	717	31.9%
Upper	1	4.0%	146	6.5%	9	36.0%	888	39.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	2,247	100.0%	25	100.0%	2,247	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	2	25.0%	105	19.5%
Moderate	0	0.0%	0	0.0%	1	12.5%	35	6.5%
Low/Moderate Total	0	0.0%	0	0.0%	3	37.5%	140	26.0%
Middle	8	100.0%	539	100.0%	1	12.5%	106	19.7%
Upper	0	0.0%	0	0.0%	4	50.0%	293	54.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	539	100.0%	8	100.0%	539	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	1	10.0%	10	1.4%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	10.0%	10	1.4%
Middle	8	80.0%	551	78.6%	2	20.0%	217	31.0%
Upper	2	20.0%	150	21.4%	6	60.0%	356	50.8%
Unknown	0	0.0%	0	0.0%	1	10.0%	118	16.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	701	100.0%	10	100.0%	701	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	135	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	135	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	135	100.0%	1	100.0%	135	100.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	5	11.4%	208	5.7%
Moderate	0	0.0%	0	0.0%	8	18.2%	584	16.1%
Low/Moderate Total	0	0.0%	0	0.0%	13	29.5%	792	21.9%
Middle	40	90.9%	3,191	88.1%	10	22.7%	1,040	28.7%
Upper	4	9.1%	431	11.9%	19	43.2%	1,537	42.4%
Unknown	0	0.0%	0	0.0%	2	4.5%	253	7.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	3,622	100.0%	44	100.0%	3,622	100.0%

\*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: WV North Non MSA All Years

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>											
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	10	100.0%	662	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	10	100.0%	662	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>											
Total \$1 Million or Less	3	30.0%	25	3.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	7	70.0%	637	96.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	662	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>											
\$100,000 or less	8	80.0%	261	39.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	20.0%	401	60.6%	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%	662	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>											
\$100,000 or less	3	100.0%	25	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%	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	3	100.0%	25	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Non-metropolitan West WV**

**HMDA Loan Distribution Table**

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group : West Virginia West Non MSA All Years

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	15.4%	289	20.5%	3	23.1%	321	22.7%
Low/Moderate Total	2	15.4%	289	20.5%	3	23.1%	321	22.7%
Middle	4	30.8%	378	26.8%	5	38.5%	526	37.3%
Upper	7	53.8%	744	52.7%	5	38.5%	564	40.0%
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	13	100.0%	1,411	100.0%	13	100.0%	1,411	100.0%
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	1	4.5%	44	2.4%
Moderate	2	9.1%	143	7.7%	7	31.8%	507	27.1%
Low/Moderate Total	2	9.1%	143	7.7%	8	36.4%	551	29.5%
Middle	16	72.7%	1,367	73.1%	6	27.3%	480	25.7%
Upper	4	18.2%	359	19.2%	6	27.3%	623	33.3%
Unknown	0	0.0%	0	0.0%	2	9.1%	215	11.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	1,869	100.0%	22	100.0%	1,869	100.0%
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	14.3%	38	10.2%	1	14.3%	30	8.1%
Low/Moderate Total	1	14.3%	38	10.2%	1	14.3%	30	8.1%
Middle	6	85.7%	334	89.8%	4	57.1%	112	30.1%
Upper	0	0.0%	0	0.0%	2	28.6%	230	61.8%
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	7	100.0%	372	100.0%	7	100.0%	372	100.0%
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	1	2.4%	44	1.2%
Moderate	5	11.9%	470	12.9%	11	26.2%	858	23.5%
Low/Moderate Total	5	11.9%	470	12.9%	12	28.6%	902	24.7%
Middle	26	61.9%	2,079	56.9%	15	35.7%	1,118	30.6%
Upper	11	26.2%	1,103	30.2%	13	31.0%	1,417	38.8%
Unknown	0	0.0%	0	0.0%	2	4.8%	215	5.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	3,652	100.0%	42	100.0%	3,652	100.0%

\*Information based on 2010 ACS data

CRA Loan Distribution Table

Exam: Peoples Bank Marietta, Initial

Assessment Area/Group: WV West Non MSA All Years

Income Categories	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>											
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	16.7%	131	9.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	4	16.7%	131	9.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	6	25.0%	277	20.3%	1	100.0%	126	100.0%	0	0.0%	0	0.0%
Upper	14	58.3%	956	70.1%	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	24	100.0%	1,364	100.0%	1	100.0%	126	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>											
Total \$1 Million or Less	20	83.3%	1,009	74.0%	1	100.0%	126	100.0%	0	0.0%	0	0.0%
Over \$1 Million	4	16.7%	355	26.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	1,364	100.0%	1	100.0%	126	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>											
\$100,000 or less	20	83.3%	761	55.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	16.7%	603	44.2%	1	100.0%	126	100.0%	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	24	100.0%	1,364	100.0%	1	100.0%	126	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>											
\$100,000 or less	18	90.0%	654	64.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	10.0%	355	35.2%	1	100.0%	126	100.0%	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	20	100.0%	1,009	100.0%	1	100.0%	126	100.0%	0	0.0%	0	0.0%

\*Information based on 2010 ACS data

**Huntington-Ashland, WV KY OH MSA #26580**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Huntington Ashland MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	34	1.69%	2,847	1.12%	136	6.77%	8,328	3.26%
Moderate	177	8.81%	15,930	6.24%	351	17.46%	29,776	11.67%
<i>Low/Moderate Total</i>	<i>211</i>	<i>10.5%</i>	<i>18,777</i>	<i>7.36%</i>	<i>487</i>	<i>24.23%</i>	<i>38,104</i>	<i>14.93%</i>
Middle	1,114	55.42%	137,923	54.03%	474	23.58%	55,319	21.67%
Upper	685	34.08%	98,555	38.61%	738	36.72%	124,410	48.74%
Unknown	0	0.0%	0	0.0%	311	15.47%	37,422	14.66%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>2,010</b>	<b>100.0%</b>	<b>255,255</b>	<b>100.0%</b>	<b>2,010</b>	<b>100.0%</b>	<b>255,255</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	30	2.05%	3,020	1.72%	103	7.04%	5,890	3.35%
Moderate	118	8.06%	10,276	5.85%	196	13.39%	15,294	8.7%
<i>Low/Moderate Total</i>	<i>148</i>	<i>10.11%</i>	<i>13,296</i>	<i>7.57%</i>	<i>299</i>	<i>20.42%</i>	<i>21,184</i>	<i>12.05%</i>
Middle	841	57.45%	102,332	58.23%	284	19.4%	29,324	16.69%
Upper	475	32.45%	60,102	34.2%	633	43.24%	92,566	52.68%
Unknown	0	0.0%	0	0.0%	248	16.94%	32,656	18.58%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>1,464</b>	<b>100.0%</b>	<b>175,730</b>	<b>100.0%</b>	<b>1,464</b>	<b>100.0%</b>	<b>175,730</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	8	1.77%	280	1.05%	31	6.86%	769	2.89%
Moderate	38	8.41%	4,040	15.17%	95	21.02%	3,099	11.63%
<i>Low/Moderate Total</i>	<i>46</i>	<i>10.18%</i>	<i>4,320</i>	<i>16.22%</i>	<i>126</i>	<i>27.88%</i>	<i>3,868</i>	<i>14.52%</i>
Middle	282	62.39%	15,184	57.0%	85	18.81%	3,843	14.43%
Upper	124	27.43%	7,134	26.78%	227	50.22%	16,243	60.98%
Unknown	0	0.0%	0	0.0%	14	3.1%	2,684	10.08%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>452</b>	<b>100.0%</b>	<b>26,638</b>	<b>100.0%</b>	<b>452</b>	<b>100.0%</b>	<b>26,638</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	6	18.75%	2,502	5.1%	0	0.0%	0	0.0%
Moderate	9	28.13%	7,385	15.06%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>15</i>	<i>46.88%</i>	<i>9,887</i>	<i>20.16%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	11	34.38%	25,883	52.78%	0	0.0%	0	0.0%
Upper	6	18.75%	13,268	27.06%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	32	100.0%	49,038	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>49,038</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>49,038</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	78	1.97%	8,649	1.71%	270	6.82%	14,987	2.96%
Moderate	342	8.64%	37,631	7.43%	642	16.22%	48,169	9.51%
<i>Low/Moderate Total</i>	<i>420</i>	<i>10.61%</i>	<i>46,280</i>	<i>9.13%</i>	<i>912</i>	<i>23.04%</i>	<i>63,156</i>	<i>12.47%</i>
Middle	2,248	56.8%	281,322	55.52%	843	21.3%	88,486	17.46%
Upper	1,290	32.59%	179,059	35.34%	1,598	40.37%	233,219	46.03%
Unknown	0	0.0%	0	0.0%	605	15.29%	121,800	24.04%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>3,958</b>	<b>100.0%</b>	<b>506,661</b>	<b>100.0%</b>	<b>3,958</b>	<b>100.0%</b>	<b>506,661</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Huntington Ashland MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	204	11.62%	9,871	11.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	346	19.7%	24,756	29.59%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	550	31.32%	34,627	41.39%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	653	37.19%	29,135	34.82%	12	70.59%	246	90.77%	0	0.0%	0	0.0%
Upper	500	28.47%	19,471	23.27%	2	11.76%	7	2.58%	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	53	3.02%	437	0.52%	3	17.65%	18	6.64%	0	0.0%	0	0.0%
<b>Total</b>	<b>1,756</b>	<b>100%</b>	<b>83,670</b>	<b>100%</b>	<b>17</b>	<b>100%</b>	<b>271</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>				<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	768	43.74%	31,632	37.81%	8	47.06%	205	75.65%	0	0.0%	0	0.0%
	<b>By Loan Size</b>				<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	1,596	90.89%	27,142	32.44%	17	100.0%	271	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	84	4.78%	14,855	17.75%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	76	4.33%	41,673	49.81%	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%
<b>Total</b>	<b>1,756</b>	<b>100%</b>	<b>83,670</b>	<b>100%</b>	<b>17</b>	<b>100%</b>	<b>271</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Non-metropolitan Central Ohio**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Ohio Central Non MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	21	0.4%	1,724	0.26%	373	7.08%	25,006	3.83%
Moderate	1,240	23.55%	122,542	18.78%	1,172	22.26%	108,436	16.62%
<i>Low/Moderate Total</i>	<i>1,261</i>	<i>23.95%</i>	<i>124,266</i>	<i>19.04%</i>	<i>1,545</i>	<i>29.34%</i>	<i>133,442</i>	<i>20.45%</i>
Middle	3,295	62.58%	423,334	64.87%	1,332	25.3%	155,886	23.89%
Upper	709	13.47%	104,939	16.08%	1,578	29.97%	271,507	41.61%
Unknown	0	0.0%	0	0.0%	810	15.38%	91,704	14.05%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>5,265</b>	<b>100.0%</b>	<b>652,539</b>	<b>100.0%</b>	<b>5,265</b>	<b>100.0%</b>	<b>652,539</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	15	0.47%	715	0.19%	227	7.15%	14,821	3.91%
Moderate	679	21.4%	64,441	17.02%	521	16.42%	44,356	11.72%
<i>Low/Moderate Total</i>	<i>694</i>	<i>21.87%</i>	<i>65,156</i>	<i>17.21%</i>	<i>748</i>	<i>23.57%</i>	<i>59,177</i>	<i>15.63%</i>
Middle	2,106	66.37%	261,742	69.13%	724	22.82%	75,589	19.96%
Upper	373	11.76%	51,724	13.66%	1,134	35.74%	167,143	44.15%
Unknown	0	0.0%	0	0.0%	567	17.87%	76,713	20.26%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>3,173</b>	<b>100.0%</b>	<b>378,622</b>	<b>100.0%</b>	<b>3,173</b>	<b>100.0%</b>	<b>378,622</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	2	0.28%	63	0.07%	82	11.45%	2,124	2.34%
Moderate	185	25.84%	10,289	11.36%	154	21.51%	5,047	5.57%
<i>Low/Moderate Total</i>	<i>187</i>	<i>26.12%</i>	<i>10,352</i>	<i>11.42%</i>	<i>236</i>	<i>32.96%</i>	<i>7,171</i>	<i>7.91%</i>
Middle	453	63.27%	53,393	58.93%	161	22.49%	8,845	9.76%
Upper	76	10.61%	26,865	29.65%	280	39.11%	71,677	79.1%
Unknown	0	0.0%	0	0.0%	39	5.45%	2,917	3.22%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>716</b>	<b>100.0%</b>	<b>90,610</b>	<b>100.0%</b>	<b>716</b>	<b>100.0%</b>	<b>90,610</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	2	9.09%	12,481	21.18%	0	0.0%	0	0.0%
Moderate	3	13.64%	353	0.6%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>5</i>	<i>22.73%</i>	<i>12,834</i>	<i>21.78%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	15	68.18%	37,848	64.24%	0	0.0%	0	0.0%
Upper	2	9.09%	8,237	13.98%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	22	100.0%	58,919	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>58,919</b>	<b>100.0%</b>	<b>22</b>	<b>100.0%</b>	<b>58,919</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	40	0.44%	14,983	1.27%	682	7.43%	41,951	3.55%
Moderate	2,107	22.96%	197,625	16.74%	1,847	20.13%	157,839	13.37%
<i>Low/Moderate Total</i>	<i>2,147</i>	<i>23.4%</i>	<i>212,608</i>	<i>18.01%</i>	<i>2,529</i>	<i>27.56%</i>	<i>199,790</i>	<i>16.92%</i>
Middle	5,869	63.96%	776,317	65.75%	2,217	24.16%	240,320	20.35%
Upper	1,160	12.64%	191,765	16.24%	2,992	32.61%	510,327	43.22%
Unknown	0	0.0%	0	0.0%	1,438	15.67%	230,253	19.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>9,176</b>	<b>100.0%</b>	<b>1,180,690</b>	<b>100.0%</b>	<b>9,176</b>	<b>100.0%</b>	<b>1,180,690</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Ohio Central Non MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	85	1.45%	2,192	0.89%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1,309	22.31%	58,652	23.83%	16	5.23%	651	3.52%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	1,394	23.76%	60,844	24.72%	16	5.23%	651	3.52%	0	0.0%	0	0.0%
Middle	3,773	64.3%	165,086	67.06%	260	84.97%	16,327	88.25%	0	0.0%	0	0.0%
Upper	455	7.75%	16,629	6.76%	27	8.82%	1,507	8.15%	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	246	4.19%	3,607	1.47%	3	0.98%	15	0.08%	0	0.0%	0	0.0%
<b>Total</b>	<b>5,868</b>	<b>100%</b>	<b>246,166</b>	<b>100%</b>	<b>306</b>	<b>100%</b>	<b>18,500</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>				<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	2,569	43.78%	89,099	36.19%	185	60.46%	11,519	62.26%	0	0.0%	0	0.0%
	<b>By Loan Size</b>				<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	5,393	91.91%	86,746	35.24%	254	83.01%	6,311	34.11%	0	0.0%	0	0.0%
\$100,001 - \$250,000	253	4.31%	42,282	17.18%	34	11.11%	6,040	32.65%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	222	3.78%	117,138	47.58%	18	5.88%	6,149	33.24%	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%
<b>Total</b>	<b>5,868</b>	<b>100%</b>	<b>246,166</b>	<b>100%</b>	<b>306</b>	<b>100%</b>	<b>18,500</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Cincinnati OH-KY-IN MSA #17140**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Cincinnati MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	768	8.18%	69,644	3.97%
Moderate	678	7.22%	85,426	4.87%	1,880	20.02%	240,532	13.71%
<i>Low/Moderate Total</i>	<i>678</i>	<i>7.22%</i>	<i>85,426</i>	<i>4.87%</i>	<i>2,648</i>	<i>28.2%</i>	<i>310,176</i>	<i>17.68%</i>
Middle	4,624	49.24%	727,718	41.47%	1,917	20.41%	319,078	18.19%
Upper	4,089	43.54%	941,462	53.66%	3,348	35.65%	874,477	49.84%
Unknown	0	0.0%	0	0.0%	1,478	15.74%	250,875	14.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>9,391</b>	<b>100.0%</b>	<b>1,754,606</b>	<b>100.0%</b>	<b>9,391</b>	<b>100.0%</b>	<b>1,754,606</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	444	6.09%	40,074	3.21%
Moderate	498	6.84%	60,907	4.89%	991	13.6%	109,696	8.8%
<i>Low/Moderate Total</i>	<i>498</i>	<i>6.84%</i>	<i>60,907</i>	<i>4.89%</i>	<i>1,435</i>	<i>19.7%</i>	<i>149,770</i>	<i>12.01%</i>
Middle	3,429	47.06%	501,324	40.21%	1,403	19.26%	197,750	15.86%
Upper	3,359	46.1%	684,426	54.9%	2,918	40.05%	630,477	50.57%
Unknown	0	0.0%	0	0.0%	1,530	21.0%	268,660	21.55%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>7,286</b>	<b>100.0%</b>	<b>1,246,657</b>	<b>100.0%</b>	<b>7,286</b>	<b>100.0%</b>	<b>1,246,657</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	74	10.87%	2,738	4.75%
Moderate	58	8.52%	3,563	6.18%	119	17.47%	6,606	11.47%
<i>Low/Moderate Total</i>	<i>58</i>	<i>8.52%</i>	<i>3,563</i>	<i>6.18%</i>	<i>193</i>	<i>28.34%</i>	<i>9,344</i>	<i>16.22%</i>
Middle	357	52.42%	23,943	41.56%	163	23.94%	10,882	18.89%
Upper	266	39.06%	30,111	52.26%	296	43.47%	34,677	60.19%
Unknown	0	0.0%	0	0.0%	29	4.26%	2,714	4.71%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>681</b>	<b>100.0%</b>	<b>57,617</b>	<b>100.0%</b>	<b>681</b>	<b>100.0%</b>	<b>57,617</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	23.81%	22,318	41.77%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>5</i>	<i>23.81%</i>	<i>22,318</i>	<i>41.77%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	13	61.9%	26,064	48.78%	0	0.0%	0	0.0%
Upper	3	14.29%	5,048	9.45%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	21	100.0%	53,430	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>53,430</b>	<b>100.0%</b>	<b>21</b>	<b>100.0%</b>	<b>53,430</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	1,286	7.4%	112,456	3.61%
Moderate	1,239	7.13%	172,214	5.53%	2,990	17.2%	356,834	11.47%
<i>Low/Moderate Total</i>	<i>1,239</i>	<i>7.13%</i>	<i>172,214</i>	<i>5.53%</i>	<i>4,276</i>	<i>24.6%</i>	<i>469,290</i>	<i>15.08%</i>
Middle	8,423	48.47%	1,279,049	41.1%	3,483	20.04%	527,710	16.96%
Upper	7,717	44.4%	1,661,047	53.37%	6,562	37.76%	1,539,631	49.47%
Unknown	0	0.0%	0	0.0%	3,058	17.6%	575,679	18.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>17,379</b>	<b>100.0%</b>	<b>3,112,310</b>	<b>100.0%</b>	<b>17,379</b>	<b>100.0%</b>	<b>3,112,310</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Cincinnati MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	680	9.54%	39,747	13.06%	12	10.62%	276	6.66%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	680	9.54%	39,747	13.06%	12	10.62%	276	6.66%	0	0.0%	0	0.0%
Middle	3,262	45.76%	123,889	40.71%	79	69.91%	2,622	63.26%	0	0.0%	0	0.0%
Upper	3,119	43.75%	139,348	45.79%	22	19.47%	1,247	30.08%	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	68	0.95%	1,306	0.43%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>7,129</b>	<b>100%</b>	<b>304,290</b>	<b>100%</b>	<b>113</b>	<b>100%</b>	<b>4,145</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>				<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	3,676	51.56%	103,196	33.91%	57	50.44%	2,326	56.12%	0	0.0%	0	0.0%
	<b>By Loan Size</b>				<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	6,549	91.86%	94,708	31.12%	104	92.04%	2,070	49.94%	0	0.0%	0	0.0%
\$100,001 - \$250,000	278	3.9%	49,587	16.3%	7	6.19%	1,275	30.76%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	302	4.24%	159,995	52.58%	2	1.77%	800	19.3%	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%
<b>Total</b>	<b>7,129</b>	<b>100%</b>	<b>304,290</b>	<b>100%</b>	<b>113</b>	<b>100%</b>	<b>4,145</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Columbus OH MSA#18140**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial  
Columbus MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	42	0.6%	3,186	0.28%	697	9.88%	59,472	5.23%
Moderate	1,442	20.45%	158,632	13.94%	1,498	21.24%	186,354	16.38%
<i>Low/Moderate Total</i>	<i>1,484</i>	<i>21.04%</i>	<i>161,818</i>	<i>14.22%</i>	<i>2,195</i>	<i>31.12%</i>	<i>245,826</i>	<i>21.61%</i>
Middle	3,199	45.36%	514,422	45.21%	1,655	23.47%	266,062	23.39%
Upper	2,370	33.6%	461,499	40.56%	1,910	27.08%	428,799	37.69%
Unknown	0	0.0%	0	0.0%	1,293	18.33%	197,052	17.32%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>7,053</b>	<b>100.0%</b>	<b>1,137,739</b>	<b>100.0%</b>	<b>7,053</b>	<b>100.0%</b>	<b>1,137,739</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	17	0.36%	1,102	0.16%	408	8.58%	34,190	4.82%
Moderate	955	20.07%	105,630	14.88%	788	16.56%	83,115	11.71%
<i>Low/Moderate Total</i>	<i>972</i>	<i>20.43%</i>	<i>106,732</i>	<i>15.03%</i>	<i>1,196</i>	<i>25.14%</i>	<i>117,305</i>	<i>16.52%</i>
Middle	2,277	47.86%	343,110	48.33%	1,008	21.19%	134,027	18.88%
Upper	1,508	31.69%	260,009	36.62%	1,434	30.14%	274,089	38.61%
Unknown	1	0.02%	126	0.02%	1,120	23.54%	184,556	25.99%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>4,758</b>	<b>100.0%</b>	<b>709,977</b>	<b>100.0%</b>	<b>4,758</b>	<b>100.0%</b>	<b>709,977</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	2	0.25%	75	0.15%	108	13.71%	3,123	6.17%
Moderate	229	29.06%	11,592	22.9%	170	21.57%	8,908	17.6%
<i>Low/Moderate Total</i>	<i>231</i>	<i>29.31%</i>	<i>11,667</i>	<i>23.05%</i>	<i>278</i>	<i>35.28%</i>	<i>12,031</i>	<i>23.77%</i>
Middle	399	50.63%	28,625	56.55%	171	21.7%	9,828	19.41%
Upper	158	20.05%	10,330	20.41%	277	35.15%	25,458	50.29%
Unknown	0	0.0%	0	0.0%	62	7.87%	3,305	6.53%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>788</b>	<b>100.0%</b>	<b>50,622</b>	<b>100.0%</b>	<b>788</b>	<b>100.0%</b>	<b>50,622</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	23.53%	8,457	16.59%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>4</i>	<i>23.53%</i>	<i>8,457</i>	<i>16.59%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	11	64.71%	31,030	60.86%	0	0.0%	0	0.0%
Upper	2	11.76%	11,500	22.55%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	17	100.0%	50,987	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>17</b>	<b>100.0%</b>	<b>50,987</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>50,987</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	61	0.48%	4,363	0.22%	1,213	9.61%	96,785	4.97%
Moderate	2,630	20.85%	284,311	14.59%	2,456	19.47%	278,377	14.28%
<i>Low/Moderate Total</i>	<i>2,691</i>	<i>21.33%</i>	<i>288,674</i>	<i>14.81%</i>	<i>3,669</i>	<i>29.08%</i>	<i>375,162</i>	<i>19.25%</i>
Middle	5,886	46.66%	917,187	47.05%	2,834	22.46%	409,917	21.03%
Upper	4,038	32.01%	743,338	38.13%	3,621	28.7%	728,346	37.36%
Unknown	1	0.01%	126	0.01%	2,492	19.75%	435,900	22.36%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>12,616</b>	<b>100.0%</b>	<b>1,949,325</b>	<b>100.0%</b>	<b>12,616</b>	<b>100.0%</b>	<b>1,949,325</b>	<b>100.0%</b>

**Peer Group CRA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Columbus MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Tract Income				By Tract Income				By Tract Income			
Low	112	2.47%	10,076	4.97%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1,093	24.06%	45,137	22.28%	22	18.03%	2,027	21.5%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	1,205	26.53%	55,213	27.25%	22	18.03%	2,027	21.5%	0	0.0%	0	0.0%
Middle	2,035	44.8%	94,013	46.4%	79	64.75%	6,619	70.21%	0	0.0%	0	0.0%
Upper	1,204	26.51%	52,452	25.89%	21	17.21%	782	8.29%	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	98	2.16%	933	0.46%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>4,542</b>	<b>100%</b>	<b>202,611</b>	<b>100%</b>	<b>122</b>	<b>100%</b>	<b>9,428</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>				<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	2,175	47.89%	76,266	37.64%	52	42.62%	4,168	44.21%	0	0.0%	0	0.0%
	<b>By Loan Size</b>				<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	4,158	91.55%	71,187	35.13%	95	77.87%	2,493	26.44%	0	0.0%	0	0.0%
\$100,001 - \$250,000	202	4.45%	34,085	16.82%	16	13.11%	2,814	29.85%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	182	4.01%	97,339	48.04%	11	9.02%	4,121	43.71%	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%
<b>Total</b>	<b>4,542</b>	<b>100%</b>	<b>202,611</b>	<b>100%</b>	<b>122</b>	<b>100%</b>	<b>9,428</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Non-metropolitan Southeastern Ohio**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Ohio SE Non MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	89	9.72%	5,589	5.32%
Moderate	156	17.03%	14,686	13.97%	257	28.06%	23,517	22.37%
<i>Low/Moderate Total</i>	<i>156</i>	<i>17.03%</i>	<i>14,686</i>	<i>13.97%</i>	<i>346</i>	<i>37.77%</i>	<i>29,106</i>	<i>27.68%</i>
Middle	691	75.44%	77,749	73.95%	190	20.74%	22,030	20.95%
Upper	69	7.53%	12,701	12.08%	246	26.86%	39,697	37.66%
Unknown	0	0.0%	0	0.0%	134	14.63%	14,303	13.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>916</b>	<b>100.0%</b>	<b>105,136</b>	<b>100.0%</b>	<b>916</b>	<b>100.0%</b>	<b>105,136</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	55	8.02%	4,504	5.52%
Moderate	88	12.83%	7,745	9.5%	119	17.35%	10,451	12.81%
<i>Low/Moderate Total</i>	<i>88</i>	<i>12.83%</i>	<i>7,745</i>	<i>9.5%</i>	<i>174</i>	<i>25.36%</i>	<i>14,955</i>	<i>18.34%</i>
Middle	528	76.97%	61,008	74.8%	145	21.14%	16,034	19.66%
Upper	70	10.2%	12,810	15.71%	236	34.4%	33,819	41.46%
Unknown	0	0.0%	0	0.0%	131	19.1%	16,755	20.54%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>686</b>	<b>100.0%</b>	<b>81,563</b>	<b>100.0%</b>	<b>686</b>	<b>100.0%</b>	<b>81,563</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	7	9.33%	222	3.74%
Moderate	9	12.0%	499	8.4%	12	16.0%	687	11.57%
<i>Low/Moderate Total</i>	<i>9</i>	<i>12.0%</i>	<i>499</i>	<i>8.4%</i>	<i>19</i>	<i>25.33%</i>	<i>909</i>	<i>15.31%</i>
Middle	59	78.67%	4,948	83.33%	22	29.33%	1,496	25.19%
Upper	7	9.33%	491	8.27%	32	42.67%	3,293	55.46%
Unknown	0	0.0%	0	0.0%	2	2.67%	240	4.04%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>75</b>	<b>100.0%</b>	<b>5,938</b>	<b>100.0%</b>	<b>75</b>	<b>100.0%</b>	<b>5,938</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	733	34.36%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>50.0%</i>	<i>733</i>	<i>34.36%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	50.0%	1,400	65.64%	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%	2,133	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>2,133</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>2,133</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	151	8.99%	10,315	5.3%
Moderate	254	15.13%	23,663	12.15%	388	23.11%	34,655	17.79%
<i>Low/Moderate Total</i>	<i>254</i>	<i>15.13%</i>	<i>23,663</i>	<i>12.15%</i>	<i>539</i>	<i>32.1%</i>	<i>44,970</i>	<i>23.09%</i>
Middle	1,279	76.18%	145,105	74.5%	357	21.26%	39,560	20.31%
Upper	146	8.7%	26,002	13.35%	514	30.61%	76,809	39.44%
Unknown	0	0.0%	0	0.0%	269	16.02%	33,431	17.16%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>1,679</b>	<b>100.0%</b>	<b>194,770</b>	<b>100.0%</b>	<b>1,679</b>	<b>100.0%</b>	<b>194,770</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Ohio SE Non MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	130	17.29%	2,285	11.08%	6	5.36%	56	1.14%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	130	17.29%	2,285	11.08%	6	5.36%	56	1.14%	0	0.0%	0	0.0%
Middle	518	68.88%	15,033	72.87%	82	73.21%	3,506	71.33%	0	0.0%	0	0.0%
Upper	85	11.3%	2,961	14.35%	24	21.43%	1,353	27.53%	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	19	2.53%	351	1.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>752</b>	<b>100%</b>	<b>20,630</b>	<b>100%</b>	<b>112</b>	<b>100%</b>	<b>4,915</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>				<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	328	43.62%	7,685	37.25%	58	51.79%	3,205	65.21%	0	0.0%	0	0.0%
	<b>By Loan Size</b>				<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	718	95.48%	9,529	46.19%	101	90.18%	2,630	53.51%	0	0.0%	0	0.0%
\$100,001 - \$250,000	17	2.26%	2,899	14.05%	9	8.04%	1,485	30.21%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	17	2.26%	8,202	39.76%	2	1.79%	800	16.28%	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%
<b>Total</b>	<b>752</b>	<b>100%</b>	<b>20,630</b>	<b>100%</b>	<b>112</b>	<b>100%</b>	<b>4,915</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Akron OH MSA #10420**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Akron MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	200	2.45%	11,783	0.96%	875	10.71%	62,661	5.09%
Moderate	1,218	14.9%	98,208	7.98%	1,736	21.24%	179,792	14.61%
<i>Low/Moderate Total</i>	<i>1,418</i>	<i>17.35%</i>	<i>109,991</i>	<i>8.94%</i>	<i>2,611</i>	<i>31.95%</i>	<i>242,453</i>	<i>19.7%</i>
Middle	3,016	36.9%	358,910	29.16%	1,654	20.24%	228,567	18.57%
Upper	3,739	45.75%	761,757	61.9%	2,524	30.88%	573,717	46.62%
Unknown	0	0.0%	0	0.0%	1,384	16.93%	185,921	15.11%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>8,173</b>	<b>100.0%</b>	<b>1,230,658</b>	<b>100.0%</b>	<b>8,173</b>	<b>100.0%</b>	<b>1,230,658</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	139	2.65%	10,298	1.4%	393	7.49%	28,550	3.89%
Moderate	681	12.98%	54,988	7.48%	777	14.81%	70,975	9.66%
<i>Low/Moderate Total</i>	<i>820</i>	<i>15.63%</i>	<i>65,286</i>	<i>8.88%</i>	<i>1,170</i>	<i>22.31%</i>	<i>99,525</i>	<i>13.54%</i>
Middle	1,912	36.45%	212,505	28.92%	996	18.99%	116,859	15.9%
Upper	2,513	47.91%	457,064	62.2%	2,000	38.13%	368,208	50.11%
Unknown	0	0.0%	0	0.0%	1,079	20.57%	150,263	20.45%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>5,245</b>	<b>100.0%</b>	<b>734,855</b>	<b>100.0%</b>	<b>5,245</b>	<b>100.0%</b>	<b>734,855</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	33	5.61%	1,874	4.32%	71	12.07%	2,027	4.68%
Moderate	105	17.86%	2,949	6.8%	109	18.54%	3,340	7.7%
<i>Low/Moderate Total</i>	<i>138</i>	<i>23.47%</i>	<i>4,823</i>	<i>11.12%</i>	<i>180</i>	<i>30.61%</i>	<i>5,367</i>	<i>12.38%</i>
Middle	196	33.33%	9,873	22.77%	126	21.43%	6,745	15.56%
Upper	254	43.2%	28,659	66.1%	256	43.54%	27,290	62.95%
Unknown	0	0.0%	0	0.0%	26	4.42%	3,953	9.12%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>588</b>	<b>100.0%</b>	<b>43,355</b>	<b>100.0%</b>	<b>588</b>	<b>100.0%</b>	<b>43,355</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	10	17.24%	10,001	6.31%	0	0.0%	0	0.0%
Moderate	12	20.69%	5,077	3.2%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>22</i>	<i>37.93%</i>	<i>15,078</i>	<i>9.51%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	17	29.31%	61,380	38.71%	0	0.0%	0	0.0%
Upper	19	32.76%	82,086	51.77%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	58	100.0%	158,544	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>58</b>	<b>100.0%</b>	<b>158,544</b>	<b>100.0%</b>	<b>58</b>	<b>100.0%</b>	<b>158,544</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	382	2.72%	33,956	1.57%	1,339	9.52%	93,238	4.3%
Moderate	2,016	14.33%	161,222	7.44%	2,622	18.64%	254,107	11.72%
<i>Low/Moderate Total</i>	<i>2,398</i>	<i>17.05%</i>	<i>195,178</i>	<i>9.01%</i>	<i>3,961</i>	<i>28.16%</i>	<i>347,345</i>	<i>16.03%</i>
Middle	5,141	36.55%	642,668	29.65%	2,776	19.74%	352,171	16.25%
Upper	6,525	46.4%	1,329,566	61.34%	4,780	33.99%	969,215	44.72%
Unknown	0	0.0%	0	0.0%	2,547	18.11%	498,681	23.01%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>14,064</b>	<b>100.0%</b>	<b>2,167,412</b>	<b>100.0%</b>	<b>14,064</b>	<b>100.0%</b>	<b>2,167,412</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Akron MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Tract Income				By Tract Income				By Tract Income			
Low	535	6.63%	33,834	8.25%	2	16.67%	14	3.33%	0	0.0%	0	0.0%
Moderate	1,274	15.78%	80,064	19.53%	1	8.33%	5	1.19%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	1,809	22.41%	113,898	27.79%	3	25.0%	19	4.51%	0	0.0%	0	0.0%
Middle	2,434	30.16%	108,962	26.58%	2	16.67%	10	2.38%	0	0.0%	0	0.0%
Upper	3,748	46.44%	184,826	45.09%	7	58.33%	392	93.11%	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	80	0.99%	2,218	0.54%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>8,071</b>	<b>100%</b>	<b>409,904</b>	<b>100%</b>	<b>12</b>	<b>100%</b>	<b>421</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	By Revenue				By Revenue				By Revenue			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Loan Size				By Loan Size				By Loan Size			
Total \$1 Million or Less	3,450	42.75%	109,252	26.65%	8	66.67%	394	93.59%	0	0.0%	0	0.0%
\$100,000 or Less	7,284	90.25%	122,850	29.97%	11	91.67%	271	64.37%	0	0.0%	0	0.0%
\$100,001 - \$250,000	397	4.92%	70,246	17.14%	1	8.33%	150	35.63%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	390	4.83%	216,808	52.89%	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%
<b>Total</b>	<b>8,071</b>	<b>100%</b>	<b>409,904</b>	<b>100%</b>	<b>12</b>	<b>100%</b>	<b>421</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Cleveland-Elyria OH MSA #17460**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Cleveland MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	531	2.93%	55,940	2.05%	1,728	9.52%	125,621	4.59%
Moderate	1,890	10.42%	175,765	6.43%	3,947	21.75%	396,409	14.49%
<i>Low/Moderate Total</i>	<i>2,421</i>	<i>13.34%</i>	<i>231,705</i>	<i>8.47%</i>	<i>5,675</i>	<i>31.28%</i>	<i>522,030</i>	<i>19.09%</i>
Middle	7,850	43.27%	876,611	32.05%	3,804	20.97%	504,640	18.45%
Upper	7,871	43.38%	1,626,815	59.48%	5,833	32.15%	1,330,358	48.64%
Unknown	1	0.01%	119	0.0%	2,831	15.6%	378,222	13.83%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>18,143</b>	<b>100.0%</b>	<b>2,735,250</b>	<b>100.0%</b>	<b>18,143</b>	<b>100.0%</b>	<b>2,735,250</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	296	2.48%	25,357	1.45%	755	6.31%	55,890	3.2%
Moderate	1,113	9.31%	97,604	5.58%	1,590	13.3%	144,871	8.29%
<i>Low/Moderate Total</i>	<i>1,409</i>	<i>11.78%</i>	<i>122,961</i>	<i>7.03%</i>	<i>2,345</i>	<i>19.61%</i>	<i>200,761</i>	<i>11.48%</i>
Middle	4,681	39.15%	509,228	29.13%	2,405	20.12%	277,420	15.87%
Upper	5,866	49.06%	1,116,209	63.84%	4,783	40.01%	915,161	52.34%
Unknown	0	0.0%	0	0.0%	2,423	20.27%	355,056	20.31%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>11,956</b>	<b>100.0%</b>	<b>1,748,398</b>	<b>100.0%</b>	<b>11,956</b>	<b>100.0%</b>	<b>1,748,398</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	115	5.76%	2,812	2.89%	180	9.02%	3,064	3.14%
Moderate	329	16.49%	8,350	8.57%	378	18.95%	8,933	9.17%
<i>Low/Moderate Total</i>	<i>444</i>	<i>22.26%</i>	<i>11,162</i>	<i>11.45%</i>	<i>558</i>	<i>27.97%</i>	<i>11,997</i>	<i>12.31%</i>
Middle	728	36.49%	25,947	26.62%	466	23.36%	17,679	18.14%
Upper	823	41.25%	60,354	61.93%	889	44.56%	61,399	63.0%
Unknown	0	0.0%	0	0.0%	82	4.11%	6,388	6.55%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>1,995</b>	<b>100.0%</b>	<b>97,463</b>	<b>100.0%</b>	<b>1,995</b>	<b>100.0%</b>	<b>97,463</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	24	16.78%	48,379	10.25%	0	0.0%	0	0.0%
Moderate	33	23.08%	80,876	17.14%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>57</i>	<i>39.86%</i>	<i>129,255</i>	<i>27.39%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	64	44.76%	227,723	48.26%	0	0.0%	0	0.0%
Upper	22	15.38%	114,872	24.35%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	143	100.0%	471,850	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>143</b>	<b>100.0%</b>	<b>471,850</b>	<b>100.0%</b>	<b>143</b>	<b>100.0%</b>	<b>471,850</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	966	3.0%	132,488	2.62%	2,663	8.26%	184,575	3.65%
Moderate	3,365	10.44%	362,595	7.18%	5,915	18.35%	550,213	10.89%
<i>Low/Moderate Total</i>	<i>4,331</i>	<i>13.43%</i>	<i>495,083</i>	<i>9.8%</i>	<i>8,578</i>	<i>26.61%</i>	<i>734,788</i>	<i>14.54%</i>
Middle	13,323	41.33%	1,639,509	32.45%	6,675	20.71%	799,739	15.83%
Upper	14,582	45.23%	2,918,250	57.75%	11,505	35.69%	2,306,918	45.65%
Unknown	1	0.0%	119	0.0%	5,479	17.0%	1,211,516	23.98%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>32,237</b>	<b>100.0%</b>	<b>5,052,961</b>	<b>100.0%</b>	<b>32,237</b>	<b>100.0%</b>	<b>5,052,961</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Cleveland MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	2,007	8.24%	99,848	8.77%	2	7.41%	20	1.92%	0	0.0%	0	0.0%
Moderate	3,124	12.83%	158,087	13.88%	6	22.22%	183	17.61%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	5,131	21.07%	257,935	22.65%	8	29.63%	203	19.54%	0	0.0%	0	0.0%
Middle	8,746	35.92%	422,347	37.08%	7	25.93%	95	9.14%	0	0.0%	0	0.0%
Upper	10,281	42.22%	452,338	39.72%	12	44.44%	741	71.32%	0	0.0%	0	0.0%
Unknown	49	0.2%	4,222	0.37%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	143	0.59%	2,039	0.18%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>24,350</b>	<b>100%</b>	<b>1,138,881</b>	<b>100%</b>	<b>27</b>	<b>100%</b>	<b>1,039</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>				<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	11,384	46.75%	299,444	26.29%	13	48.15%	304	29.26%	0	0.0%	0	0.0%
	<b>By Loan Size</b>				<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	22,277	91.49%	359,128	31.53%	24	88.89%	312	30.03%	0	0.0%	0	0.0%
\$100,001 - \$250,000	954	3.92%	170,882	15.0%	2	7.41%	277	26.66%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1,119	4.6%	608,871	53.46%	1	3.7%	450	43.31%	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%
<b>Total</b>	<b>24,350</b>	<b>100%</b>	<b>1,138,881</b>	<b>100%</b>	<b>27</b>	<b>100%</b>	<b>1,039</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Dayton OH MSA #19380**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Dayton MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	183	2.48%	17,525	1.85%	673	9.1%	44,168	4.67%
Moderate	1,000	13.53%	79,851	8.44%	1,499	20.28%	137,107	14.48%
<i>Low/Moderate Total</i>	<i>1,183</i>	<i>16.0%</i>	<i>97,376</i>	<i>10.29%</i>	<i>2,172</i>	<i>29.38%</i>	<i>181,275</i>	<i>19.15%</i>
Middle	3,629	49.09%	397,592	42.0%	1,612	21.8%	193,307	20.42%
Upper	2,581	34.91%	451,672	47.71%	2,203	29.8%	407,357	43.03%
Unknown	0	0.0%	0	0.0%	1,406	19.02%	164,701	17.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>7,393</b>	<b>100.0%</b>	<b>946,640</b>	<b>100.0%</b>	<b>7,393</b>	<b>100.0%</b>	<b>946,640</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	136	2.71%	10,150	1.67%	373	7.42%	23,934	3.94%
Moderate	682	13.57%	52,446	8.64%	647	12.87%	52,557	8.65%
<i>Low/Moderate Total</i>	<i>818</i>	<i>16.28%</i>	<i>62,596</i>	<i>10.31%</i>	<i>1,020</i>	<i>20.29%</i>	<i>76,491</i>	<i>12.6%</i>
Middle	2,447	48.69%	259,099	42.67%	926	18.42%	92,816	15.28%
Upper	1,761	35.04%	285,592	47.03%	1,677	33.37%	252,645	41.6%
Unknown	0	0.0%	0	0.0%	1,403	27.91%	185,335	30.52%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>5,026</b>	<b>100.0%</b>	<b>607,287</b>	<b>100.0%</b>	<b>5,026</b>	<b>100.0%</b>	<b>607,287</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	24	4.89%	595	2.23%	53	10.79%	949	3.56%
Moderate	81	16.5%	2,370	8.89%	83	16.9%	2,355	8.84%
<i>Low/Moderate Total</i>	<i>105</i>	<i>21.38%</i>	<i>2,965</i>	<i>11.12%</i>	<i>136</i>	<i>27.7%</i>	<i>3,304</i>	<i>12.4%</i>
Middle	235	47.86%	11,523	43.23%	120	24.44%	6,382	23.94%
Upper	151	30.75%	12,166	45.64%	218	44.4%	15,583	58.46%
Unknown	0	0.0%	0	0.0%	17	3.46%	1,385	5.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>491</b>	<b>100.0%</b>	<b>26,654</b>	<b>100.0%</b>	<b>491</b>	<b>100.0%</b>	<b>26,654</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	5	8.33%	4,783	2.07%	0	0.0%	0	0.0%
Moderate	15	25.0%	62,086	26.93%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>20</i>	<i>33.33%</i>	<i>66,869</i>	<i>29.01%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	26	43.33%	97,211	42.17%	0	0.0%	0	0.0%
Upper	14	23.33%	66,433	28.82%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	60	100.0%	230,513	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>60</b>	<b>100.0%</b>	<b>230,513</b>	<b>100.0%</b>	<b>60</b>	<b>100.0%</b>	<b>230,513</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	348	2.68%	33,053	1.83%	1,099	8.47%	69,051	3.81%
Moderate	1,778	13.71%	196,753	10.86%	2,229	17.19%	192,019	10.6%
<i>Low/Moderate Total</i>	<i>2,126</i>	<i>16.39%</i>	<i>229,806</i>	<i>12.69%</i>	<i>3,328</i>	<i>25.66%</i>	<i>261,070</i>	<i>14.42%</i>
Middle	6,337	48.86%	765,425	42.26%	2,658	20.49%	292,505	16.15%
Upper	4,507	34.75%	815,863	45.05%	4,098	31.6%	675,585	37.3%
Unknown	0	0.0%	0	0.0%	2,886	22.25%	581,934	32.13%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>12,970</b>	<b>100.0%</b>	<b>1,811,094</b>	<b>100.0%</b>	<b>12,970</b>	<b>100.0%</b>	<b>1,811,094</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Dayton MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Tract Income				By Tract Income				By Tract Income			
Low	668	9.52%	55,436	13.28%	1	2.13%	5	0.22%	0	0.0%	0	0.0%
Moderate	1,330	18.95%	110,357	26.43%	2	4.26%	92	3.99%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	1,998	28.47%	165,793	39.7%	3	6.38%	97	4.2%	0	0.0%	0	0.0%
Middle	2,974	42.37%	152,086	36.42%	30	63.83%	1,837	79.63%	0	0.0%	0	0.0%
Upper	1,984	28.27%	98,630	23.62%	13	27.66%	368	15.95%	0	0.0%	0	0.0%
Unknown	1	0.01%	30	0.01%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	62	0.88%	1,054	0.25%	1	2.13%	5	0.22%	0	0.0%	0	0.0%
<b>Total</b>	<b>7,019</b>	<b>100%</b>	<b>417,593</b>	<b>100%</b>	<b>47</b>	<b>100%</b>	<b>2,307</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	By Revenue				By Revenue				By Revenue			
Total \$1 Million or Less	3,016	42.97%	114,091	27.32%	23	48.94%	1,084	46.99%	0	0.0%	0	0.0%
	By Loan Size				By Loan Size				By Loan Size			
\$100,000 or Less	6,173	87.95%	105,481	25.26%	41	87.23%	785	34.03%	0	0.0%	0	0.0%
\$100,001 - \$250,000	415	5.91%	74,469	17.83%	3	6.38%	477	20.68%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	431	6.14%	237,643	56.91%	3	6.38%	1,045	45.3%	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%
<b>Total</b>	<b>7,019</b>	<b>100%</b>	<b>417,593</b>	<b>100%</b>	<b>47</b>	<b>100%</b>	<b>2,307</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Parkersburg-Vienna WV MSA #37620**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Parkersburg/Vienna MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	67	7.59%	4,176	3.65%
Moderate	91	10.31%	7,035	6.15%	177	20.05%	16,103	14.08%
<i>Low/Moderate Total</i>	<i>91</i>	<i>10.31%</i>	<i>7,035</i>	<i>6.15%</i>	<i>244</i>	<i>27.63%</i>	<i>20,279</i>	<i>17.73%</i>
Middle	616	69.76%	81,138	70.95%	205	23.22%	23,621	20.66%
Upper	176	19.93%	26,182	22.9%	330	37.37%	56,308	49.24%
Unknown	0	0.0%	0	0.0%	104	11.78%	14,147	12.37%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>883</b>	<b>100.0%</b>	<b>114,355</b>	<b>100.0%</b>	<b>883</b>	<b>100.0%</b>	<b>114,355</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	38	7.01%	2,552	3.62%
Moderate	53	9.78%	5,160	7.32%	71	13.1%	6,030	8.56%
<i>Low/Moderate Total</i>	<i>53</i>	<i>9.78%</i>	<i>5,160</i>	<i>7.32%</i>	<i>109</i>	<i>20.11%</i>	<i>8,582</i>	<i>12.18%</i>
Middle	391	72.14%	51,033	72.41%	126	23.25%	12,998	18.44%
Upper	98	18.08%	14,281	20.26%	216	39.85%	34,697	49.23%
Unknown	0	0.0%	0	0.0%	91	16.79%	14,197	20.15%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>542</b>	<b>100.0%</b>	<b>70,474</b>	<b>100.0%</b>	<b>542</b>	<b>100.0%</b>	<b>70,474</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	19	10.86%	245	2.22%
Moderate	30	17.14%	1,475	13.35%	37	21.14%	1,121	10.14%
<i>Low/Moderate Total</i>	<i>30</i>	<i>17.14%</i>	<i>1,475</i>	<i>13.35%</i>	<i>56</i>	<i>32.0%</i>	<i>1,366</i>	<i>12.36%</i>
Middle	109	62.29%	7,545	68.27%	36	20.57%	1,615	14.61%
Upper	36	20.57%	2,032	18.39%	73	41.71%	6,365	57.59%
Unknown	0	0.0%	0	0.0%	10	5.71%	1,706	15.44%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>175</b>	<b>100.0%</b>	<b>11,052</b>	<b>100.0%</b>	<b>175</b>	<b>100.0%</b>	<b>11,052</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	14.29%	122	4.66%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>14.29%</i>	<i>122</i>	<i>4.66%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	5	71.43%	1,972	75.3%	0	0.0%	0	0.0%
Upper	1	14.29%	525	20.05%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	7	100.0%	2,619	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>2,619</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>2,619</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	124	7.72%	6,973	3.51%
Moderate	175	10.89%	13,792	6.95%	285	17.73%	23,254	11.71%
<i>Low/Moderate Total</i>	<i>175</i>	<i>10.89%</i>	<i>13,792</i>	<i>6.95%</i>	<i>409</i>	<i>25.45%</i>	<i>30,227</i>	<i>15.23%</i>
Middle	1,121	69.76%	141,688	71.38%	367	22.84%	38,234	19.26%
Upper	311	19.35%	43,020	21.67%	619	38.52%	97,370	49.05%
Unknown	0	0.0%	0	0.0%	212	13.19%	32,669	16.46%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>1,607</b>	<b>100.0%</b>	<b>198,500</b>	<b>100.0%</b>	<b>1,607</b>	<b>100.0%</b>	<b>198,500</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

Parkersburg/Vienna MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	281	29.61%	22,631	43.92%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	281	29.61%	22,631	43.92%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	552	58.17%	25,495	49.48%	1	100.0%	500	100.0%	0	0.0%	0	0.0%
Upper	99	10.43%	3,180	6.17%	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	17	1.79%	217	0.42%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>949</b>	<b>100%</b>	<b>51,523</b>	<b>100%</b>	<b>1</b>	<b>100%</b>	<b>500</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>				<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	472	49.74%	22,474	43.62%	1	100.0%	500	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>				<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	837	88.2%	13,812	26.81%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	62	6.53%	11,033	21.41%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	50	5.27%	26,678	51.78%	1	100.0%	500	100.0%	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%
<b>Total</b>	<b>949</b>	<b>100%</b>	<b>51,523</b>	<b>100%</b>	<b>1</b>	<b>100%</b>	<b>500</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Non-metropolitan North WV**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

West Virginia North Non MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	5	5.56%	369	2.76%
Moderate	0	0.0%	0	0.0%	18	20.0%	1,396	10.45%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>23</i>	<i>25.56%</i>	<i>1,765</i>	<i>13.21%</i>
Middle	82	91.11%	12,076	90.38%	20	22.22%	2,132	15.96%
Upper	7	7.78%	1,148	8.59%	28	31.11%	4,210	31.51%
Unknown	1	1.11%	138	1.03%	19	21.11%	5,255	39.33%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>90</b>	<b>100.0%</b>	<b>13,362</b>	<b>100.0%</b>	<b>90</b>	<b>100.0%</b>	<b>13,362</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	4	10.0%	263	6.69%
Moderate	0	0.0%	0	0.0%	1	2.5%	35	0.89%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>5</i>	<i>12.5%</i>	<i>298</i>	<i>7.57%</i>
Middle	37	92.5%	3,483	88.54%	5	12.5%	367	9.33%
Upper	3	7.5%	451	11.46%	23	57.5%	2,355	59.86%
Unknown	0	0.0%	0	0.0%	7	17.5%	914	23.23%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>40</b>	<b>100.0%</b>	<b>3,934</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>3,934</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	4	20.0%	12	1.33%
Moderate	0	0.0%	0	0.0%	4	20.0%	50	5.56%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>8</i>	<i>40.0%</i>	<i>62</i>	<i>6.9%</i>
Middle	19	95.0%	818	90.99%	4	20.0%	241	26.81%
Upper	1	5.0%	81	9.01%	7	35.0%	590	65.63%
Unknown	0	0.0%	0	0.0%	1	5.0%	6	0.67%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>899</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>899</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	100.0%	110	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%	1	100.0%	110	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>110</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>110</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	13	8.61%	644	3.52%
Moderate	0	0.0%	0	0.0%	23	15.23%	1,481	8.09%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>36</i>	<i>23.84%</i>	<i>2,125</i>	<i>11.61%</i>
Middle	139	92.05%	16,487	90.07%	29	19.21%	2,740	14.97%
Upper	11	7.28%	1,680	9.18%	58	38.41%	7,155	39.09%
Unknown	1	0.66%	138	0.75%	28	18.54%	6,285	34.33%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>151</b>	<b>100.0%</b>	<b>18,305</b>	<b>100.0%</b>	<b>151</b>	<b>100.0%</b>	<b>18,305</b>	<b>100.0%</b>

**Peer Group CRA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

West Virginia North Non MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>				<b>By Tract Income</b>			
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%
<i>Low/Moderate Income</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	90	78.95%	3,050	73.21%	2	100.0%	25	100.0%	0	0.0%	0	0.0%
Upper	11	9.65%	248	5.95%	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	13	11.4%	868	20.84%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>114</b>	<b>100%</b>	<b>4,166</b>	<b>100%</b>	<b>2</b>	<b>100%</b>	<b>25</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>				<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	33	28.95%	744	17.86%	2	100.0%	25	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>				<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	107	93.86%	1,546	37.11%	2	100.0%	25	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	3.51%	670	16.08%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	2.63%	1,950	46.81%	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%
<b>Total</b>	<b>114</b>	<b>100%</b>	<b>4,166</b>	<b>100%</b>	<b>2</b>	<b>100%</b>	<b>25</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**Non-metropolitan West WV**

**Peer Group HMDA Loan Distribution Table**

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

West Virginia West Non MSA 2015

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	8	3.59%	540	2.14%
Moderate	18	8.07%	2,128	8.42%	42	18.83%	3,396	13.44%
<i>Low/Moderate Total</i>	<i>18</i>	<i>8.07%</i>	<i>2,128</i>	<i>8.42%</i>	<i>50</i>	<i>22.42%</i>	<i>3,936</i>	<i>15.57%</i>
Middle	149	66.82%	17,576	69.53%	42	18.83%	4,311	17.06%
Upper	55	24.66%	5,405	21.38%	95	42.6%	13,198	52.21%
Unknown	1	0.45%	168	0.66%	36	16.14%	3,832	15.16%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>223</b>	<b>100.0%</b>	<b>25,277</b>	<b>100.0%</b>	<b>223</b>	<b>100.0%</b>	<b>25,277</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	3	3.13%	173	1.44%
Moderate	10	10.42%	960	7.99%	12	12.5%	648	5.4%
<i>Low/Moderate Total</i>	<i>10</i>	<i>10.42%</i>	<i>960</i>	<i>7.99%</i>	<i>15</i>	<i>15.63%</i>	<i>821</i>	<i>6.84%</i>
Middle	66	68.75%	9,208	76.66%	17	17.71%	1,276	10.62%
Upper	20	20.83%	1,843	15.34%	50	52.08%	7,895	65.73%
Unknown	0	0.0%	0	0.0%	14	14.58%	2,019	16.81%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>96</b>	<b>100.0%</b>	<b>12,011</b>	<b>100.0%</b>	<b>96</b>	<b>100.0%</b>	<b>12,011</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	3	6.38%	25	1.44%
Moderate	8	17.02%	222	12.77%	7	14.89%	210	12.08%
<i>Low/Moderate Total</i>	<i>8</i>	<i>17.02%</i>	<i>222</i>	<i>12.77%</i>	<i>10</i>	<i>21.28%</i>	<i>235</i>	<i>13.51%</i>
Middle	35	74.47%	1,447	83.21%	12	25.53%	411	23.63%
Upper	4	8.51%	70	4.03%	24	51.06%	1,083	62.28%
Unknown	0	0.0%	0	0.0%	1	2.13%	10	0.58%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>1,739</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>1,739</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
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%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	14	3.83%	738	1.89%
Moderate	36	9.84%	3,310	8.48%	61	16.67%	4,254	10.9%
<i>Low/Moderate Total</i>	<i>36</i>	<i>9.84%</i>	<i>3,310</i>	<i>8.48%</i>	<i>75</i>	<i>20.49%</i>	<i>4,992</i>	<i>12.79%</i>
Middle	250	68.31%	28,231	72.34%	71	19.4%	5,998	15.37%
Upper	79	21.58%	7,318	18.75%	169	46.17%	22,176	56.82%
Unknown	1	0.27%	168	0.43%	51	13.93%	5,861	15.02%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>366</b>	<b>100.0%</b>	<b>39,027</b>	<b>100.0%</b>	<b>366</b>	<b>100.0%</b>	<b>39,027</b>	<b>100.0%</b>

Peer Group CRA Loan Distribution Table

Exam ID: Peoples Bank Marietta, Initial

Selected Year: 2015

West Virginia West Non MSA 2015

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	<b>By Tract Income</b>				<b>By Tract Income</b>				<b>By Tract Income</b>			
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	7	6.25%	94	2.2%	2	16.67%	28	28.87%	0	0.0%	0	0.0%
<i>Low/Moderate Income</i>	7	6.25%	94	2.2%	2	16.67%	28	28.87%	0	0.0%	0	0.0%
Middle	68	60.71%	3,035	71.11%	10	83.33%	69	71.13%	0	0.0%	0	0.0%
Upper	33	29.46%	1,128	26.43%	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	4	3.57%	11	0.26%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>112</b>	<b>100%</b>	<b>4,268</b>	<b>100%</b>	<b>12</b>	<b>100%</b>	<b>97</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>				<b>By Revenue</b>				<b>By Revenue</b>			
Total \$1 Million or Less	52	46.43%	1,939	45.43%	1	8.33%	30	30.93%	0	0.0%	0	0.0%
	<b>By Loan Size</b>				<b>By Loan Size</b>				<b>By Loan Size</b>			
\$100,000 or Less	103	91.96%	1,507	35.31%	12	100.0%	97	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	7	6.25%	1,294	30.32%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	1.79%	1,467	34.37%	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%
<b>Total</b>	<b>112</b>	<b>100%</b>	<b>4,268</b>	<b>100%</b>	<b>12</b>	<b>100%</b>	<b>97</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

APPENDIX E

BRANCH DISTRIBUTION

Geographic Distribution of Branches

Analysis Year: 2016

Exam: Peoples Bank Marietta, Initial

Assessment Area(s): Akron MSA 2016, Cincinnati MSA 2016, Cleveland MSA 2016, Columbus MSA 2016,

Tract Income Levels	BRANCHES							DEMOGRAPHICS				
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	#	%	%	%	
Low	<b>Total</b>	<b>2</b>	<b>2.7%</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	207	14.2%	9.3%	7.5%
	DTO	0		0	0	0	0	0				
	LS	0		0	0	0	0	0				
Moderate	<b>Total</b>	<b>24</b>	<b>32.4%</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	359	24.6%	22.3%	18.5%
	DTO	0		0	0	0	0	0				
	LS	0		0	0	0	0	0				
Middle	<b>Total</b>	<b>40</b>	<b>54.1%</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	562	38.6%	43.1%	39.9%
	DTO	0		0	0	0	0	0				
	LS	0		0	0	0	0	0				
Upper	<b>Total</b>	<b>8</b>	<b>10.8%</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	320	22.0%	25.3%	33.9%
	DTO	0		0	0	0	0	0				
	LS	0		0	0	0	0	0				
Unknown	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	9	0.6%	0.0%	0.2%
	DTO	0		0	0	0	0	0				
	LS	0		0	0	0	0	0				
<i>Totals</i>	<b>Total</b>	<b>74**</b>	<b>100.0%</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	1457	100.0%	100.0%	100.0%
	DTO	0		0	0	0	0	0				
	LS	0		0	0	0	0	0				

DTO - Drive Thru Only

LS - Limited Service

Shaded rows indicate totals; unshaded rows are a subset of shaded rows

\*Closed branches are only included in the "Closed" columns and are not included in any other totals

LPOs not included in totals.

\*\*The total number of branches in this table does not reflect two branches that closed in moderate-income tracts 12/30/17. Taking these into account, the total of branches is 72.

**Geographic Distribution of ATMs**

Exam: Peoples Bank Marietta, Initial

Analysis Year: 2016

Assessment Area(s): Akron MSA 2016, Cincinnati MSA 2016, Cleveland MSA 2016, Columbus MSA 2016, Dayton MSA 2016, Huntington A .... (more)

Tract Income Levels	ATMS										DEMOGRAPHICS				
	Total ATMS		Full Service				Cash Only				Census Tracts		Households	Total Businesses	
	Total	%	Total	%	Opened	Closed	Total	%	Opened	Closed	#	%	%	%	
Low	<b>Total</b>	2	2.6%	2	3.4%	0	1	0	0.0%	0	0	207	14.2%	9.3%	7.5%
	Stand Alone	0		0		0	0	0		0	0				
Moderate	<b>Total</b>	23	29.9%	19	32.2%	7	1	4	22.2%	1	1	359	24.6%	22.3%	18.5%
	Stand Alone	3		0		0	0	3		0	1				
Middle	<b>Total</b>	44	57.1%	31	52.5%	20	2	13	72.2%	3	0	562	38.6%	43.1%	39.9%
	Stand Alone	9		0		0	0	9		2	0				
Upper	<b>Total</b>	8	10.4%	7	11.9%	4	0	1	5.6%	0	0	320	22.0%	25.3%	33.9%
	Stand Alone	1		0		0	0	1		0	0				
Unknown	<b>Total</b>	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	9	0.6%	0.0%	0.2%
	Stand Alone	0		0		0	0	0		0	0				
<i>Totals</i>	<b>Total</b>	77	100.0%	59	100.0%	31	4	18	100.0%	4	1	1457	100.0%	100.0%	100.0%
	Stand Alone	13		0		0	0	13		2	1				

Shaded rows indicate totals; unshaded rows are a subset of shaded rows  
 \*The total number of ATMs does not reflect one ATM that opened October 2016 in a middle-income tract and two ATM's in moderate-income tracts that closed December 30, 2016. Total ATMs should be 76.

## APPENDIX F

### 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 Non-metropolitan 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 refinancing 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 geography.

**Market share:** The number of loans originated and purchased by CTBI 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 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 CTBI 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, CTBI's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, CTBI 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, CTBI 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.