



Comptroller of the Currency
Administrator of National Banks

PUBLIC DISCLOSURE

September 3, 1997

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Wheeling National Bank
Charter Number #16696**

**135 West Main Street
St. Clairsville, OH 43950**

**Office of the Comptroller of the Currency
Administrator of National Banks
Pittsburgh Field Office
4075 Monroeville Boulevard, Suite 300
Monroeville, PA 15146**

NOTE: 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.

GENERAL INFORMATION

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

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Wheeling National Bank** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of June 30, 1997. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

INSTITUTION'S CRA RATINGS:

Overall Rating for Institution:	Satisfactory
Rating for State of West Virginia:	Satisfactory
Rating for State of Ohio:	Satisfactory
Rating for Multi-state MSA 9000 Wheeling-Bridgeport:	Satisfactory
Rating for Multi-state MSA 8080 Weirton-Steubenville:	Satisfactory

Wheeling National Bank (WNB) has met or exceeded the standards for satisfactory performance for each of the following assessment criteria: loan to deposit ratio, lending within the assessment area, lending to borrowers of different incomes and to businesses of different sizes, and geographic distribution of loans. This evaluation is based on information for:

- ▶ Total loans from January 1, 1996 through September 10, 1996,
- ▶ Housing related loans from January 1, 1996 through December 31, 1996, and
- ▶ Commercial credits from January through June 1997.

The following table indicates the overall performance level of **Wheeling National Bank** with respect to each of the five performance criteria.

SMALL INSTITUTION ASSESSMENT CRITERIA	WHEELING NATIONAL BANK PERFORMANCE LEVELS		
	Exceeds Standards for Satisfactory Performance	Meets Standards for Satisfactory Performance	Does not meet Standards for Satisfactory Performance
Loan to Deposit Ratio	X		
Lending in Assessment Area	X		
Lending to Borrowers of Different Incomes and to businesses of Different sizes		X	
Geographic Distribution of Loans		X	
Response to Complaints	No CRA Related Complaints		

DESCRIPTION OF INSTITUTION

With assets of \$454 million and its main banking office located at 135 West Main Street, St. Clairsville, Ohio, WNB serves its customers through twenty full service offices. Eight of these offices are in Ohio, Hancock and Wetzel counties of West Virginia and twelve in Franklin, Jefferson, Belmont, Guernsey, and Harrison counties of Ohio. All offices have drive-through facilities. WNB also operates six proprietary automated teller machines throughout West Virginia and Ohio.

Wheeling National Bank is a wholly owned subsidiary of American Bancorporation, a

\$462 million registered Ohio bank holding company headquartered in Wheeling, West Virginia. In addition to banking offices, this holding company operates three non-bank subsidiaries: American Mortgages, Inc., which originates and services mortgage loans, American Bancdata Corporation, which provides electronic data processing services to its parent, WNB, and American Bancservices, Inc., which provides the holding company's transfer agent services.

Since the previous CRA exam, conducted as of December 31, 1993, Wheeling National Bank has undergone a merger with its affiliate, Columbus National Bank, an Ohio banking institution. Wheeling National Bank is the surviving entity of this merger.

As a result of the merger, total assets increased substantially from \$198 million at year-end 1995 to \$364 million by March 31, 1996. WNB continued to grow after the merger with total assets reaching \$454 million by March 31, 1997. Total loans represented approximately 61% of bank assets. WNB's loan portfolio is comprised of 50% residential real estate loans, 32% commercial and commercial real estate loans, 17% consumer loans and approximately 1% agricultural and other loans. WNB offers a variety of deposit and loan products, including secured and unsecured personal loans with a minimum loan amount of \$1,000. Home purchase and refinances of home mortgages include 3 year and 5 year balloons with amortization periods of up to 30 years. A 20% down payment is normally required for home purchases, however, WNB offers private mortgage insurance for those borrowers with as little as 10% down. The bank also accommodates customers who need more flexible credit terms by offering credit cards.

There are no financial conditions, legal constraints, or other conditions that would hinder the bank's ability to help meet the credit needs of its assessment area. Wheeling National Bank's and Columbus National Bank's CRA performances were last evaluated as of December 1993 and both received satisfactory ratings.

DESCRIPTION OF ASSESSMENT AREAS

For purposes of the CRA, WNB has defined five assessment areas within two diverse markets - the upper Ohio River Valley and a portion of the Columbus Metropolitan Statistical Area (MSA). These assessment areas include metropolitan and non-metropolitan portions of West Virginia (WV) and Ohio (OH).

These assessment areas are listed below:

Assessment Area #1 - MSA 9000 The entire Wheeling-Bridgeport Metropolitan Statistical Area

Assessment Area #2 - MSA 8080 The entire Weirton-Steubenville Metropolitan Statistical Area

Assessment Area #3 - Franklin County, OH; Census Tracts¹ 305 & 306 in Fairfield County, OH and Census Tract 7562 in Licking County, OH.

Assessment Area #4 - Guernsey County, OH and Census Tracts 9758, 9759, and 9760 in Harrison County, OH.

Assessment Area #5 - Wetzel County, WV and Census Tract 9618 in Tyler County

While assessment areas 1 and 2 include entire MSAs, assessment area 4 includes all of Guernsey County, OH and only three of the five census tracts in Harrison County, OH. These tracts were chosen due to their being contiguous with Guernsey and Belmont Counties and in close proximity to bank branches.

Assessment area 5 includes all of Wetzel County and two of the four census tracts in Tyler County, WV. Bank branches are located within two of the four tracts in Wetzel County. Census tract 9618 was chosen due to it being closest to the bank branches and its direct connection to New Martinsville by way of Route 2.

These assessment areas meet the requirements of the regulation and do not arbitrarily exclude low- and moderate-income geographies.

Ohio River Valley (Assessment Areas 1, 2, 4, & 5)

¹A census tract is an area defined by the Bureau of the Census for information gathering purposes.

The Ohio River Valley consists of Hancock, Marshall, Ohio, and Brooke Counties in the northern panhandle of WV, as well as Wetzel and Tyler Counties in WV. It also encompasses the eastern portion of OH, including Belmont, Guernsey, and Harrison Counties. Although management has divided this market into four separate assessment areas, these counties collectively form the Ohio River Valley. These separate delineations enable management to evaluate lending activity within the Wheeling-Bridgeport MSA and the Weirton-Steubenville MSA, referred to in this evaluation as assessment areas 1 and 2, respectively, as well as within the non-metropolitan areas of the Ohio Valley.

The general economy of the Ohio River Valley is weak and loan demand is static. Very few active coal mines remain and only three steel mills. The primary employers are Wheeling-Pittsburgh Steel, Wheeling-Nissan Steel, Weirton Steel, Consolidation Coal Company, Bayer Corporation, Consolidated Aluminum, and Ormet Corporation. The June 1997 West Virginia Economic Summary reported an unemployment rate of 7.7% within the Wheeling-Bridgeport MSA based on April 1997 data. Also according to this summary, unemployment rates for Brooke and Hancock Counties were 9.5% and 8.0%, respectively. The unemployment rate for Tyler County was 7.9% and 9.8% for Wetzel County. The WV statewide unemployment rate was 7.5%. Based on August 1996 Ohio Bureau of Employment Services, the unemployment rate for OH was 4.3%.

Columbus MSA (Assessment Area 3)

The portion of the Columbus MSA served by WNB, includes Franklin County, OH, as well as census tracts 305 and 306 in Fairfield County, OH and census tract 7562 in Licking County, OH. These three census tracts border Franklin County to the east. They were included due to the bank's branch in Reynoldsburg (Franklin County) being located approximately five miles from the above named census tracts in Fairfield and Licking counties. The remaining 22 census tracts within Fairfield County and 30 census tracts within Licking County, along with all of Delaware, Madison, and Pickaway Counties have been excluded from this assessment area due to these areas being some distance away from the bank's branches.

In contrast to the Ohio River Valley, the economy of the Columbus area is very healthy and growing. In 1996, population in the Columbus area was estimated at 631,850. This market is comprised of large and small growing companies. Businesses with annual sales of less than \$10 million comprise much of the business segment of the Central OH market. This market continues to have growth in construction. The population is increasing and consists of a young, mobile, higher income group. The 1990 median age among Columbus residents was 29.4 years and 30.8 years in Franklin County. The labor market is strong, with unemployment levels for Franklin and

contiguous areas at all time lows. Based on Ohio County Business Patterns, the largest employment category is services, followed by wholesale and retail trade. Major employers include the State of Ohio, Ohio State University, Federal Government, Columbus Public Schools and the City of Columbus.

WNB is surrounded by bank and non-bank competition. Several large regional and multinational banks such as National City, Huntington Bancshares, Banc One Corporation, and Key Corporation are represented in the bank's markets. In addition, numerous small and medium-sized independent and community banks, as well as savings banks, compete for market share.

Housing stock within the Wheeling area is very old, with the average year built being 1943. The median housing value is \$42,450. There is limited availability of affordable housing. Rehabilitation of housing has been identified through community contacts as a great need. A need for massive demolition of dangerous dilapidated structures has also been identified. Overall, there is the perception that the city needs to be more active in the area of housing development and redevelopment and that much of the housing stock is in serious decline. WNB has helped to address housing needs by approving 516 housing related loans totaling \$21 million during 1996. Another credit need has been identified as the need for programs that assist individuals in starting up or expanding new businesses. As a Small Business Administration (SBA) lender, WNB has been responsive to the needs of small businesses by approving numerous small business loans. In addition, the majority of other types of commercial loans have been for amounts of less than \$100,000.

Tables depicting the income characteristics of census tracts within the assessment areas are shown on the following page. Census tract designations are based on the U.S. Census 1990 median family income² for each assessment area.

Census Tract Designations Within Each Assessment Area

²The term "median family income" is the income earned by people sharing a home that are related by birth, marriage, or adoption.

Assessment Area #1- MSA 9000 Wheeling-Bridgeport

Income Level of Tract	# of Tracts	% of Tracts
Low	4	8.89
Moderate	6	13.33
Middle	26	57.78
Upper	9	20.00
Total	45	100.00

* The U.S. Census 1990 Median Family Income for the Wheeling-Bridgeport MSA is \$27,287.

Assessment Area #2 - MSA 8080 Weirton-Steubenville

Income Level of Tract	# of Tracts	% of Tracts
Low	1	2.00
Moderate	8	16.00
Middle	31	62.00
Upper	10	20.00
Total	50	100.00

*The U.S. Census 1990 Median Family Income for the Weirton-Steubenville MSA is \$29,169.

**Assessment Area #3 - Franklin County; Fairfield County Census Tracts 305&306;
Licking County Census Tracts 7562**

Income Level of Tract	# of Tracts	% of Tracts
Low	35	13.73
Moderate	64	25.10
Middle	93	36.47
Upper	63	24.70
Total	255	100.00

* The U.S. Census 1990 Median Family Income for the Columbus MSA is \$36,792.

Census Tract Designations Within Each Assessment Area

**Assessment Area #4 - Guernsey County; Harrison County Census Tracts
9758,9759,9760**

Income Level of Tract	# of Tracts	% of Tract
Low	0	0.00
Moderate	7	53.85
Middle	6	46.15
Upper	0	00.00
Total	13	100.00

* The U.S. Census 1990 Median Family Income for Non-MSA portions of OH is \$30,563.

Assessment Area #5 - Wetzel County; Tyler County Census Tract 9618

Income Level of Tract	# of Tracts	% of Tracts
Low	0	0.00
Moderate	0	0.00
Middle	3	60.00
Upper	2	40.00
Total	5	100.00

* The U.S. Census 1990 Median Family Income for Non-MSA portions of WV is \$22,655.

Total for All Five Assessment Areas Combined

Income Level of Tract	# of Tracts	% of Tracts
Low	40	10.87
Moderate	85	23.10
Middle	159	43.21
Upper	84	22.83
Out of Assessment Area	N/A	N/A
Non-Geocoded Loans	N/A	N/A
Total	368	100.00

Characteristics of the assessment area population according to income level are shown in the following tables. Designations for family incomes are based on 1996 Housing and

Urban Development (HUD) median family income levels.

Family Income Levels Within Each Assessment Area

Assessment Area #1- MSA 9000 Wheeling-Bridgeport

Income Level of Families in AA	# of Families	% of Families
Low	9,003	20.23
Moderate	8,109	18.22
Middle	9,757	21.92
Upper	17,631	39.63
Total for Assessment Area 1	44,500	100.00

Assessment Area #2 - MSA 8080 Weirton-Steubenville

Income Level of Families in AA	# of Families	% of Families
Low	8,206	20.19
Moderate	7,299	17.96
Middle	9,098	22.38
Upper	16,045	39.47
Total for Assessment Area 2	40,648	100.00

**Assessment Area #3 - Franklin County; Fairfield County Census Tracts 305&306;
Licking County Census Tracts 7562**

Income Level of Families in AA	# of Families	% of Families
Low	47,075	18.82
Moderate	43,132	17.25
Middle	60,166	24.06
Upper	99,700	39.87
Total for Assessment Area 3	250,073	100.00

Family Income Levels Within Each Assessment Area

Assessment Area #4 - Guernsey County and Harrison County Census Tracts 9758,

9759, 9760

Income Level of Families in AA	# of Families	% of Families
Low	3,703	27.99
Moderate	2,804	21.20
Middle	3,108	23.50
Upper	3,613	27.31
Total for Assessment Area 4	13,228	100.00

Assessment Area #5 - Wetzel County and Tyler County Census Tract 9618

Income Level of Families in AA	# of Families	% of Families
Low	1,273	19.46
Moderate	889	13.59
Middle	988	15.10
Upper	3,390	51.83
Total for Assessment Area 5	6,540	100.00

Total for All Assessment Areas Combined

Income Level of Families in AA	# of Families	% of Families
Low	69,260	19.51
Moderate	62,233	17.53
Middle	83,117	23.41
Upper	140,379	39.55
Total for All Assessment Areas	354,989	100.00

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA :

- ◆ **Loan to Deposit Ratio**

WNB's overall performance with regard to the loan to deposit ratio exceeds the standard for satisfactory performance. This conclusion is based on a review of performance within each assessment area. The loan to deposit ratios for the Wheeling-Bridgeport MSA, the Weirton-Steubenville MSA and for assessment area 4, which includes Guernsey County, OH and portions of Harrison County, OH meet the standard for satisfactory performance. Loan to deposit ratios within assessment area 3 and 5 exceed the standard for satisfactory performance. Assessment area 3 includes Franklin County and portions of Fairfield and Licking Counties in OH. Assessment area 5 includes Wetzel County and Census tract 9618 within WV.

During the thirteen quarters since the prior CRA examination, WNB's net loan to deposit ratio has increased from 57.75% at March 31, 1994 to 83.61% at March 31, 1997. The average net loan to deposit ratio for this time period was 77.87%. At year-end 1995, just prior to the merger with Columbus National Bank (CNB), WNB's net loan to deposit ratio was 88.65%; even higher than at March 31, 1997. The merger with CNB which occurred during the first quarter of 1996 lowered this ratio due to CNB's net loan to deposit ratio at the time of the merger being 80.05%. This ratio has steadily increased since the merger.

WNB has historically had a higher loan to deposit ratio than the bank's national peer group which includes banks of similar size and number of branches. At March 31, 1997, WNB's net loan to deposit ratio of 83.61% was higher than the national peer average of 74.93%. WNB was ranked in the 75th percentile, which means that WNB had loaned more of every dollar of deposits than 75% of all other banks of similar size.

WNB's net loan to deposit ratio was also higher than those of three other banking institutions competing in the Ohio Valley market. The loan to deposit ratios for the three competing institutions ranged from 65.34% to 73.51% at March 31, 1997.

Loan to Deposit ratios for each of the assessment areas are presented on the following pages.

Loan to Deposit Ratio for Each Assessment Area

Assessment Area #1 - Wheeling-Bridgeport

Location	\$ Amount of Loans	\$ Amount of Deposits	LTD %
Belmont County, OH	7,805,010	20,205,368	38.63
Marshall County, WV	2,529,561	1,836,371	137.75
Ohio County, WV	10,760,956	8,650,562	124.40
Total for Assessment Area 1	21,095,527	30,692,301	68.73

Assessment Area #2 - Weirton-Steubenville

Location	\$ Amount of Loans	\$ Amount of Deposits	LTD %
Jefferson County, OH	2,138,462	4,977,223	42.96
Brooke County, WV	1,828,700	2,550,253	71.71
Hancock County, WV	3,118,933	2,743,447	113.69
Total for Assessment Area 2	7,086,095	10,270,923	68.99

Assessment Area #3 - Franklin County, OH; Fairfield County, OH Census Tracts 305, 306; Licking County, OH Census Tract 9762

Location	\$ Amount of Loans	\$ Amount of Deposits	LTD %
Franklin County, OH	10,879,200	3,098,360	351.13
Fairfield County, OH CT 305	153,954	63,268	243.34
Fairfield County, OH CT 306	107,650	5,577	1930.25
Licking County, OH CT 7562	70,047	55,897	125.31
Total for Assessment Area 3	11,210,851	3,223,202	347.82

Loan to Deposit Ratios for Each Assessment Area

Assessment Area #4 - Guernsey County, OH; Harrison County, OH Census Tracts

9758,9759,9760

Location	\$ Amount of Loans	\$ Amount of Deposits	LTD %
Guernsey County, OH	2,219,199	6,023,404	36.84
Harrison County, OH CT 9758	175,490	402,044	43.65
Harrison County, OH CT 9759	160,145	1,475,510	10.85
Harrison County, OH CT 9760	5,171	97,868	5.28
Total for Assessment Area 4	2,560,005	7,998,826	32.00

Assessment Area #5 - Wetzel County, OH; Tyler County Census Tract 9618

Location	\$ Amount of Loans	\$ Amount of Deposits	LTD %
Wetzel County	1,522,217	1,418,194	107.33
Tyler County, WV CT 9618	97,342	74,035	131.48
Total for Assessment Area 5	1,619,559	1,492,229	108.53

Total for All Assessment Areas Combined

Location	\$ Amount of Loans	\$ Amount of Deposits	LTD %
Assessment Area #1	21,095,527	30,692,301	68.73
Assessment Area #2	7,086,095	10,270,923	68.99
Assessment Area #3	11,210,851	3,223,202	347.82
Assessment Area #4	2,560,005	7,998,826	32.00
Assessment Area #5	1,619,559	1,492,229	108.53
Total Within AAs	43,572,037	53,677,481	81.17
Out of Area	9,001,311	2,696,498	333.81
Non-geocoded Loans	3,682,502	2,549,763	144.43
Grand Total	56,255,850	58,923,742	95.47

◆ **Lending in the bank's assessment areas**

On an overall basis, WNB has exceeded the standard for satisfactory performance with

regard to lending inside of the assessment areas. The substantial portion of all loans made from January 1, 1996 to September 10, 1996 were made within the assessment areas. WNB made 2,739 loans totaling \$56 million during that time period. Of these, 2,415, or 88% of the number of loans made, were within the assessment areas. Based on dollar volume, loans within the assessment areas approximated \$44 million or 77%. The table presented below and continuing on the following page depicts the bank's lending in each of the assessment areas, as well as loans made outside of the assessment areas and non-geocoded loans.

Loans made Inside/Outside of the Assessment Areas
(Based on Total Loans made between January 1, 1996 - September 10, 1996)

Location	# of Loans	% of Total Loans by #	\$ Amount (000s)	% of Total Loans by \$
Belmont County	596	21.76	7,805	13.87
Marshall County	207	7.56	2,503	4.50
Ohio County	636	23.22	10,761	19.13
Total for Assessment Area #1	1,439	52.54	21,096	37.50
Jefferson County	158	5.77	2,138	3.80
Brooke County	121	4.42	1,829	3.25
Hancock County	125	4.56	3,119	5.54
Total for Assessment Area #2	404	14.75	7,086	12.60
Franklin County	151	5.51	10,879	19.34
Fairfield County (Census Tract 305)	4	.15	154	.27
Fairfield County (Census Tract 306)	5	.18	108	.19
Licking County (Census Tract 7562)	3	.11	70	.12
Total for Assessment Area #3	163	5.95	11,211	19.93
Guernsey County	222	8.11	2,219	3.94
Harrison County (Census Tract 9758)	17	.62	175	.31
Harrison County (Census Tract 9759)	22	.80	160	.28
Harrison County (Census Tract 9760)	1	.04	5	.01
Total for Assessment Area #4	262	9.57	2,559	4.55
Wetzel County	134	4.89	1,522	2.71
Tyler County (Census Tract 9618)	13	.47	97	.17

Total for Assessment Area #5	147	5.37	1,619	2.88
Total Within All Assessment Areas	2,415	88.17	43,572	77.45
Out of Assessment Areas	195	7.12	9,001	16.00
Non-Geocoded Loans	129	4.71	3,683	6.55
Grand Total	2,739	100.00	56,256	100.00

◆ **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

WNB's lending to borrowers of different income levels is reasonable and meets the standard for satisfactory performance within each assessment area. This is based on an evaluation of all housing related loans made between January 1, 1996 and December 31, 1996 within each of the five assessment areas. The charts below illustrate the number and dollar volume of loans to borrowers of different income levels within each assessment area. *Data was not available to show assessment areas 4 and 5 separately. However, these areas were evaluated on a combined basis and are presented below.

Distribution of 1996 Housing Related Loans by Borrower Income

Assessment Area #1- MSA 9000 Wheeling-Bridgeport

Income Level of Borrower	# of Loans	% of Loans by #	\$ Amount of Loans (000s)	% of Loans by \$	% of Families in AA
Low	32	11.43	284	3.89	20.23
Moderate	47	16.79	620	8.48	18.22
Middle	74	26.43	1,485	20.32	21.92
Upper	127	45.35	4,920	67.31	39.63
Total	280	100.00	7,309	100.00	100.00

* Based on HUD's 1996 Median Family Income for MSA 9000 of \$32,700.

Distribution of 1996 Housing Related Loans by Borrower Income Level

Assessment Area #2 - MSA 8080 Weirton-Steubenville

Income Level of Borrower	# of Loans	% of Loans by #	\$ Amount of Loans (000s)	% of Loans by \$	% of Families in AA
Low	1	1.52	18	.64	20.19
Moderate	10	15.15	214	7.63	17.96
Middle	18	27.27	314	11.19	22.38
Upper	37	56.06	2,260	80.54	39.47
Total	66	100.00	2,806	100.00	100.00

*Based on HUD's 1996 Median Family Income for MSA 8080 of \$33,300.

**Assessment Area #3 - Franklin County; Fairfield County Census Tracts 305&306;
Licking County Census Tracts 7562**

Income Level of Borrower	# of Loans	% of Loans by #	\$ Amount of Loans (000s)	% of Loans by \$	% of Families in AA
Low	4	5.48	186	1.98	18.82
Moderate	11	15.07	705	7.49	17.25
Middle	20	27.40	1,544	16.40	24.06
Upper	38	52.05	6,978	74.13	39.87
Total	73	100.00	9,413	100.00	100.00

* Based on HUD's 1996 Median Family Income for MSA 1840 of \$46,200.

Distribution of 1996 Housing Related Loans by Borrower Income Level

Non-MSA Areas of West Virginia and Ohio(Includes Assessment Areas 4 & 5 and Loans in Non-MSA area outside of the bank's Assessment Areas)

Income Level of Borrower	# of Loans	% of Loans by #	\$ Amount of Loans (000s)	% of Loans by \$	% of Families in AA
Low	12	12.37	121	5.15	25.17
Moderate	19	19.59	182	7.75	18.68
Middle	29	29.90	531	22.61	20.72
Upper	37	38.14	1,514	64.49	35.43
Total	97	100.00	2,348	100.00	100.00

* Based on an average of HUD's 1996 Median Family Income for Non-metropolitan portions of WV of \$26,600 and non-metropolitan portions of OH of \$37,000. Average of WV & OH is \$31,800.

Total for All Five Assessment Areas Combined

Income Level of Borrower	# of Loans	% of Loans by #	\$ Amount of Loans (000s)	% of Loans by \$	% of Families in all AAs
Low	49	9.50	609	2.78	19.51
Moderate	87	16.86	1,721	7.87	17.53
Middle	141	27.33	3,874	17.71	23.41
Upper	239	46.31	15,672	71.64	39.55
Total 1996 HMDA Housing Related Loans	516	100.00	21,876	100.00	100.00

* This table represents an aggregate of all assessment areas combined.

WNB has also been responsive to the credit needs of businesses of different sizes. This was determined by evaluating the size of all commercial loans and lines of credit approved from January through June 1997. Loan size was used as a basis for evaluating the size of business. This information was not available within each assessment area, therefore, this data was evaluated on an overall basis. As can be seen from the

distribution of commercial loans and lines presented below, the substantial majority were for amounts of less than \$100,000.

Size of Loan	# of Loans/Lines	% of Loans/Lines by #	\$ Amount	% of Loans/Lines by \$
< \$100,000	109	78.99	2,850,739.86	19.95
\$100,000 - \$250,000	19	13.77	2,701,244.92	18.90
>\$250,000	10	7.24	8,739,247.87	61.15
Total	138	100.00	14,291,32.65	100.00

◆ **Geographic Distribution of Loans**

The geographic distribution of loans among low-, moderate-, middle-, and upper-income census tracts within each assessment area is reasonable. With respect to this performance criteria, WNB has met the standard for satisfactory performance within each assessment area. The following tables show the distribution of total loans made between January 1, 1996 and September 10, 1996.

Distribution of Total Loans within each Assessment Area by Geography
Assessment Area #1- MSA 9000 Wheeling-Bridgeport

Income Level of Tract	# of Tracts	% of Tracts	# of Loans	% of Loans by #	Dollar Amount (000s)	% of Loans by \$
Low	1	2.00	7	.49	33	.16
Moderate	8	16.00	70	4.89	1,207	5.72
Middle	31	62.00	1,015	70.54	14,102	66.85
Upper	10	20.00	347	24.11	5,754	27.27
Total	50	100.00	1,439	100.00	21,096	100.00

Distribution of Total Loans within each Assessment Area by Geography
Based on Loans made between January 1, 1996 - September 10, 1996

Assessment Area #2 - MSA 8080 Weirton-Steubenville

Income Level of Tract	# of Tracts	% of Tracts	# of Loans	% of Loans by #	Dollar Amount (000s)	% of Loans by \$
Low	4	8.89	3	.74	57	.80
Moderate	6	13.33	28	6.93	587	8.28
Middle	26	57.78	260	64.36	3,522	49.70
Upper	9	20.00	113	27.97	2,920	41.22
Total	45	100.00	404	100.00	7,086	100.00

**Assessment Area #3 - Franklin County; Fairfield County Census Tracts 305&306;
Licking County Census Tracts 7562**

Income Level of Tract	# of Tracts	% of Tracts	# of Loans	% of Loans by #	Dollar Amount (000s)	% of Loans by \$
Low	35	13.73	3	1.84	145	1.29
Moderate	64	25.10	12	7.36	809	7.22
Middle	93	36.47	56	34.36	3,891	34.71
Upper	63	24.70	92	56.44	6,366	56.78
Total	255	100.00	163	100.00	11,211	100.00

**Distribution of Total Loans within each Assessment Area by Geography
Based on Loans made between January 1, 1996 - September 10, 1996**

Assessment Area #4 - Guernsey County; Harrison County Census Tracts

9758,9759,9760

Income Level of Tract	# of Tracts	% of Tract	# of Loans	% of Loans by #	Dollar Amount (000s)	% of Loans by \$
Low	0	00.00	0	00.00	0	00.00
Moderate	7	53.85	134	51.15	1,292	50.47
Middle	6	46.15	128	48.85	1,268	49.53
Upper	0	00.00	0	00.00	0	00.00
Total	13	100.00	262	100.00	2,560	100.00

Assessment Area #5 - Wetzel County; Tyler County Census Tract 9618

Income Level of Tract	# of Tracts	% of Tracts	# of Loans	% of Loans by #	Dollar Amount (000s)	% of Loans by \$
Low	0	00.00	0	00.00	0	00.00
Moderate	0	00.00	0	00.00	0	00.00
Middle	3	60.00	76	51.70	598	36.94
Upper	2	40.00	71	48.30	1,021	63.06
Total	5	100.00	147	100.00	1,619	100.00

**Distribution of Total Loans within each Assessment Area by Geography
Based on Loans made between January 1, 1996 - September 10, 1996**

Total for All Five Assessment Areas Combined

Income Level of Tract	# of Tracts	% of Tracts	# of Loans	% of Loans by #	Dollar Amount (000s)	% of Loans by \$
Low	40	10.87	13	.47	235	.42
Moderate	85	23.10	244	8.91	3,895	6.92
Middle	159	43.21	1,535	56.04	23,381	41.56
Upper	84	22.83	623	22.75	16,062	28.55
Out of Assessment Area	N/A	N/A	195	7.12	9,001	16.00
Non-Geocoded Loans	N/A	N/A	129	4.71	3,682	6.55
Total	368	100.00	2,739	100.00	56,256	100.00

◆ **Response to Complaints**

WNB has received no CRA related complaints since the prior evaluation.

◆ **Compliance with Anti-discrimination Laws and Regulations**

We performed a fair lending examination in conjunction with our CRA evaluation. No violations of the substantive provisions of anti-discrimination laws and regulations were identified.